

THE COVINA BOWL SPECIFIC PLAN DRAFT ENVIRONMENTAL IMPACT REPORT



1060 West San Bernardino Rd
Covina, CA



CITY OF COVINA, CALIFORNIA

DECEMBER 2020

STATE CLEARINGHOUSE NO. 2020010334

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DRAFT
ENVIRONMENTAL IMPACT REPORT
THE COVINA BOWL SPECIFIC PLAN PROJECT
COVINA, CALIFORNIA
STATE CLEARINGHOUSE NO. 2020010334

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DECEMBER 2020

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ACRONYMS AND ABBREVIATIONS

°C	degrees celsius
µg/m ³	micrograms per cubic meter
AB 52	California Assembly Bill 52
ACM	asbestos-containing material
AF	acre-feet
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
AQIA	Air Quality Impact Analyses
AQMP	Air Quality Management Plan
APN	Assessor's Parcel Number
ATCM	airborne toxic control measure
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measure
BACT	best available control technology
Basin	South Coast Air Quality Basin
BAU	business as usual
BFE	base flood elevation
bgs	below ground surface
BMPs	Best Management Practices
CAA	Clean Air Act of 1970
CAAA	CAA Amendments of 1990
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan of 2013
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act of 1988
CDFW	California Department of Fish and Wildlife
CC&Rs	Covenants, Conditions, and Restrictions
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGEU	California Gas and Electric Utilities 2016 California Gas Report
CGS	California Geological Survey
CH ₄	methane
CHAPIS	Community Health Air Pollution Information System (CARB)
CHRIS	California Historical Resources Inventory System
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CTP	Clean Truck Program
CUP	Conditional Use Permit
dB	decibel

dba	A-weighted decibels
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMS	Emergency Medical Services
ESA	Environmental Site Assessment
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act of 1973
FMMP	Farmland Mapping and Monitoring Program
gal/day	gallons per day
GHG	greenhouse gas
GWP	global warming potential
Handbook	Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005)
HAPs	hazardous air pollutants
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HDT	Heavy Duty Trucks
HFCs	hydroflourocarbons
Hot Spots Act	Air Toxics Hot Spots Information and Assessment Act of 1987
HP	horsepower
HPLV	High Pressure Low Volume
HVAC	heating, ventilating, and air conditioning
ICU	intersection capacity utilization
I	Interstate
I-5	Santa Ana Freeway
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
LEV	Low Emission Vehicle
LID	low impact development
LOS	level of service
LSTs	localized significance thresholds
MACT	maximum available control technology
MBTA	Migratory Bird Treaty Act of 1918
MCC	Material Culture Consulting
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric tons
MT CO _{2e}	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
N ₂ O	nitrous oxide
NAHC	Native American Heritage Commission
NALs	numeric action levels
NCCP	Natural Community Conservation Plan
NESHAP	national emissions standards for HAPs
NH ₃	ammonia
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic and Safety Administration
NMC	New Model Colony

NOP	Notice of Preparation
NO ₂	nitrogen oxide
NO _x	nitrogen oxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	U.A. Department of Agriculture Natural Resources Conservation Service
O ₃	ozone
ODC	Ontario Development Code
ONT	Ontario International Airport
PA	Planning Area
Pb	lead
PDF	project design feature
PFCs	perfluorocarbons
PM _{2.5}	particulate matter less than 2.5 micrometers in aerodynamic diameter
PM ₁₀	particulate matter less than 10 micrometers in aerodynamic diameter
ppb	parts per billion
PPP	Plans, Programs, and Policies
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Plan
PWS	public water supplier
REC	recognized environmental conditions
ROG	reactive organic gas
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB 18	California Senate Bill 18, Ch. 905 (2004)
SC	Standard Condition
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison Company
SCS	Sustainable Communities Strategy
SF	square feet
SF ₆	sulfur hexafluoride
SIP	state implementation plan
SO ₂	sulfur dioxide
SO ₃	sulfur trioxide
SO ₄	sulfates
SoCalGas	Southern California Gas Company
SO _x	sulfur oxides
SP	Specific Plan
SR	State Route
SR-60	Pomona Freeway
SR-83	Euclid Avenue
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	Storm Water Resources Control Board
TACs	toxic air contaminants
TIA	Traffic Impact Analysis
tpy	tons per year
TTCP	traditional tribal cultural places

TUA	traditional use area
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UTRs	utility tractors
UWMP	Urban Water Management Plan
VdB	velocity levels expressed in decibel notation
VMT	vehicle miles travelled
VOC	volatile organic compounds
WDR	Waste Discharge Requirements
WFA	Water Facilities Authority
Williamson Act	California Land Conservation Act of 1965
WQC	Water Quality Certification

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1. Executive Summary

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Covina Bowl Specific Plan (proposed Project). This EIR has been prepared in conformance with State and City of Covina environmental policy guidelines for implementation of the California Environmental Quality Act (CEQA).

The EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR will be available for public review at the City's website: <https://covinaca.gov/pc/page/projects-under-review>) or physically at the following location:

City of Covina, Planning Division
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Covina, CA 91723

Written comments related to environmental issues in the Draft EIR should be addressed to:

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A Notice of Availability of the Draft EIR was published concurrently with distribution of this document.

1.1 PROJECT LOCATION

The proposed 7.5-acre Covina Bowl Specific Plan ("Project" or "Specific Plan") area is located within the western portion of the City of Covina. The City of Covina is in the San Gabriel Valley region of Los Angeles County, approximately 22 miles east of downtown Los Angeles, 35 miles west of downtown San Bernardino, and 10 miles northeast of Orange County.

The Project site is bounded by N. Rimsdale Avenue to the east, W. San Bernardino Road to the north, and W. Badillo Street to the south. Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately 0.20 miles to the east. Local access is provided by W. San Bernardino Road, W. Badillo Street, and N. Rimsdale Avenue.

The Project site is within the southwest quarter of Section 15, Township 1 South, Range 10 West, San Bernardino Base and Meridian as depicted on the U.S. Geological Survey (USGS) Baldwin Park 7.5- minute quadrangle.

1.2 PROJECT DESCRIPTION SUMMARY

The proposed Project includes a Specific Plan that would divide the Project site into four Planning Areas and guide infill redevelopment of approximately 7.5-acre site. The proposed Specific Plan would replace the the existing Regional or Community Shopping Center (C-3A) and Multiple Family (RD-1500) zoning districts with Covina Bowl Specific Plan (CBSP) designations. However, the commercial/office and residential land

uses that are permitted by the the now-existing zoning designations would be permitted and accommodated by the proposed CBSP designations. The proposed uses and land use designations for each Planning Area of the Specific Plan are described below.

In addition to the Covina Bowl Specific Plan, the proposed Project includes the development of a portion of the plan area. An application has been filed by Trumark Homes (Project Applicant) requesting approval of a Vesting Tentative Tract Map and Major Site Plan Review to allow the construction and operation of a mixed-use development that includes adaptive reuse of the Covina Bowl building to provide 12,000 square feet commercial/office uses within Planning Area 1, and development of 132 for sale multi-family residential units within 16 three-story buildings in Planning Area 2.

Planning Area 1: CBSP Commercial/Office. The Covina Bowl building would be adaptively reused to provide approximately 12,000 square feet of commercial/office space that would be utilized for administrative offices, retail, coffee shop/bakery, and other uses commonly found in neighborhood commercial zones. Adaptive reuse of the Covina Bowl building would include demolition of the rear (west) mass that previously contained the bowling lanes (removed in 2017), the south addition (1963), portions of the northern part of the building, and restoration of the remaining building.

The existing Covina Bowl building was determined to be eligible for listing in the National Register in 2016 and is listed in the California Register of Historic Resources (CRHR). The Covina Bowl building has also been found eligible for local designation as a City Landmark. Therefore, the Project includes adaptive reuse of the building in compliance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards; Department of the Interior regulations 36 CFR 68).

Planning Area 2: CBSP Residential. The proposed development within Planning Area 2 consists of 132 for sale multi-family residential units that would be located within 16 three-story buildings. The proposed residential units would include one through four-bedroom units.

Parking. Vehicular parking spaces would be provided at a rate of approximately 2.09 spaces per residential unit and approximately 5 spaces per 1,000 square feet of commercial/office space that total of 346 parking spaces. The Project also proposes modifications to the N. Rimsdale Avenue right-of-way to create the diagonal parking along the site frontage.

Open Space, Recreation, and Other Amenities. Residential units would include between 125 sf to 150 sf (15,820 sf total) of private open space. In addition, the proposed development would provide approximately 5,026 square feet of common open space and recreational area.

Access and Circulation. Vehicular access to Planning Areas 1 and 2 would be provided by five driveways that would be developed pursuant to the City of Covina design standards. The driveways include one driveway on W. San Bernardino Road, three driveways on N. Rimsdale Avenue, and one driveway on W. Badillo Street. The Project also includes pedestrian paths to provide for non-vehicular onsite circulation for connection to existing sidewalks and bike lanes adjacent to the proposed Project.

Landscaping. The Project would provide new ornamental landscaping throughout the proposed development area that would include a variety of trees, shrubs, and ground covers. Proposed landscaping would be provided in common open space areas located along the new walkways and parking areas. New plant species would be drought-tolerant, non-invasive, and compliant with the City of Covina's landscaping requirements.

Lighting. The proposed Project would install new exterior lighting onsite for security, accent landscaping, and to light signage, walkways, and parking areas. The new lighting would be in compliance with lighting regulations in Municipal Code, Section 17.28.430.

Infrastructure. The proposed development would construct new private streets, curb, gutter, sidewalk, and storm drain improvements, wet and dry utilities, and related infrastructure improvements. The new

development would connect to the existing water, sewer, and drainage infrastructure in the W. Badillo Street and N. Rimsdale Avenue right-of-ways.

Planning Area 3 CBSP Mixed Use. There is no specific development proposed for Planning Area 3. However, buildout of the 0.35-acre area in Year 2040 assumes removal of the existing office space and development of an equivalent 4,175 square-foot retail space or 11 multi-family residential units per the standards of Planning Area No. 2. Vehicular access to Planning Area 3 is planned to be provided via one driveway on Badillo Street.

Planning Area 4 CBSP Mixed Use. There is no specific development proposed for Planning Area 4. However, buildout of the 1.71-acre area in Year 2040 assumes removal of the existing 31 apartment units, restaurant, and associated site improvements and development of 37,244 square feet of retail space or 52 multi-family residential units. Potential uses include, but are not limited to, food/restaurants/eating establishments, and residential. Vehicular access to Planning Area 4 would be provided by one driveway on W. San Bernardino Road.

Given the multiphase nature of the proposed Project and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions to implement the proposed Project, this document has been prepared as a Program EIR for the overall Covina Bowl Specific Plan, pursuant to Section 15168 of the CEQA Guidelines, and as a Project EIR for the pending development project that is a component of the overall proposed Project, pursuant to Section 15161 of the CEQA Guidelines. This EIR analyzes the construction and operation of 132 multi-family residential units and the adaptive reuse the Covina Bowl building for 12,000 SF of commercial/office space within Planning Areas 1 and 2, as well as the N. Rimsdale Avenue right-of-way improvement, at a project-specific level (Development Project) by opening year 2024. The Draft EIR analyzes the full buildout of the Specific Plan at a program level by future year 2040.

1.3 PROJECT OBJECTIVES

The proposed Specific Plan Project has identified the following goals and objectives:

- Preserve the historic Covina Bowl through adaptive reuse;
- Provide new residential, commercial, and office development opportunities to revitalize the plan area;
- Eliminate split zoning across parcels and encourage the planned development of the properties within the plan area that accommodate a range of land uses to meet evolving market demands;
- Provide a more flexible regulatory procedure by which the objectives of the City's General Plan and Zoning Code can be realized;
- Encourage creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of office, residential and commercial land uses and activities;
- Eliminate and prevent the spread of blight by revitalizing and rehabilitating vacant buildings;
- Strengthen the City's economic base by revitalizing the plan area to its full economic potential;
- Provide for-sale multifamily residential with a range of sizes to encourage first-time homebuyers;
- Ensure new residential development includes adequate open space and high quality recreational amenities for future residents;
- Bolster an economically vibrant and active walkable environment through introduction of mixed uses.

- Draw more patrons to surrounding commercial uses and expand walkability through enhanced pedestrian-oriented development within the plan area.
- Enhance the appearance of the community by redeveloping and upgrading the properties and street frontages within the Specific Plan area through creative site planning, high quality architecture, enhanced landscaping and lighting, while embracing the character of the historic Covina Bowl; and
- Transform street frontages and create neighborhood connectivity through pedestrian-oriented improvements and diagonal on-street parking spaces on N. Rimsdale Avenue.

1.4 SUMMARY OF ALTERNATIVES

Section 6.0, *Alternatives*, of this EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Section 6.0 are summarized below.

Alternative 1: No Project/No Build. Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” In addition, Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Thus, under this alternative, the proposed Specific Plan would not be implemented, and no development would occur.

Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of implementing the proposed Project in contrast to the result from not approving, or denying, the proposed Project. This alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative. Under this alternative, no development would occur within the Project site and it would remain in its existing condition, which includes the Covina Bowl building, daycare building, church, 31-unit residential apartment complex (Continental Garden Apartments), and restaurant building (Mar Y Tierra).

As described in Section 4.0, *Existing Setting*, and 5.9, *Land Use and Planning*, the Covina Bowl building (69,138 square feet) and the daycare building (2,994 square feet) are currently vacant. The daycare building has several active code violations; and therefore, it could not be reoccupied by another daycare service provider. Also, the bowling center closed in 2017, the bowling lanes were removed, and the interior of the building has deteriorated. Due to the existing condition of the Covina Bowl building with the bowling lanes removed, lack of flooring in the bowling area, and the damaged bowling alley cantilevered ceiling of various heights, any new use of the building would require extensive rehabilitation pursuant to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, under the No Project/No Build Alternative, the daycare building and the Covina Bowl building would remain vacant.

Alternative 2: Preservation of Entire Covina Bowl Building. Under this alternative, Covina Bowl building would remain in its current condition to retain the historic structure and the proposed residential development within Planning Areas 1 and 2 would be reduced. Due to the retention of the entire Covina Bowl building, the 65 multi-family residential units that were proposed in that portion of the site would not be developed by this alternative. This would result in a 49.2 percent reduction of residential units (65 less units), or a maximum of 67 new units. Additionally, the 3,334 square foot lawn bowl area proposed to be located in the area of the rear, west mass of the Covina Bowl building, would not be provided under this alternative.

The remaining features of the proposed development would occur under this alternative, including the same rate of parking, type of architectural features, tot lot/playground, and barbeque open space area. Like the proposed Project, this alternative would require a General Plan Amendment from the existing land use designations of General Commercial and High Density Residential to Specific Plan (SP), and a zone change to designate the development portion of the site as a Specific Plan (SD).

1.5 SUMMARY OF IMPACTS

Table 1-1 summarizes the conclusions of the environmental analysis contained in this EIR. The level of significance of impacts after the proposed mitigation measures are applied are identified as significant and unavoidable, less than significant, and no impact. Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts.

Table 1-1: Summary of Impacts, Mitigation Measures, and Level of Significance

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.1 Aesthetics				
Impact AE-3: The Project is located within an urban area and would not substantially degrade the existing visual character or quality of public views of the site; and would not conflict with applicable zoning or other regulations governing scenic quality.		Less than significant	None required	Less than significant
Impact AE-4: The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.		Less than significant	None required	
Cumulative		Less than significant	None required	Less than significant
5.2 Air Quality				
Impact AQ-1: The Project would not conflict with or obstruct implementation of the applicable air quality plan.		Less than significant	None required	Less than significant
Impact AQ-2: The Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	PPP AQ-1: Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of Rule 403: o All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. o The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas,	Potentially Significant	Mitigation Measure AQ-1. Prior to issuance of construction permits for development within Planning Area 3 or Planning Area 4 development specific construction related air quality modeling shall be prepared using the latest available CalEEMod model, or other analytical method that is consistent with SCAQMD guidance and be submitted to the City. The results of the construction-related air quality impacts analysis shall identify the emissions generated by the construction activity in comparison to the SCAQMD applicable thresholds. To address potential localized impacts, the air quality analysis shall incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined	Less than significant
Impact AQ-3: The Project would not result in exposure of sensitive receptors to substantial pollutant concentrations.		Potentially Significant		Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p>shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.</p> <p>o The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.</p>		pursuant to SCAQMD criteria. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce emissions to below thresholds.	
Cumulative	<p>PPP AQ-2: Rule 1113. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 1113. The Project shall only use "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113.</p> <p>PPP AQ-3: Rule 445. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.</p>	Less than significant	None required	Less than significant
5.3 Cultural Resources				
Impact CUL-1: The Project would cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.		Significant	Mitigation Measure CUL-1: Covina Bowl Rehabilitation Plan. Prior to demolition of any structures, it shall be demonstrated to the City of Covina that the Covina Bowl will retain the structural integrity of the historic building during construction and shall be verified that constructed plans and building specifications are consistent with the with the Covina Bowl Rehabilitation Plan (Appendix C of the Cultural Resources Survey [Draft EIR Appendix G) to ensure that the proposed	Significant and Unavoidable

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>treatments, and new or revised treatments that may come to light through ongoing physical investigation and repair assessments, will achieve the greatest compliance with the Secretary of the Interior's Standards and applicable guidelines.</p> <p>Mitigation Measure CUL-2: Documentation. Prior to demolition of any structures, a high quality digital scans of Covina Bowl original construction plan set (1955) shall be submitted to the City of Covina Community Development Department, including personal notations, obtained through community outreach during the Cultural Resources Survey (Draft EIR Appendix G) for inclusion with the original plans that are already on file with the Covina Community Development Department.</p> <p>Mitigation Measure CUL-3: Interpretive Program. Prior to demolition of any structures, the Project applicant shall develop an onsite interpretive program to share the history and significance of the Covina Bowl. The program should include the enhancement of two locations (1) in the vicinity of the proposed rear lawn bowling feature where the bowling lanes were located and (2) in a publicly visible and/or accessible location, such as near the public right-of-way or entry to maintain the relationship of the property with the public. The interpretive program shall include, at a minimum, a brief written history of the Covina Bowl cast in bronze and displayed at each location. To the extent possible, the interpretive program should also include one or more other creative</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>elements, in one or both locations, that may be artfully reimagined from historic photographs or bowling-related historic material salvage that is unable to be reused in the proposed project, such as tile from the concourse bulkhead or discarded pieces of green terrazzo.</p> <p>Mitigation Measure CUL-4: Local Designation. Prior to demolition of any structures, the Project applicant shall prepare and submit a local landmark designation nomination application to the Community Development Department, Planning Division to designate the Covina Bowl as a City Landmark.</p> <p>Mitigation Measure CUL-5: Architectural Historian. Prior to the issuance of building permits, the Project applicant shall retain an Architectural Historian of Record, who meets the Secretary of the Interior's Professional Qualification Standards, to review and issue a Notice to File to ensure that the Project demolition, preservation, and construction plans maintain compliance with the Covina Bowl Rehabilitation Plan and the other mitigation measures herein. The Architectural Historian of Record shall supervise demolition and preservation activities, direct appropriate treatment of unforeseen conditions, and provide consultation regarding methods and materials, as needed.</p>	
Impact CUL-2: The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cumulative		Significant	Mitigation Measures CUL-1 through CUL-5.	Significant and Unavoidable
5.4 Energy				
Impact E-1: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.		Less than significant	None required	Less than significant
Impact E-2: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.		No impact	None required	No impact
Cumulative		Less than significant	None required	Less than significant
5.5 Geology and Soils				
Impact GEO-1ii: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in the City's Municipal Code as Chapter 14.04, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for proposed development on the Project site shall be incorporated into grading plans and building specifications as a condition of construction permit approval.	Less than significant	None required	Less than significant
Impact GEO-1iii: The Project would not directly or indirectly cause potential substantial adverse effects, including	PPP GEO-1: CBC Compliance, listed above	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.				
Impact GEO-2: The Project would not result in substantial soil erosion or the loss of topsoil.		Less than significant	None required	Less than significant
Impact GEO-3: The Project would not 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.	PPP GEO-1: CBC Compliance, listed above	Less than significant	None required	Less than significant
Impact GEO-4: The Project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), but it would not create substantial risks to life or property.	PPP GEO-1: CBC Compliance, listed above	Less than significant	None required	Less than significant
Impact GEO-6: The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.		Less than significant	None required	Less than significant
Cumulative	PPP GEO-1: CBC Compliance	Less than significant	None required	Less than significant
5.6 Greenhouse Gas Emissions				
Impact GHG-1: The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.		Less than significant	None required	Less than significant
Impact GHG-2: The Project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
5.7 Hazards and Hazardous Materials				
Impact HAZ-1: The Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.	<p>PPP HAZ-1: SCAQMD Rule 1403. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted on the structures proposed for demolition. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.</p> <p>PPP HAZ-2: Lead. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted on the structures proposed for demolition. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and</p>	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	respiratory protection, and mandates good working practices by workers exposed to lead.			
<p>Impact HAZ-2: The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.</p>	<p>PPP HAZ-1: SCAQMD Rule 1403, listed above.</p> <p>PPP HAZ-2: Lead, listed above.</p> <p>PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building and Safety Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.</p> <p>PPP WQ-2: LID. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Building and Safety Division. The LID shall identify all Post-Construction, Site</p>	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.			
Cumulative	PPP HAZ-1, PPP HAZ-2, PPP WQ-1, PPP WQ-2.	Less than significant	None required	Less than significant
5.8 Hydrology and Water Quality				
Impact WQ-1: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	PPP WQ-1: NPDES/SWPPP, listed above PPP WQ-2: LID, listed above	Less than significant	None required	Less than significant
Impact WQ-3: The Project would not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site.	PPP WQ-1: NPDES/SWPPP, listed above PPP WQ-2: LID, listed above	Less than significant	None required	Less than significant
Impact WQ-4: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	PPP WQ-1: NPDES/SWPPP, listed above PPP WQ-2: LID, listed above	Less than significant	None required	Less than significant
Impact WQ-5: The Project would not 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	PPP WQ-1: NPDES/SWPPP, listed above PPP WQ-2: LID, listed above	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.				
Impact WQ-8: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	PPP WQ-1: NPDES/SWPPP, listed above PPP WQ-2: LID, listed above	Less than significant	None required	Less than significant
Cumulative	PPP WQ-1: NPDES/SWPPP, listed above PPP WQ-2: LID, listed above	Less than significant	None required	Less than significant
5.9 Land Use and Planning				
Impact LU-2: The Project would not 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	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.10 Noise				
Impact NOI-1: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.		Less than significant	None required	Less than significant
Impact NOI-2: The Project would not generate excessive groundborne vibration or groundborne noise levels.		Potentially Significant	Mitigation Measure NOI-1: Construction Vibration: Plans, specifications, and permits for construction within the Project site shall specify that loaded trucks and dozers (greater than 80,000 pounds) and jack hammers shall not be used within	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			90 feet of occupied residences located at 1119 W. Badillo Street (R4) and Covina Bonita Apartments at 1130 W. San Bernardino Road (R5) as shown in Draft EIR Figure 5.10-2: Noise Receptor Locations; and that small rubber-tired or alternative equipment shall be used within 90 feet of these occupied residences.	
Cumulative		Less than significant	None required	Less than significant
5.11 Public Services				
Impact PS-1: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.		Less than significant	None required	Less than significant
Impact PS-2: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services.		Less than significant	None required	Less than significant
Impact PS-3: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts.		Less than significant	None required	Less than significant
Impact PS-4: The Project would not result in substantial adverse physical impacts associated with the provision of		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
new or physically altered other public facilities, the construction of which could cause significant environmental impacts.				
Cumulative		Less than significant	None required	Less than significant
5.12 Parks and Recreation				
Impact PR-1: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts.		Less than significant	None required	Less than significant
Impact PR-2: The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.		Less than significant	None required	Less than significant
Impact PR-3: The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.13 Transportation				
Impact TR-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	PPP TR-1: Municipal Code Section 11.08.300 Permit work – Warning signs, lights and barricades requires that a project performing work which interferes with or endangers the safe movement of traffic shall have the work safeguarded by adequate warning signs, barricades, lights and devices. Project shall be responsible for placing and maintaining adequate	Significant	Mitigation Measure TR-1: Construction Traffic Control Plan. Prior to issuance of a construction permits, a traffic control plan shall be submitted by the development applicant and approved by the City. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	warning signs, barricades, lights and devices during all periods during which traffic movement is interfered with or endangered in order to promote the safe movement of traffic, including but not limited to periods of twilight, nighttime, fog and/or rain. All warning signs, barriers, barricades, flags and other devices shall comply with or exceed the standards required in the Vehicle Code.		<p>practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.</p> <p>Mitigation Measure TR-2: Azusa Avenue/Badillo Street (#9). Prior to issuance of certificates of occupancy for development within each Specific Plan Planning Area, a fair share payment based on each development's portion of impact shall be paid to implement the following improvement. The north and south legs of Azusa Street at the Badillo Street intersection shall be modified to provide a third through lane. The additional through lane shall be accommodated by narrowing of the median island, removal of dedicated right-turn lanes, new roadway striping, and removal of 5 existing curbside parking spaces along the west side of Azusa Avenue and 7 existing curbside parking spaces along the east side of Azusa Avenue, south of the intersection. The modified northbound and southbound approach lane configurations would consist of one left-turn lane, two through lanes, and one shared through/right-turn lane.</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact TR-2: The Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).		Less than significant	None required	Less than significant
Impact TR-3: The Project would not 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	None required	Less than significant
Impact TR-4: The Project would not result in inadequate emergency access.		Less than significant	None required	Less than significant
Cumulative		Significant	Mitigation Measures TR-2, listed above.	Less than significant
5.14 Tribal Cultural Resources				
Impact TCR-1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).		Less than significant	None required	Less than significant
Impact TCR-2: The Project would not cause a substantial adverse change in the significance of 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, that considers the significance of the resource to a California Native American tribe.		Potentially significant	Mitigation Measure TCR-1: Native American Monitoring and Sensitivity Training and Inadvertent Discoveries. Prior to the issuance of any permits for initial site clearing (such as pavement removal, grubbing, tree removals) or issuance of permits allowing ground-disturbing activities (including as boring, grading, excavation, drilling, potholing or auguring, and trenching), the City of Covina shall ensure that the project applicant/developer retain qualified Native American Monitor(s) to provide Native American Indian Sensitivity Training for construction personnel and to provide for on-call monitoring services in the	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>event of an inadvertent discovery of a potential tribal cultural resource.. The monitor(s) shall be approved by the tribal representatives of the Gabrieleno Band of Mission Indians - KizhNation. The monitor shall conduct a Native American Indian Sensitivity Training for construction personnel. The training session includes a handout and focus on how to identify Native American resources encountered during earthmoving activities and the procedures followed if resources are discovered.</p> <p>In the event that tribal cultural resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can also be evaluated by a Native American monitor in cooperation with a qualified archaeologist to determine if the potential resource meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique resource (Public Resources Code 21083.2(g)). Construction activities could continue in other areas. If the find is considered an "archeological resource" the Native American monitor in cooperation with the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4. If unique a tribal cultural resource cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the project applicant's/developer's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			preservation in an established accredited professional repository	
Cumulative		Potentially significant	Mitigation Measure TCR-1: Native American Monitoring, listed above.	Less than significant

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2. Introduction

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Project. This EIR has been prepared by the City of Covina in its capacity as Lead Agency, as that term is defined in Section 15367 of the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) and in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This EIR has been prepared to identify, analyze, and mitigate the significant environmental effects of the proposed Project.

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze Project impacts, analyses and conclusions regarding the level of significance of impacts both before and after mitigation, the identification and application of mitigation measures to avoid or reduce Project-related impacts, and the consideration of alternatives to the proposed Project. In preparing this EIR, the City of Covina has employed CEQA and environmental technical specialists; however, the analyses and conclusions set forth in this EIR reflect the independent judgment of the City as Lead Agency.

2.1 PURPOSE OF AN EIR

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. Pursuant to the provisions of CEQA Guidelines Section 15121(a), this EIR is intended as an informational document to inform public agency decision makers and the general public of the significant environmental effects of the proposed Project, identify possible ways to avoid or minimize those significant effects, and describe reasonable alternatives to the Project that might avoid or lessen significant environmental effects. Thus, this EIR is intended to aid the review and decision-making process.

The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

Given the multiphase nature of the proposed Project and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions to implement the proposed Project, this document has been prepared as a Program EIR for the overall Covina Bowl Specific Plan, pursuant to Section 15168 of the CEQA Guidelines, and as a Project EIR for the pending

development project that is a component of the overall proposed project, pursuant to Section 15161 of the CEQA Guidelines.

Program EIR

A Program EIR examines the total scope of environmental effects that would occur as a result of buildout of the entire Covina Bowl Specific Plan. By examining the full scope of the proposed Project and subsequent applications and approvals at this early stage of planning, the Program EIR will provide a full disclosure of the environmental impacts that may occur throughout the project site, together with an analysis of the site-specific and cumulative environmental impacts that will occur throughout the build-out timeframe of the proposed Project.

This Draft EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR provides the City of Covina (as lead agency) the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the City with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether additional CEQA documentation needs to be prepared. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope and additional environmental documents may not be required (CEQA Guidelines Section 15168[c]).

When a Program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into the subsequent activities (CEQA Guidelines Section 15168[c][3]). If a subsequent activity would have effects not within the scope of the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis.

Project EIR

A Project EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. This Draft EIR fulfills the requirements for a Project EIR and shall examine the pending development project for of the overall project (Planning Areas 1 and 2) for which development applications are currently on file with the City.

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

2.2 EIR SCOPE AND CONTENT

Impacts Found to Be Potentially Significant. The City determined that an EIR should be prepared for the Covina Bowl Mixed-Use Project. As a result, a Notice of Preparation (NOP) was prepared and circulated between January 23, 2020 and February 24, 2020 for the required 30-day review period. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR. The NOP and written responses to the NOP are contained in Appendix A of this Draft EIR. The City of Covina also held a scoping meeting for the Project to solicit oral and written comments from the

public and public agencies. The public scoping meeting was held on February 3, 2020. Comments received at the meeting are contained in Appendix A of this EIR. Topics requiring a detailed level of analysis evaluated in this EIR have been identified based upon the responses to both the NOP and a review of the Project by the City of Covina. The City determined through the initial review process that impacts related to the following topics are potentially significant and required a detailed level of analysis in this EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services and Recreation
- Transportation
- Tribal Cultural Resources

Impacts Found Not to Be Significant. CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment”. Topics that have been determined not to be significant and are therefore are not discussed in detail in the EIR were identified based upon the responses to the NOP and a review of the Project by the City of Covina. The City determined through the initial review process that impacts related to the following topics are not potentially significant and are not required to be analyzed in this EIR:

- Agriculture & Forest Resources
- Biological Resources
- Mineral Resources
- Population and Housing
- Utilities and Service Systems
- Wildfire

2.3 EIR PROCESS

Notice of Preparation/Initial Study

Pursuant to the requirements of CEQA, the City of Covina, as Lead Agency, prepared a Notice of Preparation (NOP) for the proposed Project, which was distributed on January 23, 2020 for a 30-day public review and comment period that ended on February 24, 2020. The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP are included in Appendix A and summarized in Table 2-1, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

Table 2-1: Summary of NOP/Initial Study Comment Letters

Comment Letter and Comment	Relevant EIR Section
State Agencies	
State Clearinghouse, January 23, 2020	
This letter provides a copy of the State Clearinghouse NOP form that was sent to responsible state agencies and states that responsible agencies must submit comments on the scope of the NOP within 30 days of receipt of the NOP from the lead agency. The letter also provides the State Clearinghouse number for the CEQA documents (2020010334).	EIR Appendix A
State Department of Transportation/Caltrans, February 20, 2020	
<p>This letter provides details regarding the mission of Caltrans and recommends that the EIR should address the following comments:</p> <ol style="list-style-type: none"> 1. The proposed Project is adjacent to Interstate 10 (I-10). The comment recommends that when conducting the Transportation Impact Study, a VMT based approach should be used. In addition, the study should consider potential impacts to both I-10 and I-210 at the Azusa Avenue on- and off-ramps. 2. The comment recommends creating robust non-motorized connections to the Covina Metrolink Station that is approximately 1.5 miles away from the proposed Project. The comment suggests that this would improve the bike and pedestrian experience, which would have the potential to greatly reduce VMT. 3. The comment recommends that Project design should provide a robust connection to the existing Class II bike lane along Badillo Street to the south. The comment recommends continuing this bike lane through to Citrus Avenue and adding a Class II bike lane to San Bernardino Road, as proposed by the City of Covina Bicycle Master Plan. Both facilities should apply high visibility green paint as an added measure of visibility and safety. <p>The letter also provides suggestions regarding safe, accessible multimodal transportation that would reduce pedestrian and bicyclist exposure to vehicles through design. Caltrans also recommends carefully considering the amount of parking required.</p> <p>The letter further states that any transportation of heavy construction equipment and/or materials which require use of oversized-transport vehicles of State highways will need a Caltrans transportation permit, and that large size truck trips should be limited to off-peak commute periods.</p>	Air Quality, Greenhouse Gas Emissions, & Transportation
Regional Agencies	
Los Angeles Conservancy, February 24, 2020	
<p>This letter provides details regarding the mission of the Los Angeles Conservancy, a background of the proposed Project, and the Conservancy's interest in the Project's environmental impacts. The Los Angeles Conservancy details its appreciation that the proposed Project would partially retain and reuse the historic Covina Bowl building and sensitively incorporate new construction on the site.</p> <p>The Los Angeles Conservancy also suggests that the Project would have significant impacts and requires a range of preservation alternatives to be evaluated and adequate mitigation measures proposed as part of the</p>	Aesthetics, Cultural Resources & Tribal Cultural Resources

Comment Letter and Comment	Relevant EIR Section
<p>environmental review process. The letter suggests that the Draft EIR should evaluate the following treatment options and mitigation measures for the Project:</p> <ol style="list-style-type: none"> 1. The letter recommends that special attention be given to the primary façade, main entry, and entertainment areas built in 1955 for adaptive reuse as it comprises the only remaining section of the historic Covina Bowl. 2. The letter suggests that the proposed Project has a large number of proposed units and questions the new construction and its potential to overpower the historic fabric of the remaining Covina Bowl. The letter recommends that the new construction should be compatible with the Secretary of the Interior's Standards for Rehabilitation. 3. The letter recommends that the Draft EIR should thoroughly study potential direct and indirect impacts of the project on the historic building, including any exterior and interior modifications and the proposed new construction. 4. The letter recommends that the Draft EIR should also include a detailed historic preservation plan that outlines recommended treatment options for the Covina Bowl's historic exterior and interior features. The plan should demonstrate adherence to the Secretary of the Interior's Standards and ensure that the building retains its eligibility as a historical resource. It should also include a full historic structures report (HSR), which would document and assess the building's unique existing conditions and provide clear guidelines for the appropriate treatments. 5. The letter details that the Covina Bowl has been formally determined eligible for the National Register of Historic Places, and the Conservancy strongly urges the project applicant and owner to move forward with the nomination and agree to listing as a form of mitigation and to offer additional economic incentives. 6. The letter details the construction of the proposed Project, and recommends that the Draft EIR should fully analyze and discuss the impacts of the proposed new construction on aesthetics and cultural resources, as well as provide detailed drawings to demonstrate the relationships between the new and historic buildings. 7. The letter recommends that the new buildings should be designed in a manner that is both compatible and appropriate in terms of scale, massing, height, design, and materials to the historic building, in accordance with the Secretary of the Interior's Standards. The letter further recommends that the buildings should be sufficiently set back and detailed as to not overwhelm or compete with the historic building and should maintain the Covina Bowl's historic focal point and front entrance orientation as part of the proposed Project. <p>The letter also provides further details regarding the Los Angeles Conservancy and its mission.</p>	
County of Los Angeles Fire Department, February 21, 2020	

Comment Letter and Comment	Relevant EIR Section
<p>This letter provides details regarding the Project. The letter identifies the following comments:</p> <ol style="list-style-type: none"> 1. The letter requests that within Section 15, Public Services, of the Initial Study, under Subsection (a) Fire Protection, the paragraph under this section should correct the closest fire station located at 807 Cypress Street in Covina to Fire Station 152. The letter details that further comments would be reserved for the Draft EIR. 2. The letter further suggests that the development of the project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. The letter further provides a breakdown of these applicable code and ordinance requirements. 3. The letter details that the Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department recommends that a Phase I ESA be conducted for the Project site, if not done so already. 	Public Services
South Coast Air Quality Management District, February 20, 2020	
<p>This letter references the SCAQMD's CEQA Air Quality Handbook and recommends using the methodologies of the Handbook to evaluate impacts of the Project, including use of the CalEEMod model, recommended regional significance thresholds, and localized significance thresholds (LSTs) or dispersion modeling. The letter recommends a mobile health risk assessment related to diesel particulate matter (DPM) from heavy-duty diesel-fueled vehicles. In addition, it recommends using the adopted Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. Impacts associated with implementing mitigation measures and a meaningful discussion of alternatives is also recommended. The comment also states that the EIR should include the following information:</p> <ul style="list-style-type: none"> • Disclosure on potential health impacts to prospective residents from living in proximity to industrial and warehouse uses, and the reduced effectiveness of air filtration system when windows are open and when residents are outdoor; • Identification of the responsible implementing and enforcement agency such as the Lead Agency for ensuring that enhanced filters are installed on-site at the proposed Project before a permit of occupancy is issued; • Identification of the responsible implementing and enforcement agency such as the Lead Agency's building and safety inspection unit to provide periodic, regular inspection on filters; • Provide information and guidance to the Project developer or proponent on the importance of filter installation and ongoing maintenance; • Provide information to residents about where the MERV filters can be purchased; • Disclosure on increased costs for purchasing enhanced filtration systems to prospective residents; • Disclosure on increased energy costs for running the HVAC system with MERV filters to prospective residents; • Disclosure on recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units to prospective residents. 	Air Quality & Greenhouse Gas Emissions
Southern California Association of Governments, February 24, 2020	

Comment Letter and Comment	Relevant EIR Section
<p>This letter states that Southern California Association of Governments (SCAG) is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372 and the clearinghouse for regionally significant projects and reviews projects for consistency with local and regional plans. The letter provides a list of the 2016 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) Goals and Strategies that may be applicable to the proposed Project. In addition, the letter provides the SCAG Regional Growth Forecast data for the SCAG region and the City of Covina. The letter also recommends review of SCAG recommended mitigation measures from the 2016 RTP/SCS Final EIR.</p>	<p>Transportation, Population and Housing</p>
Native American Heritage Commission, January 23, 2020	
<p>This letter provides details regarding the mission of the Native American Heritage Commission, a background of AB 52 and SB 18, and the Native American Heritage Commission's interest in the Project's cultural and historical impacts. The letter also details the requirements for CEQA compliance with AB 52 and SB 18, as well as the NAHC Recommendations for Cultural Resources Assessments.</p>	<p>Cultural Resources & Tribal Cultural Resources</p>
Individual Comments	
Adriene Biondo, February 24, 2020	
<p>The letter details the Friends of Covina Bowl's appreciation for the public scoping meeting and the consideration of the City, developer, and historic preservation consultant for the proposed Project. The letter also details the following concerns:</p> <ol style="list-style-type: none"> 1. The Draft EIR should include a comprehensive historic preservation plan that covers the treatment options for Covina Bowl's historic exterior, main sign, and interior features. This section of the plan needs to follow the Secretary of the Interior's Standards and - very importantly - ensure that the building retains its eligibility as it is a designated historical resource. A comprehensive historic structures report with guidelines for the appropriate treatments should also be provided. 2. The Draft EIR should also analyze impacts of the proposed new construction, covering aesthetics and cultural resources. Detailed drawings demonstrating the relationships between proposed new construction and historic buildings should also be drafted. 3. New construction should be compatible in style, scale, massing and using materials appropriate to the historic building with setbacks that neither overwhelm nor compete with the historic building. 4. In the preliminary renderings presented at the scoping meeting, the design of the new buildings needed to be further refined, and presented in elevation drawings. It also seems that more of the historic building facade to the left of the main entrance needs to be retained in order to give the entire project balance. 5. Inside, demolition of the low wall that runs the length of the main concourse needs to be reconsidered. This mosaic tile covered "half-wall" was covered by the last operator but it is an important extant feature of the bowling alley. 6. The vintage interior features of the coffee shop/restaurant also need to be carefully considered. This authentic historic coffee shop offers a rare opportunity to reconnect with the community as a future coffee shop/restaurant/eatery. 	<p>Aesthetics & Cultural Resources</p>

Comment Letter and Comment	Relevant EIR Section
Dante Pascual, Jr., February 24, 2020	
<p>The letter details the commenter's appreciation for the public scoping meeting and that the Project would partially save the Covina Bowl. The letter also details the following concerns and recommendations for the proposed Project:</p> <ol style="list-style-type: none"> 1. Although the city has made great strides in protecting the most iconic parts of the structure such as Covina Bowl sign, portecochere and the part of the wall I'd still would like to see more of the structure preserved. For instance, the wall left of the main entrance in which most will be removed and only a portion remain. At least 4 bays or panels will be left standing. Removing so much of that facade wall creates a visual imbalance. I think by extending or keep at least 6 bays or panels will help keep the structure in visual harmony. 2. I'd also advocate for the coffee shop to remain. I think that having a restaurant will at least keep the memory of Covina Bowl alive since the bowling alley has been completely removed. It would only be the place left of Covina Bowl the community to have that connection to its past and could still feel that one could walk and experience the structure as they once did. 3. Inside the I'd love to see the low wall in the concourse preserved. It's an original part of the bowling alley that should be reconsidered since it still has all or most of the original mosaic intact. Removing that original tile would be of a great disservice to the structure. I'm sure the architects have to follow the Secretary of the Interior's Standards, but I think can still benefit in the design as long it's preserved thoughtfully without it being an obstruction to the new design. 4. The new construction I feel is nothing new I've seen. In fact, it looks like many designs I've already seen in and around the south bay and in San Diego. This is not to say that they're identical but they share a common aesthetic that makes it seem like a kind of default design. The new designs are not unique. Further, looking at the main entrance of the Covina Bowl and the new townhomes to its left, both structure are incongruous of each other visually and that they are independent of each other. The new designs of the townhomes look unrelated to the Covina Bowl in spirit and in aesthetics. I wish there was a common thread between the structures that made them coordinated. 	Aesthetics & Cultural Resources
Unsigned, Undated	
<p>The letter raises concerns regarding the design of the housing units along Rimsdale Avenue, and details concerns over the proposed design and suggests that this particular section of housing deserves special attention. The letter also suggests that the entrance canopy on the former Covina Bowl should be retained and details the significance of its features. The letter further suggests that the former coffee shop within the former Covina Bowl should be revitalized and reused as part of the Project, and requests that this feature fully be explored due to its importance.</p>	Aesthetics, Cultural Resources & Land Use and Planning

Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Covina hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the EIR for the proposed Project. The scoping meeting was held on February 3, 2020 at 6:00 p.m. at the City of Covina Senior and Community Center located at 815 N. Barranca Avenue in Covina.

Numerous members from the Friends of the Covina Bowl Facebook group attended the meeting and raised concerns about the proposed architecture and historic preservation of the former Covina Bowl, specifically the preservation of the former coffee shop for adaptive reuse. Potential impacts related to the historic preservation of the Covina Bowl are described in Section 5.1, *Aesthetics*, and Section 5.3, *Cultural Resources*, and Section 5.9, *Land Use and Planning*, and cumulatively considerable impacts are evaluated throughout Chapter 5 of this Draft EIR.

In addition, members of the public attended the meeting and raised concerns about potential traffic impacts from the proposed Project, and also recommended analysis of an additional study intersection at Arnel Drive and Badillo Street within the Traffic Impact Analysis. Potential traffic impacts related to the proposed Project are described in Section 5.13, *Transportation*, and the Traffic Impact Analysis for the Project provided as Appendix K. Cumulatively considerable traffic impacts are also evaluated within Section 5.13, *Transportation*, of this Draft EIR.

Public Review of the Draft EIR

The City of Covina filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that this EIR has been completed and is available for review. A Notice of Availability of the Draft EIR was published concurrently with distribution of this document. The Draft EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR is available for public review digitally on the City's website: (<https://covina.ca.gov/pc/page/projects-under-review>) or physically at the following location:

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

Written comments related to environmental issues in the Draft EIR should be addressed to:

Mercy Lugo, Associate Planner
City of Covina, Planning Division
125 E. College Street
Covina, CA 91723
Email: mlugo@covina.ca.gov

Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final EIR will be considered. These comments, and their responses, will be included in the Final EIR for consideration by the City, as well as other responsible agencies per CEQA. The Final EIR may also contain corrections and

additions to the Draft EIR, and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to consideration of its certification by the City. Notice of the availability of the Final EIR will be sent to all who commented on the Draft EIR.

2.3 ORGANIZATION OF THIS DRAFT EIR

The Draft EIR is organized into the following Sections. To help the reader locate information of interest, a brief summary of the contents of each chapter of this Draft EIR is provided.

- **Section 1 Executive Summary:** This section provides a brief summary of the Project site, the proposed Project, and alternatives. The section also provides a summary of environmental impacts and mitigation measures that lists each identified environmental impact, applicable Project design features, standard conditions, proposed mitigation measure(s) (if any), and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either less than significant or significant and unavoidable.
- **Section 2 Introduction:** This section provides an overview of the purpose and use of the EIR, the scope of this EIR, a summary of the legal authority for the EIR, a summary of the environmental review process, and the general format of the document.
- **Section 3 Project Description:** This section provides a detailed description of the proposed Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4 Environmental Setting:** This section provides a discussion of the existing conditions within the Project site.
- **Section 5 Environmental Impact Analysis:** This section includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the proposed Project; any applicable Project design features; standard conditions and plans, policies, and programs that could reduce potential impacts; and the feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable.

This section also summarizes the significant and unavoidable impacts that would occur from implementation of the proposed Project and provides a summary of the environmental effects of the implementation of the proposed Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the proposed Project.

- **Section 6 Alternatives:** This section describes and analyzes a reasonable range of alternatives to the proposed Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is also identified.
- **Section 7 Report Preparation:** This section lists authors of the Draft EIR, associated technical studies, and City staff that assisted with the preparation and review of this document.

2.4 INCORPORATION BY REFERENCE

In accordance with Section 15150 of the CEQA Guidelines and to reduce the size of the report, the following documents are hereby incorporated by reference into this EIR and are available for public review at the City of Covina, Planning Division, 125 E. College Street, Covina, CA 91723. A brief summary of the scope and content of these documents is provided below.

City of Covina General Plan: The City of Covina General Plan provides a general, comprehensive, and long-range guide for community decision-making. Each element of the General Plan addresses a certain aspect of the City's growth and development. The individual elements identify goals and policies for existing and future conditions within the City. The following elements comprise the City's General Plan:

- Land Use (adopted April 18, 2000)
- Circulation (adopted April 18, 2000)
- Housing (revised December 10, 2010)
- Natural Resources and Open Space (adopted April 18, 2000)
- Safety (adopted April 18, 2000)
- Noise (adopted April 18, 2000)

The General Plan is utilized throughout this document as a fundamental planning document governing development within the City. Background information and policy information from the General Plan is cited in various sections of this EIR.

Covina Municipal Code: The City of Covina Municipal Code consists of regulatory, penal, and administrative ordinances of the City. The Municipal Code guides the City's control of land uses, in concert with General Plan goals, objectives, and policies. The City's Zoning Code (Title 17 of the Municipal Code) identifies land uses permitted and prohibited according to the zoning category of particular parcels. The Municipal Code and Zoning Code are utilized throughout this document as a regulatory document governing development and land use activities within the City. Regulatory information from the Municipal Code and Zoning Code is cited in various sections of this EIR.

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3.0 Project Description

3.1 PROJECT LOCATION

The proposed 7.5-acre Covina Bowl Specific Plan (“Project,” “proposed Project, or “Specific Plan”) is located within the western portion of the City of Covina. As depicted in Figure 3-1, *Regional Location*, the City of Covina is in the San Gabriel Valley region of Los Angeles County, approximately 22 miles east of downtown Los Angeles, 35 miles west of downtown San Bernardino, and 10 miles northeast of Orange County.

As depicted on Figure 3-2, *Local Vicinity*, the Specific Plan area is bounded by N. Rimsdale Avenue to the east, W. San Bernardino Road to the north, and W. Badillo Street to the south. Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately 0.20 miles to the east. Local access is provided by W. San Bernardino Road, W. Badillo Street, and N. Rimsdale Avenue (“Specific Plan area” or “Project site”).

The Specific Plan area is within the southwest quarter of Section 15, Township 1 South, Range 10 West, San Bernardino Base and Meridian as depicted on the U.S. Geological Survey (USGS) Baldwin Park 7.5- minute quadrangle.

Refer to EIR Section 4.0, *Environmental Setting*, for more information related to the regional and local setting of the Specific Plan area.

3.2 ON-SITE AND SURROUNDING LAND USES

The Project site is currently developed with approximately 110,542 square feet of commercial and residential uses that includes: the single-story Covina Bowl building, a vacant daycare building, a church, a two-story 31-unit residential apartment complex (Continental Garden Apartments), and a detached single-story restaurant (Mar Y Tierra). The existing on-site and surrounding land uses are shown in Figure 3-3, *Existing On-site Land Uses* and identified on Table 3-1, *Existing Onsite Land Uses*.

Table 3-1: Existing Land Uses within the Specific Plan Area

Parcel #	Address	APN	Acres	Building SF	Land Use
1	1118 W. San Bernardino	8434-017-007	1.71	32,589	Restaurant, Residential
2	1060 W. San Bernardino	8434-018-020	4.28	69,138	Vacant Bowling Alley (former Covina Bowl)
3	1103 W. Badillo Street	8434-017-008	0.56	2,994	Vacant Daycare
4	1111 W. Badillo Street	8434-017-009	0.58	1,646	Church
5	1085 W. Badillo Street	8434-018-021	0.35	4,175	Office

Chain-link fencing currently surrounds the vacant daycare that is located on the southwestern portion of the Project site, and a concrete block wall separates the parking areas for the Covina Bowl from adjacent land uses to the west. Lighting is located in parking areas and on the exterior of the buildings. On-site ornamental landscaping includes lawns, shrubs, and trees along the site boundaries.

Historic Covina Bowl

The Covina Bowl building was constructed in 1955, an office addition and additional lanes were constructed in 1963, and operations ceased in 2017. It consists of an Egyptian-themed bowling center with a flat roof and steel frame construction with tilt-up precast concrete walls. The building is easily identifiable by its

pyramid shaped entrance and 60-foot high reverse triangular neon sign. The most architecturally significant portions of the former Covina Bowl building would be preserved as part of the proposed Project, as discussed in further detail below.

Surrounding Land Uses

The Project area is located in a portion of City of Covina that is developed and urban, with commercial and retail uses to the north; multi-family and retail uses to the west; office and retail uses to the east; and single-family residential uses to the south, as depicted in Figure 3-4, *Surrounding Land Uses*. The Project site is bound by W. San Bernardino Road, which is a 4-lane secondary arterial roadway to the north; N. Rimsdale Avenue, a 2-lane collector roadway to the east; and W. Badillo Street, a 4-lane primary arterial roadway to the south. The existing street parkways include sidewalks, with some portions containing trees and other landscaping.

3.3 EXISTING CITY OF COVINA LAND USE DESIGNATIONS

General Plan Designations

As depicted on Figure 3-5, *Existing General Plan Land Use Designations*, the existing land use designations within the Specific Plan area includes a mix of commercial and residential land uses. As shown in Table 3-2, *General Plan Land Use Designations*, the General Commercial land use designation applies to 77 percent of the Specific Plan area and the High Density Residential land use designation applies to 23 percent of the Specific Plan area.

Table 3-2: Existing General Plan Land Use Designations

Land Use	Acres	Percentage of the Specific Plan area
General Commercial	5.83	77%
High Density Residential	1.71	23%
Total	7.54	100%

The General Commercial designation has a maximum Floor Area Ratio (FAR) of 1.5. The designation is characterized by an array of uses and building types including retail, office, and services, and is generally along major streets or at primary street intersections. The specific types of 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 lots¹.

The High Density Residential designation has a maximum non-residential FAR of 0.5 and a residential density of 14.1 to 22 dwelling units per acre, which include apartments (two-unit structures and up), condominiums, townhouses, mobile homes. Also permitted are single-family detached houses on individual lots and State-defined granny flat units and group homes, and institutional uses, such as churches, large group houses, convalescent hospitals, meeting halls/lodges, and nursery schools plus governmental and utility facilities.

Zoning Designations

As shown in Figure 3-6, *Existing Zoning* and Table 3-3, *Existing Zoning Designations*, the Specific Plan area is zoned Regional or Community Shopping Center (C-3A), Multiple Family (RD-1500), and Administrative

¹ General Plan Land Use Element, page A-31

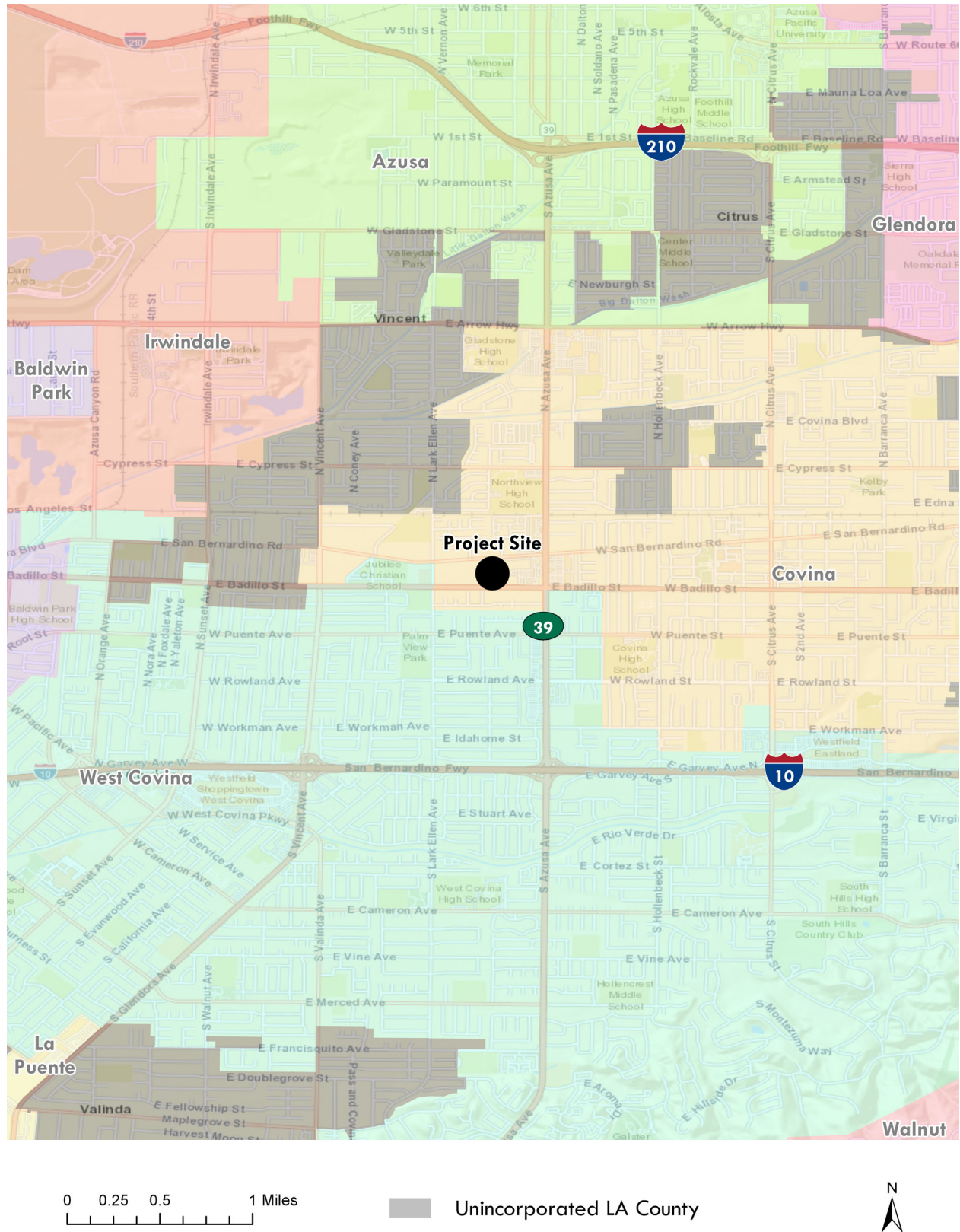
and Professional Office (C-P). As shown on Table 3-3, *Existing Zoning Districts*, 73 percent of the Specific Plan area is zoned as Regional or Community Shopping Center (C-3A).

Table 3-3: Existing Zoning Designations

Land Use	Acres	Percentage of the Specific Plan area
Regional or Community Shopping Center (C-3A)	5.48	73%
Multiple Family (RD)	1.71	23%
Administrative and Professional Office (C-P)	.35	4%
Total	7.54	100%

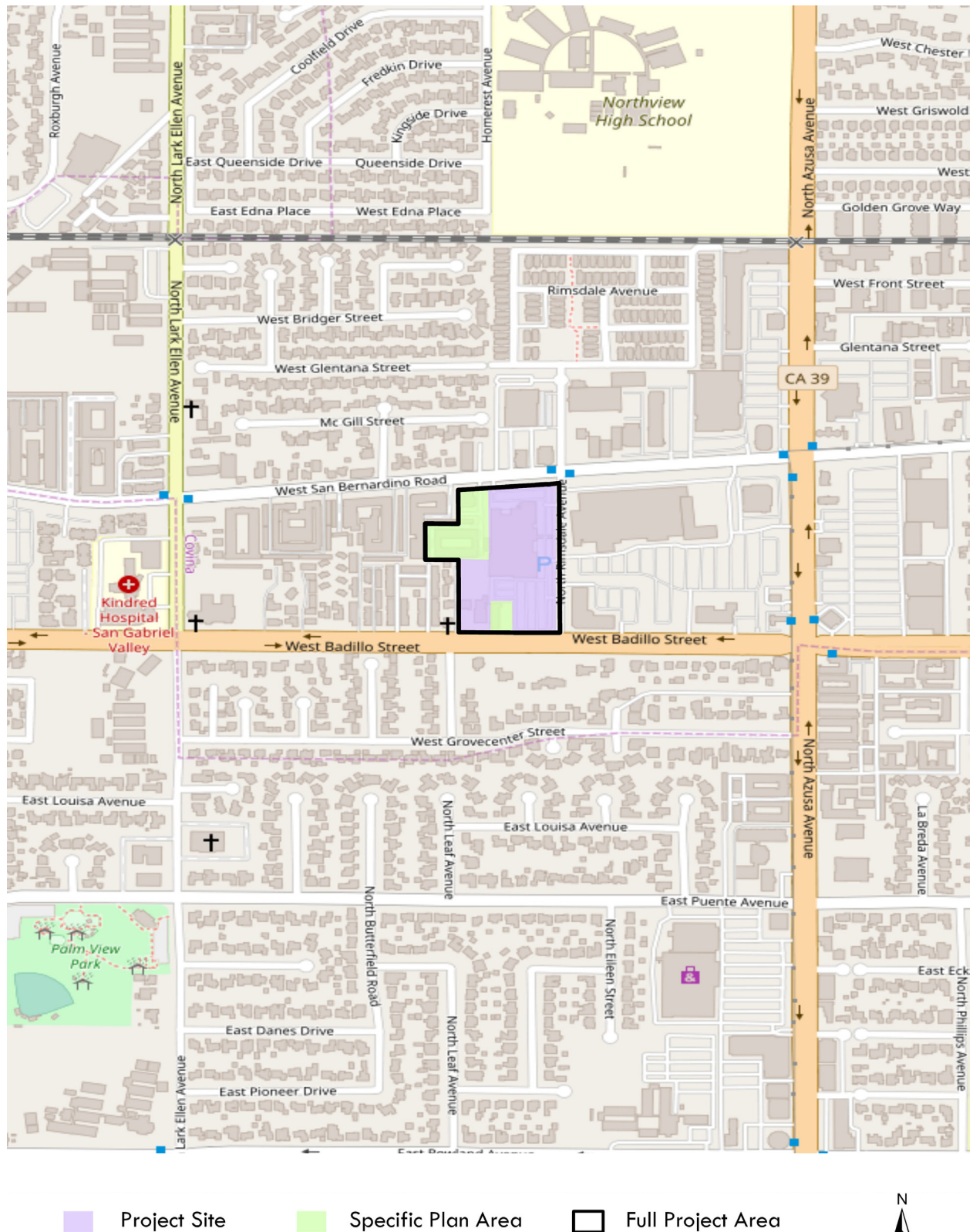
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Regional Location



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Local Vicinity



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Existing Onsite Land Uses

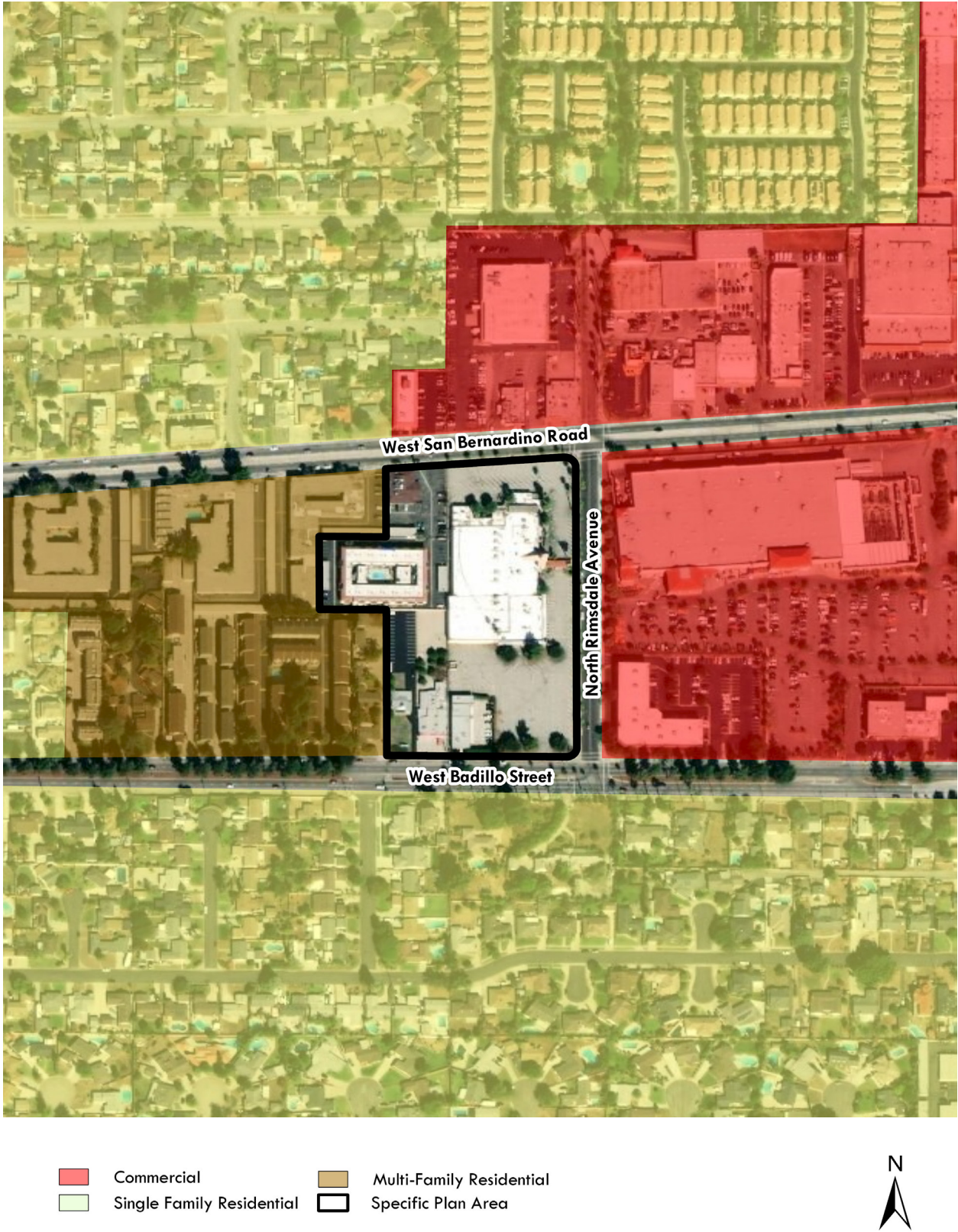


- | | | |
|--|---|---|
| Restaurant, Residential | Vacant Day Care | Specific Plan Area Boundary |
| Church | Commercial | Vacant Bowling Alley |



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Surrounding Land Uses



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Existing General Plan Land Use Designations

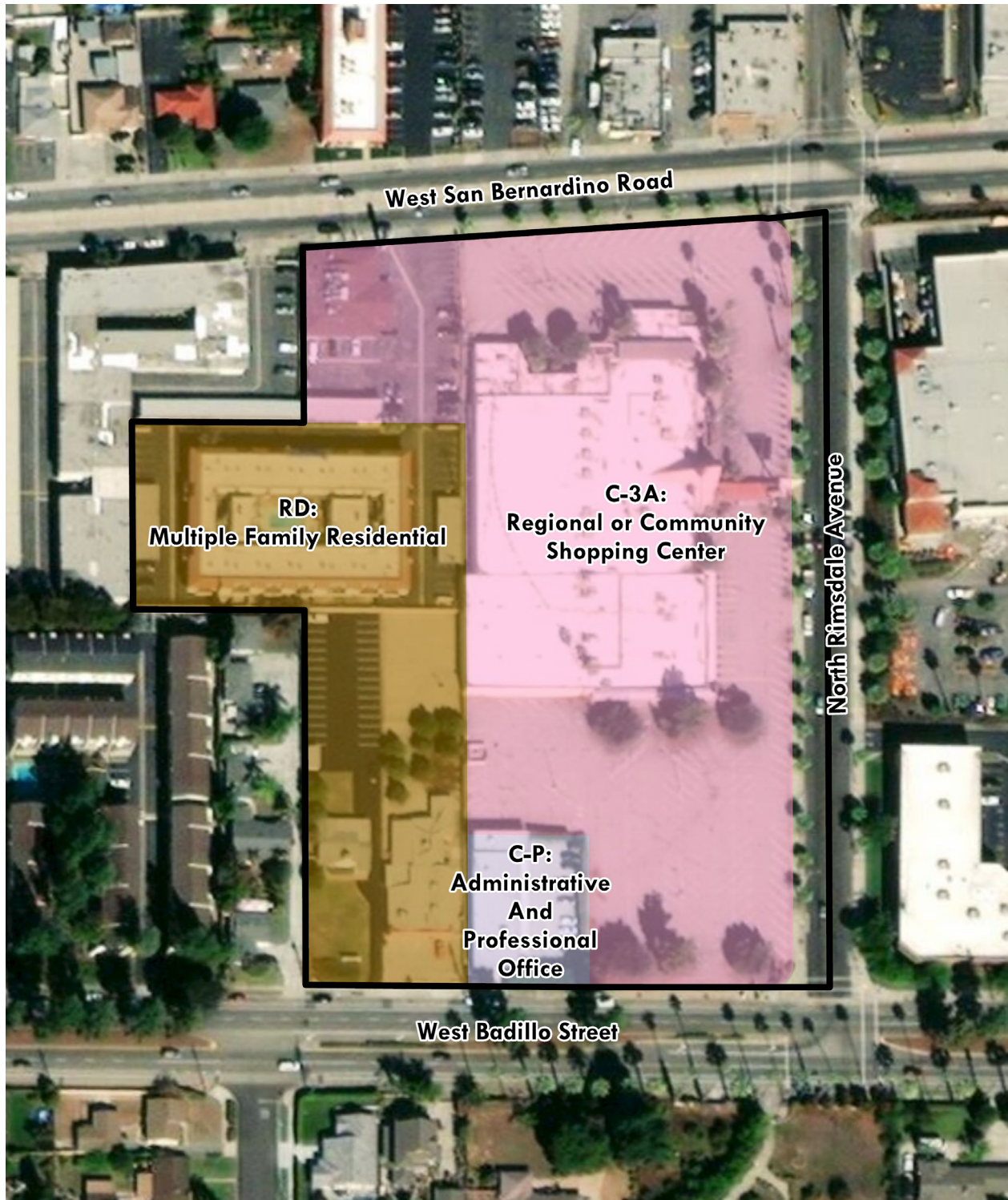


□ Specific Plan Area Boundary



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Existing Zoning



□ Specific Plan Area Boundary



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3.4 SPECIFIC PLAN GOALS AND OBJECTIVES

Section 15124(b) of the State CEQA Guidelines (14 California Code of Regulations [CCR]) requires “A statement of objectives sought by the proposed project. A clearly written statement of objectives would help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and would aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.” The proposed Specific Plan Project has identified the following goals and objectives:

- Preserve the historic Covina Bowl through adaptive reuse;
- Provide new residential, commercial, and office development opportunities to revitalize the plan area;
- Eliminate split zoning across parcels and encouraging the planned development of the properties within the plan area that accommodate a range of land uses to meet evolving market demands;
- Provide a more flexible regulatory procedure by which the objectives of the City’s General Plan and Zoning Code can be realized;
- Encourage creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of office, residential and commercial land uses and activities;
- Eliminate and prevent the spread of blight by revitalizing and rehabilitating vacant buildings;
- Strengthen the City’s economic base by revitalizing the plan area to its full economic potential;
- Provide for-sale multifamily residential with a range of sizes to encourage first-time homebuyers;
- Ensure new residential development includes adequate open space and high quality recreational amenities for future residents;
- Bolster an economically vibrant and active walkable environment through introduction of mixed uses.
- Draw more patrons to surrounding commercial uses and expand walkability through enhanced pedestrian-oriented development within the plan area.
- Enhance the appearance of the community by redeveloping and upgrading the properties and street frontages within the Specific Plan area through creative site planning, high quality architecture, enhanced landscaping and lighting, while embracing the character of the historic Covina Bowl; and
- Transform street frontages and create neighborhood connectivity through pedestrian-oriented improvements and diagonal on-street parking spaces on N. Rimsdale Avenue.

3.5 PROJECT SUMMARY

3.5.1 PROPOSED PROJECT

The City of Covina is proposing the Covina Bowl Specific Plan to guide infill redevelopment of an approximately 7.5-acre site and dividing the site into four Planning Areas, which are described in further detail in the following subsections. The proposed Specific Plan considers maximum development of all portions of the plan area, as summarized:

- Adaptive reuse of the Covina Bowl building to provide 12,000 square feet commercial/office uses within Planning Area 1;

- Development of 132 for sale multi-family residential units within 16 three-story buildings in Planning Area 2;
- Future removal of the existing office space and redevelopment development of either 4,175 square-foot of retail or 11 multi-family residential units within Planning Area 3; and
- Future removal and removal of the existing 31-unit apartment building and redevelopment with either 37,244 square feet of retail space or 52 multi-family residential units.

The proposed Project also includes the enlargement of the westside of the existing N. Rimsdale Avenue right-of-way (i.e., along the easterly property frontage) to allow for the addition of angled on-street parking spaces.

In addition to the Covina Bowl Specific Plan, the proposed Project includes the development of a portion of the plan area. An application has been filed by Trumark Homes (Project Applicant) requesting approval of a Vesting Tentative Tract Map and Major Site Plan Review to allow the construction and operation of a mixed-use development that includes adaptive reuse of the Covina Bowl building to provide 12,000 square feet commercial/office uses within Planning Area 1 and development of 132 for sale multi-family residential units within 16 three-story buildings in Planning Area 2.

Given the multiphase nature of the proposed Project and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions to implement the proposed Project, this document has been prepared as a Program EIR for the overall Covina Bowl Specific Plan, pursuant to Section 15168 of the CEQA Guidelines, and as a Project EIR for the pending development project that is a component of the overall proposed Project, pursuant to Section 15161 of the CEQA Guidelines. This EIR analyzes the construction and operation of 132 multi-family residential units and the adaptive reuse the Covina Bowl building for 12,000 SF of commercial/office space within Planning Areas 1 and 2, as well as the N. Rimsdale Avenue right-of-way improvement, at a project-specific level (Development Project) by opening year 2024. The Draft EIR analyzes the full buildout of the Specific Plan at a program level by future year 2040.

3.5.2 SPECIFIC PLAN

The Covina Bowl Specific Plan proposes establish a land use plan, development standards, and design guidelines to direct redevelopment of the 7.5-acre site in accordance with the vision, goals, and policies of the Covina General Plan. In accordance with the provisions of Chapter 17.02² of the City's Municipal Code, adoption of the Covina Bowl Specific Plan is sought in order to allow for enhancement and redevelopment of the site.

The California Government Code (Title 7, Division 1, Chapter 3, Article 8, Sections 65450–65457 [Specific Plans]) provides authority for a city to adopt a specific plan by ordinance (as a regulatory plan) or resolution (as a policy plan). When a specific plan is adopted by ordinance, the specific plan effectively replaces portions or all of the current zoning regulations for specified parcels and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted or define other types of design and permitting criteria. The Specific Plan would be adopted by the Covina City Council by ordinance and function as the regulatory document that serves as the implementing zoning for the Project site, thereby ensuring the orderly and systematic implementation of the City's General Plan. The Specific Plan would act as a bridge between the City's General Plan and development and redevelopment activity that would occur on the Project site.

It is intended that design review plans, detailed site plans, grading and building permits, or any other action requiring ministerial or discretionary approval applicable to the Project site be consistent with the intent of the Specific Plan. Subsequent projects determined to be consistent with the Specific Plan would likewise be determined to be consistent with the Covina General Plan.

² Covina Municipal Code. <https://www.codepublishing.com/CA/Covina/#!/Covina17/Covina1702.html#17.02>

Planning Areas

The proposed Specific Plan divides the 7.5-acre Project site into four planning areas, as shown in Figure 3-7, *Project Planning Areas* and listed in Table 3-4.

Table 3-4: Planning Areas

Address	APN	Acres	Existing Land Use	Proposed Land Use
Planning Area 1				
1060 W. San Bernardino	8434-018-020	0.96	Vacant Bowling (Covina Bowl)	Office/Commercial
Planning Area 2				
1060 W. San Bernardino	8434-018-020	4.54	Vacant Bowling (former Covina Bowl)	Residential
1103 W. Badillo Street	8434-017-008		Vacant Daycare	
1111 W. Badillo Street	8434-017-009		Church	
Planning Area 3				
1085 W. Badillo Street	8434-018-021	0.35	Office	Office/Commercial/Residential
Planning Area 4				
1118 W. San Bernardino	8434-017-007	1.71	Restaurant, Residential	Restaurant/Residential

The proposed Specific Plan would replace the the existing Regional or Community Shopping Center (C-3A) and Multiple Family (RD-1500) zoning districts with Covina Bowl Specific Plan (CBSP) designations. However, the commercial/office and residential land uses that are permitted by the the now-existing zoning designations would also be permitted and accommodated by the proposed CBSP designations.

The proposed uses and land use designations for each Planning Area of the Specific Plan are described below.

Planning Area 1: CBSP Commercial/Office

Planning Area 1 is 0.96 acres and is designed by the Specific Plan as Covina Bowl Specific Plan (CBSP) Commercial/Office, which allows for a variety of uses that include but are not limited to administrative offices, retail, coffee shop/bakery and other uses commonly found in neighborhood commercial zones. The Specific Plan identifies a maximum FAR of 1.5 for Planning Area 1, which is similar to the existing General Commercial land use designation. The Specific Plan includes demolition of the rear (west) mass, the south addition (1963), and portions of the northern part of the Covina Bowl building and adaptive reuse of the remaining building to provide approximately 12,000 square feet of commercial/office space. Parking lot and landscaping improvements would also occur within Planning Area 1. Vehicular access to Planning Area 1 would be provide by a driveway on N. Rimsdale Avenue.

Planning Area 2: CBSP Residential

Planning Area 2 is 4.54 acres and is designated by the Specific Plan for development of 132 multi-family residential units. The existing vacant daycare and church buildings would be demolished to provide for the proposed residences. The proposed residential units would consist of 40 flex town prototype units, as well as 92 towns/flats prototype units. The residential units would provide between one to four-bedroom units. On-site amenities for the residences include an outdoor lawn bowling area, outdoor dining barbeque area, and a tot lot area. Vehicular ingress and egress to Planning Area 2 would be from driveways on W. San Bernardino Road, N. Rimsdale Avenue, and W. Badillo Street.

Planning Area 3: CBSP Mixed Use

Planning Area 3 comprises 0.35 acres that is designated by the Specific Plan for mixed use development to provide for a range of office, commercial, residential, and retail uses. While no specific development is proposed at this time for Planning Area 3, the maximum potential buildout of Planning Area 3 is included as part of the Specific Plan buildout (Year 2040) condition, which assumes removal of the existing office building and development of 4,175 square-feet of retail space or 11 multi-family residential units per the standards of Planning Area No. 2. Vehicular access to Planning Area 3 would be provided by one driveway on W. Badillo Street.

Planning Area 4: CBSP Mixed Use

Planning Area 4 comprises 1.71 acres that is designated by the Specific Plan for mixed use development to provide for a range of residential, retail, office, and commercial uses. While no specific development is proposed at this time for Planning Area 4, the maximum potential buildout of Planning Area 4 is included as part of the Specific Plan buildout (Year 2040) condition, which assumes removal of the existing 31 apartment units, restaurant, and associated site improvements and development of 37,244 square feet of retail space or 52 multi-family residential units. Potential uses include, but are not limited to, food/restaurants/eating establishments, and residential. Vehicular access to Planning Area 4 would be provided by one driveway on W. San Bernardino Road.

3.5.2 PROPOSED DEVELOPMENT PLAN

In addition to the Specific Plan, the proposed Project would permit a mixed-use development that includes adaptive reuse of the Covina Bowl building to provide approximately 12,000 square feet commercial/office uses within Planning Area 1, and development of 132 for sale multi-family residential units within 16 three-story buildings in Planning Area 2 (See Figure 3-8, *Conceptual Site Plan* and Figure 3-9, *Tentative Tract Map*).

Planning Area 1: CBSP Commercial/Office. The Covina Bowl building would be rehabilitated to provide approximately 12,000 square feet of commercial/office space for administrative offices, retail, coffee shop/bakery, and other uses commonly found in neighborhood commercial zones. Change to the Covina Bowl building would include demolition of the rear (west) mass that previously contained the bowling lanes (removed in 2017) and the south addition (1963) and restoration of the remaining building.

The Covina Bowl building was determined to be eligible for listing in the National Register in 2016 and is listed in the California Register of Historic Resources (CRHR). The Covina Bowl has also been found eligible for local designation as a City Landmark. Therefore, the Specific Plan includes adaptive reuse of the building in compliance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards; Department of the Interior regulations 36 CFR 68) and includes the following features:

- **Massing and Form:** The Project would retain a majority of the original façade where the character-defining features are concentrated, including prominent A-frame entry and vertical baffles. The restoration/redesign of north end of the building would be guided by historic photos. The new west wall would be located in alignment with east edge of the concourse.
- **Roof:** The front A-frame roof would be retained and preserved/protected or repaired/restored, as needed, and the setback, height and design of new construction would not detract from its prominence. The original roofing should be assessed and preserved or repaired/restored, as needed. Added rooftop elements such as HVAC equipment would be screened from street view by utilizing shield effects of height, setback, and existing structures.
- **Walls:** The existing concrete walls would remain unsheathed, and necessary repairs would match in material and finish texture. New walls would be designed to be compatible with overall character of the building, existing material, and finish.

- **Fenestration:** Original windows would be repaired/restored, as needed, in original window openings. Missing windows in original openings would be replaced in kind. New windows or openings would not be introduced on the façade but are permissible on secondary elevations and should be designed to be consistent with original windows.
- **Entries:** The Project site entrance is marked by a 60-foot reverse triangular neon monument sign at N. Rimsdale Avenue that would be preserved and restored. The folded-plate canopy and entry assembly would be preserved and repaired. The Mayan-themed curved wall would be retained and restored, as necessary.

The Bouquet Canyon rock walls and piers at the courtyard and folded plate entry would be retained and remain unpainted. The triangular baffles on the façade should be retained, and the canopy at north concourse entry should be retained either in place or relocated into the design of the Project.

- **Interior:** The 10-foot-wide north-south green terrazzo concourse would be redeveloped with existing terrazzo materials and would lead to the proposed lawn bowling area. The coffee shop counter and service area would also be retained; and the dropped ceiling feature in dining room would be retained, if possible. In addition, the dropped ceiling in the entry area would be removed to expose and repair/restore the original full-height ceiling and entry windows.
- **Exterior Setting:** To maintain the exterior setting of the Project site the parking area would retain an L-shape by wrapping around the building. The Project would maximize the retention of landscape planters, mature landscaping, trees, and boulders; or relocating onsite if unable to retain in place or maintain health. The new landscaping would match in species whenever possible, or mimic existing plants in height, size, color, and foliage. The historic tiki lights in front planters would be repaired/restored.

The design of the new development would reference the character defining features and materials such as the folded plate angle, rock detail, and muted color palette to ensure the Covina Bowl and new construction are compatible.

Planning Area 2: CBSP Residential. The proposed development within Planning Area 2 consists of 132 for sale multi-family residential units that would be located within 16 three-story buildings. The proposed residential units would consist of 40 flex town prototype units, as well as 92 towns/flats prototype units with a range of one to four-bedroom configurations within the attached condominiums, as shown in Table 3-5 below. The residential buildings would be three stories with a height of approximately 37 feet from the ground surface to the top of the roof, as shown in Figures 10A and 10B, *Building Elevations*.

Table 3-5: Residential Summary

Flex Town Prototype							
Plan #	S.F.	Bedrooms	Residential Unit Type	Garage Spaces	# of Stories	Total Units	Total S.F.
1	1,576	4	3-Story Townhome	2	3	15	23,640
2	1,674	4	3-Story Townhome	2	3	25	41,850
<i>Total Flex Town Prototype Units</i>						40	65,490
Towns/Flats Prototype							
3	885	1	2-Story Flat	1	2	14	12,390
4	975	2	3-Story Townhome	1	3	12	11,700
5	1,175	2	2-Story Flat	2	2	12	14,100
6	1,584	3	3-Story Townhome	2	3	12	19,008
7	1,675	3	2-Story Flat	2	2	14	23,450
8	1,784	3	3-Story Townhome	2	3	14	24,976
9	1,921	3	3-Story Townhome	2	3	14	26,894
<i>Total Towns/Flats Prototype Units</i>						92	132,518
Total Residential Units						132	198,008

Parking

Vehicular parking spaces would be provided at a rate of approximately 2.10 spaces per residential unit and approximately 5 spaces per 1,000 square feet of commercial/office space. Thus, the proposed development would provide a total of 357 parking spaces: 240 residential parking spaces within attached 1-car (14 total parking spaces) and 2-car garages (236 total parking spaces), 32 commercial spaces (9' x 19'), and 37 diagonal on-street parking spaces on N. Rimsdale Avenue, which have been provided for both the residential and commercial/office uses within Planning Areas 1 and 2. The Project also proposes modifications to the N. Rimsdale Avenue right-of-way to create the diagonal parking along the Project site frontage. The proposed development includes bicycle parking in the commercial/office parking area to encourage bicycle transportation.

Open Space, Recreation, and Other Amenities

Residential units would include between 125 sf to 150 sf (15,820 sf total) of private open space. In addition, the proposed development would provide approximately 5,026 square feet of common open space and recreational area, which includes a 1,692 square foot area with: a playground, fitness park area with exercise equipment, outdoor dining BBQ area; and a 3,334 square foot lawn bowl area inspired by the historical use and architecture of the Covina Bowl building. The proposed development would provide total of approximately 20,820 square feet of common and private open space.

Access and Circulation

Vehicular access to Planning Areas 1 and 2 would be provided by five driveways that would be developed pursuant to the City of Covina design standards. The driveways include one driveway on W. San Bernardino Road, three driveways on N. Rimsdale Avenue, and one driveway on W. Badillo Street, as described below and shown on Figure 3-8.

- **San Bernardino Road Driveway:** This new driveway would provide access to the proposed residential units and would be located on the south side of San Bernardino Road. The driveway would provide full access (i.e., right-turn and left-turn ingress and egress turning movements).
- **Rimsdale Avenue Driveways to Commercial/Office Use:** The Project includes development of two driveways along the west side of Rimsdale Avenue that would provide access to the proposed commercial/office uses within the Covina Bowl building. The northerly driveway would be limited to left- and right-turn ingress turning movements and the southerly driveway would be limited to left-

and right-turn egress turning movements only; to provide a one-way directional flow of circulation through the commercial/office area parking lot.

- **Rimsdale Avenue Driveways to Residences:** The Project includes development of a driveway along the west side of Rimsdale Avenue that would provide access to the garages and guest parking area for the residential units. This driveway would provide full access (i.e., right-turn and left-turn ingress and egress turning movements).
- **Badillo Street Driveway:** The Badillo Street driveway would provide access to the residential area drive aisles. Due to the existing raised median island on Badillo Street along the Project site frontage, only right-turn ingress and right-turn egress turning movements only would occur at this driveway.

In addition, the Project proposes an enlargement of the right-of-way N. Rimsdale Avenue along the easterly property frontage (westerly portion of the right-of-way) to provide for the addition of angled on-street parking spaces.

The Project also includes pedestrian paths to provide for non-vehicular onsite circulation for connection to existing sidewalks and bike lanes adjacent to the proposed Project.

Landscaping

The Project would provide new ornamental landscaping throughout the proposed development area that would include a variety of trees, shrubs, and ground covers. Proposed landscaping would be concentrated within common open space areas located along the new walkways and parking areas. New plant species would be drought-tolerant, non-invasive, and compliant with the City of Covina's landscaping requirements. Likewise, the new irrigation installed onsite would meet the City's requirements for water efficiency (Covina Municipal Code Section 17.82.060; Landscape water use standards).

The Project would also include the following landscape elements:

- Lighted lawn bowling amenity
- Cantilevered overhead trellis inspired by the folded canopy walkway
- Patio cover inspired by concourse entry canopy
- Paseo entry features inspired by pyramid
- Reuse of existing Bouquet Canyon Rock
- Reuse of existing accents boulders throughout
- Reuse of path lights from existing site lights
- Bowling ball inspired mosaic sphere at entry
- Period appropriate vegetation (new and existing preservation)

Lighting

The proposed Project would install new exterior lighting onsite for security, to accent the landscaping, and to light signage, walkways, and parking areas. The new lighting would be focused on the site, shield off-site areas, and be in compliance with lighting regulations in Municipal Code, Section 17.28.430.

Infrastructure

The proposed development would construct new private streets, curb, gutter, sidewalk, and storm drain improvements, wet and dry utilities, and related infrastructure improvements. The new development would connect to the existing water, sewer, and drainage infrastructure in the W. Badillo Street and N. Rimsdale Avenue right-of-ways.

Drainage Infrastructure: As part of development of the Project, a new onsite stormwater drainage system would be installed within Planning Areas 1 and 2 to convey runoff to the south to a subsurface detention

basin that would then flow to a drywell located near W. Badillo Street. After treatment through the drywell, flows that have not infiltrated into site soils would be conveyed to an existing storm drain in W. Badillo Street.

Water Infrastructure: The proposed development would install new 8-inch water lines within Planning Areas 1 and 2 that would connect to the existing 8-inch water pipeline in N. Rimsdale Avenue. The new onsite water system would be compliant with the California Plumbing Code (Title 24) for efficient use of water.

Wastewater Infrastructure: The proposed development would install new 8-inch sewer lines within Planning Areas 1 and 2 that would connect to the existing 8-inch sewer pipeline in N. Rimsdale Avenue.

3.5.3 CONSTRUCTION ACTIVITIES

Construction activities would include the following: (1) demolition of portions of the existing building (described previously), pavement, removal of infrastructure and landscaping; (2) grading and excavation; (3) construction of drainage, utilities, and subgrade infrastructure; (4) building construction; and (5) paving and application of architectural coatings. As detailed in the Geotechnical Report prepared for the proposed Project. Excavation would remove the loose alluvium that currently underlies the site the upper 5 to 6 feet of soils on the northern portion of the site; and the 10 to 12 feet of loose alluvium on the southern portion of the site. All loose alluvium would be excavated and replaced as compacted fill, and all new building pads would be underlain by a minimum of 5-feet of compacted fill.

Construction activities would be limited to the hours between 7:00 am to 8:00 pm, Monday through Saturday, excluding federal holidays, which would be consistent with the City's Noise Ordinance (Municipal Code Section 9.40.110(A)). Construction of the proposed development in Planning Areas 1 and 2 would occur over 15 months. It is anticipated that a maximum of 56 construction workers would be onsite at one time, which would occur during the building construction phase. Table 3-6 shows the anticipated construction schedule.

Table 3-6: Construction Schedule

Phase Name	Work Days
Demolition	20
Site Preparation	10
Grading	20
Building Construction	230
Paving	20
Architectural Coating	20

3.6 PROPOSED LAND USE AND ZONING DESIGNATIONS

General Plan Amendment

A General Plan Amendment (GPA) is proposed to change the site's land use designations from General Commercial and High Density Residential to Specific Plan (SP).

Zoning Code Amendment

The Specific Plan area is currently zoned Regional or Community Shopping Center (C-3A), Multiple Family (RD), and Administrative and Professional Office (C-P). The proposed Specific Plan would change the zoning of the site to Specific Plan and maintain the same base zoning uses. Planning Area 1 would be designated as Covina Bowl Specific Plan (CBSP) Commercial/Office; Planning Area 2 would be designated as CBSP Residential (RD); and Planning Areas 3 and 4 would be designated as CBSP Mixed Use.

Vesting Tentative Tract Map

Implementation of a Vesting Tentative Tract Map (shown previously in Figure 3-9) is proposed concurrently with the GPA, Specific Plan, Zoning Code Amendment, and Major Site Plan Review. The Vesting Tentative Tract Map would be required to merge the four existing parcels into one parcel within the Specific Plan.

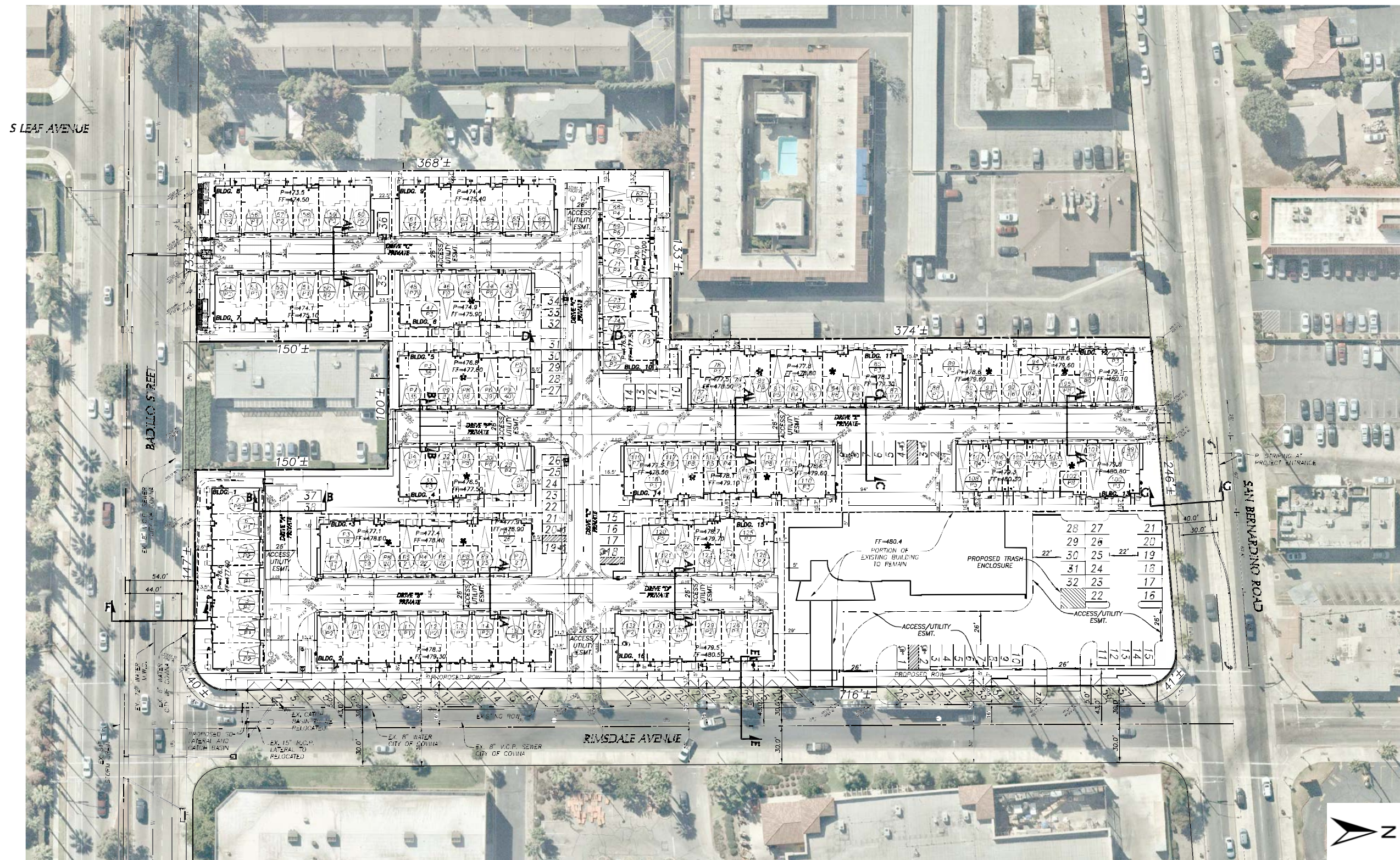
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Project Planning Areas



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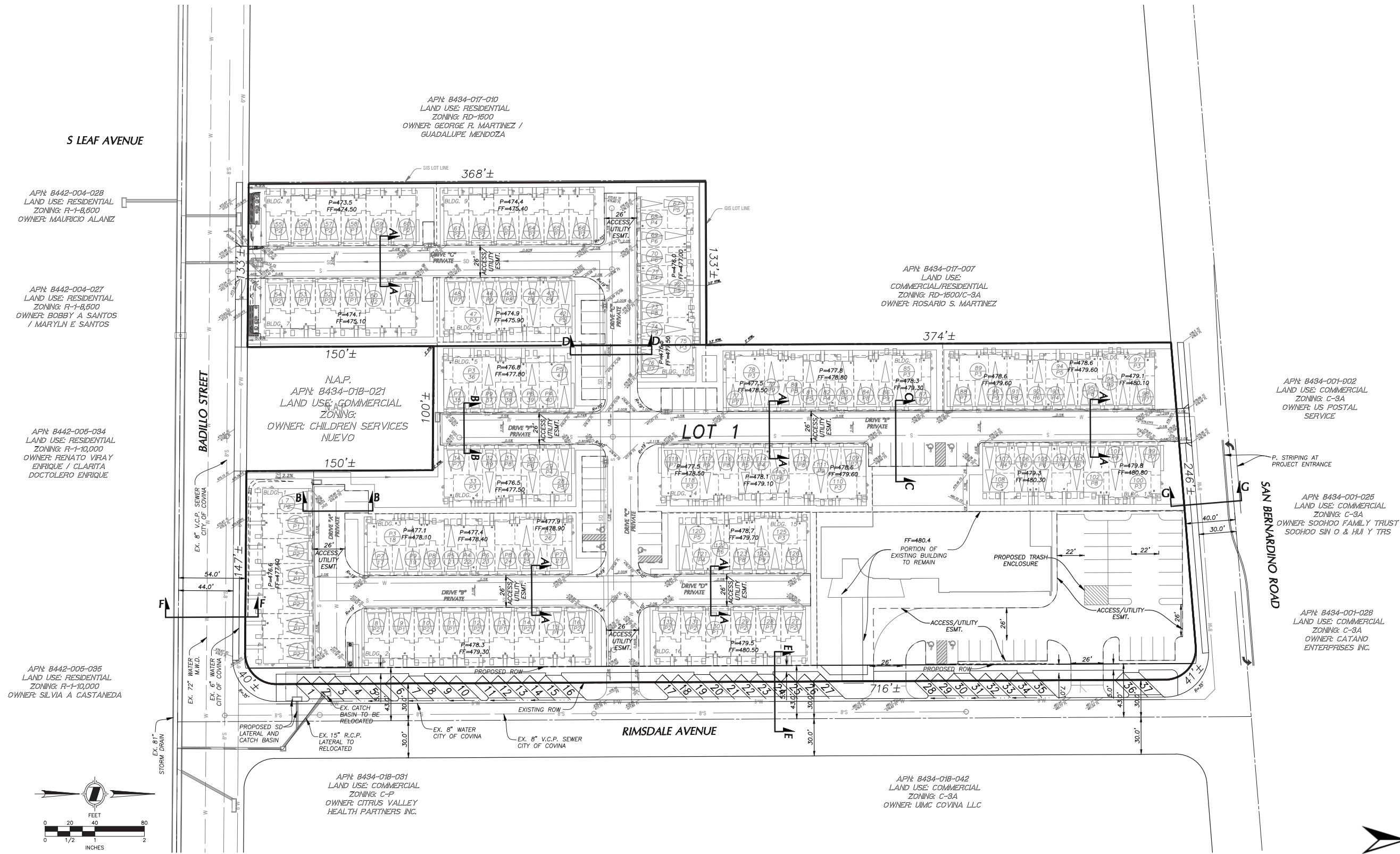
Conceptual Site Plan



Source: Husaker & Associates

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Tentative Tract Map



Source: Husaker & Associates

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Building Elevations (A)



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Building Elevations (B)



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3.7 EXISTING PLANS, PROGRAMS, OR POLICIES AND PROJECT DESIGN FEATURES

Throughout the impact analysis in this EIR, reference is made to Existing Plans, Programs, or Policies (PPPs) that are applied to all development on the basis of federal, state, or local law, which effectively reduce environmental impacts. Where applicable, PPPs are listed to show their effect in reducing potential environmental impacts.

3.8 GOVERNING DOCUMENTS AND INTENDED USES OF THE EIR

Development and operation of the Covina Bowl Mixed-Use Specific Plan Project will be governed by the City of Covina General Plan as amended, which establishes policies governing land use, circulation, housing, noise, and safety throughout the City.

This EIR is intended to serve as the primary environmental document for all actions associated with the proposed Specific Plan Project, including all discretionary approvals requested or required to implement the Specific Plan. In addition, this EIR is the primary reference document in the formulation and implementation of a mitigation monitoring program for the proposed Specific Plan.

This EIR examines the potential environmental impacts of the proposed Specific Plan Project and will be considered by the City in adopting and implementing the Specific Plan. The function of the EIR is to enable the City of Covina to evaluate the environmental impacts of the proposed Specific Plan and make informed decisions with respect to the requested entitlements.

3.9 DISCRETIONARY APPROVALS AND PERMITS

In accordance with Sections 15050 and 15367 of the State CEQA Guidelines, the City is the designated Lead Agency for the proposed Project and has principal authority and jurisdiction for CEQA actions and Project approval.

The discretionary actions to be considered by the City as part of the proposed Project include:

- Specific Plan Project
 - Covina Bowl Specific Plan Adoption
 - General Plan Amendment
 - Zone Change
- Development Project (Planning Area 1 & 2)
 - Major Site Plan Review
 - Vesting Tentative Tract Map
 - Annexation into the City's Community Facilities District (CFD)

In addition, the proposed Development Project within Planning Areas 1 and 2 will require ministerial approvals that include, but are not limited to, the following:

- Issuance of grading permits
- Issuance of building permits
- ROW encroachment permits

Separate discretionary review and approval would be required for development of Planning Areas 3 and 4, and additional environmental review may be necessary as part of the discretionary review process.

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4. Environmental Setting

The purpose of this section is to provide a “description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the Notice of Preparation (NOP) is published, from both a local and a regional perspective” pursuant to CEQA Guidelines Section 15125(a). In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

4.1 PROJECT LOCATION

The proposed 7.5-acre Covina Bowl Specific Plan (“Project” or “proposed Project”) is located within the western portion of the City of Covina. As depicted in Section 3.0, Figure 3-1, *Regional Location*, the City of Covina is in the San Gabriel Valley region of Los Angeles County, approximately 22 miles east of downtown Los Angeles, 35 miles west of downtown San Bernardino, and 10 miles northeast of Orange County.

As depicted in Section 3.0 on Figure 3-2, the Project site is bounded by N. Rimsdale Avenue to the east, W. San Bernardino Road to the north, and W. Badillo Street to the south. Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately 0.20 miles to the east. Local access is provided by W. San Bernardino Road, W. Badillo Street, and N. Rimsdale Avenue.

The Project site is within the southwest quarter of Section 15, Township 1 South, Range 10 West, San Bernardino Base and Meridian as depicted on the U.S. Geological Survey (USGS) Baldwin Park 7.5- minute quadrangle.

4.2 PROJECT SITE DESCRIPTION

The Project site consists of 5 parcels that are developed with approximately 110,542 square feet of commercial, office, church, and residential uses. Existing on-site and surrounding land uses are shown in Section 3.0 on Figure 3-3, *Existing On-site Land Uses* and listed below by parcel.

- 1118 W. San Bernardino Road (APN 8434-017-007) is 1.71 acres and developed with a restaurant and 31 multi-family residential units that total a building square footage of 32,589.
- 1060 W. San Bernardino Road (APN 8434-018-020) is 4.28 acres and developed with the vacant Covina Bowl building and associated parking.
- 1103 W. Badillo Street (APN 8434-017-008) is 0.56 acres and developed with a 2,994 square foot vacant daycare center.
- 1111 W. Badillo Street (APN 8434-017-009) is 0.58 acres and developed with a 1,646 square foot church.
- 1085 W. Badillo Street (APN 8434-018-021) is 0.35 acres and developed with a 4,175 square foot office building.

The existing development within the Project site the single-story vacant Covina Bowl building (further discussed below), a vacant daycare, an office building, and a church, a two-story 31-unit residential apartment complex (Continental Garden Apartments), and a detached single-story restaurant (Mar Y Tierra).

Building exteriors are distinguished by detailing around the entrances that include steel framed or wood framed doorways. Chain-link fencing currently surrounds the vacant daycare that is located on the

southwestern portion of the Project site, as well as an existing concrete block wall that is located in the central portion of the Project site, which separates the parking areas for the vacant Covina Bowl building from adjacent land uses to the west. Lighting is present in parking areas and on the exterior of the buildings. On-site ornamental landscaping includes lawns, shrubs, and trees internal along the site boundaries.

General Plan Designations. As depicted in Section 3.0 on Figure 3-5, *Existing General Plan Land Use Designations*, a large portion (5.83 acres or 77%) of the Project site is designated for General Commercial Land Uses, which includes retail, office, and services, and has a maximum Floor Area Ratio (FAR) of 1.5. The remainder of the Project site (1.71 acres or 23%) is designated for High Density Residential uses that has a maximum non-residential FAR of 0.5 and a residential density of 14.1 to 22 dwelling units per acre.

Zoning Districts. As shown in Section 3.0 on Figure 3-6, *Existing Zoning*, 73 percent (or 5.48 acres) of the Project site is zoned Regional or Community Shopping Center (C-3A), 23 percent (or 1.71 acres) is zoned Multiple Family (RD-1500), and 4 percent (0.35 acre) is zoned Administrative and Professional Office (C-P).

Surrounding Areas. The Project site is located in a portion of City of Covina that is developed and urban, with commercial and retail uses to the north; multi-family and retail uses to the west; office and retail uses to the south; and single-family residential uses to the south, as depicted in Figure 3-4, *Surrounding Land Uses*. The Project site is bound by W. San Bernardino Road, which is a 4-lane secondary arterial roadway to the north; N. Rimsdale Avenue, a 2-lane collector roadway to the south; and W. Badillo Street, a 4-lane primary arterial roadway to the south. The existing street parkways include sidewalks, with some portions containing trees and other landscaping.

4.3 AESTHETICS

Visual Character of Project Site: The visual character of the Project site is urban and developed. The Project site is developed with several structures that include a vacant bowling center and commercial strip building, vacant daycare building, office building, church, restaurant, and 31-unit multi-family residential building.

The existing structures include a total of approximately 77,953 square feet of non-residential uses and approximately 32,589 square feet of residential and retail uses, which include parking areas and vehicle circulation drives.

The existing vacant bowling center, vacant daycare, office, church, and restaurant are one-story in height, and the existing multi-family residential building is two-stories in height. The Project site includes ornamental trees scattered throughout the site, and street trees along W. Badillo Street, W. San Bernardino Road, and N. Rimsdale Avenue.

The exteriors of the buildings are distinguished by detailing around the entrances that include steel framed or wood framed doorways. The vacant daycare, office, and restaurant have a typical boxy modern office/retail structure appearance with distinguishable signage. The existing restaurant contains a large three-story sign with multiple smaller signs throughout and is a prominent feature to motorists along W. San Bernardino Road.

- **The Covina Bowl.** This building has character-defining features of the Googie style architecture, including: a prominent pyramid building entry, the folded plate entrance canopy, and the 60-foot high reverse triangular neon sign with a letter “C”; metal-framed fenestration, aluminum-framed windows, triangular façade baffles, and Bouquet Canyon Rock walls, and angled exposed structure awnings. Other existing architecture includes a Mayan-themed concrete block curved wall located beneath the pyramid entry. In addition, the Covina Bowl building has a flat roof, steel framing, and consists of tilt-up precast concrete walls. The building is surrounded on three sides with asphalt

surface parking and low-raised planters with subtropical plantings, large accent boulders, and the original tiki lights.

- **Vacant Daycare Building.** Chain-link fencing currently surrounds the vacant 2,994 square foot one-story building that is located on the southwestern portion of the Project site. The building is generally gray and rectangular with ceramic tile across along the front. Fenestration includes aluminum-framed, sliding windows. The front setback of the parcel provides a parking area for the daycare, and approximately eight mature citrus trees are located to the rear of the building.
- **Office Building.** This 4,175 square-foot one-story office building faces south adjacent to W. Badillo Street. The rectangular building is non-descript and consists of stucco and painted brick veneer with a raised planter with ornamental landscaping is adjacent to the street. The building is urban in character and is adjacent to an onsite parking lot.
- **Church.** The existing church building is a wood-framed, square building that is capped by a low-pitched, cross-gabled roof covered with composition shingles. The fenestration is a mix of steel-framed casement façade windows with diamond-paned, stained glass, two jalousie windows with stained glass near the façade on the east side, and original wood-framed double-hung windows. A parking lot for the church is located behind the building, with driveway access from W. Badillo Street. A lawn is located in the front of the building in the street setback, and several mature citrus trees are located on the west side and in the rear of the church parcel.
- **Restaurant.** The existing restaurant building is a one-story building with several rooftop structures that are visible from the street level consisting of HVAC and air conditioning equipment. Closer to W. San Bernardino Avenue are three prominent identification signs mounted atop poles that are much higher than the adjacent buildings' roof. The frontage has an area of sparse ground cover vegetation next to a concrete sidewalk with vehicle parking areas adjacent to the building.
- **Multi-family Residential Building.** The 31-unit multi-family residential building is two stories in height and is just visible in the background, beyond the existing restaurant building. There is a small identification sign mounted atop poles at the entrance driveway to the community along the W. San Bernardino Avenue frontage. There is an existing block wall, with a small identification sign atop, and a wrought-iron gate at the entrance to the community beyond the parking lot adjacent to the existing restaurant building.

Visual Character of Surrounding Area: The existing visual character of the area surrounding the Project site is urban. There is no consistent architectural or visual theme within the surrounding area and significant visual resources are limited. The parcel across N. Rimsdale Avenue is developed with a Costco store and associated parking areas. Areas across W. San Bernardino Road, which is a 4-lane secondary arterial roadway, from the Project site is commercial in nature. Areas across from the site, on the northeast corner of W. San Bernardino Road and N. Rimsdale Avenue, are developed with single-story rectangular urban buildings that are used for commercial and retail uses. In addition, the area directly across W. Badillo Street from the Project site is developed with one-story and two-story single-family residences with associated driveways, fencing, and landscaping. The foreground views of the areas are dominated by mostly chain-link fencing adjacent to the W. Badillo Street right-of-way, street trees, and relatively dense landscaping.

Nighttime Lighting. The Project site is located within an urbanized area that generates the majority of light from vehicular traffic on local streets, street lighting, signage, interior lighting passing through windows, and exterior security lighting. The existing industrial uses on the Project site do not generate substantial light. Light generated by vehicular traffic is from W. San Bernardino Road, W. Badillo Street, and N. Rimsdale Avenue, which border the Project site. In addition, both roadways have existing street lighting.

4.4 AIR QUALITY

The Project site is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

SCAQMD maintains monitoring stations that monitor air quality and compliance with associated ambient standards. In 2018, the federal and state ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone, PM₁₀, and PM_{2.5} at most monitoring locations.

4.4 CULTURAL RESOURCES

Historic. Development in the Project area began in the late-19th century with the establishment of the citrus industry in Covina. The Project area consisted of a citrus grove until the late-1950s and early-1960s when commercial and residential uses were developed. Two single-family residences, now the Unity Church of the Foothills and the vacant daycare center (in Planning Area 2), were the first to be constructed within the Project site in late-1953. The Covina Bowl building was developed in 1955 (in Planning Area 1). Then the small office (in Planning Area 3) was added on in 1963.

Covina Bowl Building. The Cultural Resources Survey describes that the Covina Bowl building, which opened in 1956, contributed to the post-WWII suburbanization of Covina that was blanketed with citrus groves. Although modifications to the site have occurred since 1956, the Covina Bowl building still exhibits character-defining features of the Googie style architecture (shown in Figure 5.3-2), including: the prominent pyramid building entry, the folded plate entrance canopy, and the 60-foot high reverse triangular neon sign with a letter "C"; metal-framed fenestration, aluminum-framed windows, triangular façade baffles, and Bouquet Canyon Rock walls, and angled exposed structure awnings. Other existing architecture includes a Mayan-themed concrete block curved wall located beneath the pyramid entry. In addition, the Covina Bowl building has a flat roof, steel framing, and consists of tilt-up precast concrete walls. The building is surrounded on

three sides with asphalt surface parking and low-raised planters with subtropical plantings, large accent boulders, and the original tiki lights.

Interior features include a north-south green terrazzo concourse, original diner counter and service area with mid-century appliances such as milkshake machine and pie safe, full-height entry lobby, Bouquet Canyon Rock walls, billiards room, nursery, beauty shop, and spacious meeting, banquet, and entertainment areas (e.g. Pyramid Room and Egyptian Room).

The Covina Bowl building was designed by the architectural firm Powers, Daly and DeRosa, who pioneered the bowling center architecture with the design of the Covina Bowl. The Covina Bowl became a prototype for dozens of bowling centers designed by Powers, Daly and DeRosa. For 60 years, the Covina Bowl was a well-used recreation center, community gathering place, meeting spot, and special event location for residents, service clubs, and other local groups.

The Covina Bowl building was modified several times, including: a 21,800-square-foot south addition (1963); enlargement of the cocktail lounge (1962 & 1965), which likely included development of the curved Mayan concrete wall at the entry; the replacement of the “Covina” script with the existing “C” letter in the 60-foot high reverse triangular sign (1970); and addition to the north end of the building (1974).

Interior modifications include: modernization of restrooms (date unknown), remodel of diner seating and back counter service area (late-1970s); replacement of bowling seating and scoring tables and the covering of concourse bulkhead (early-2000s), and removal of all 50 bowling lanes (2017).

The Cultural Resources Survey describes that modifications to the building since its original construction do not compromise the overall integrity of the property, and the Covina Bowl was formally determined eligible for listing in the National Register in 2016. The Cultural Resources Survey determined that the existing Covina Bowl building continues to meet the threshold for eligibility for listing in the National Register and California Register because it exemplifies the bowling center architectural type as pioneered by master architectural firm, Powers, Daly, and DeRosa and expressed in the Googie style of roadside commercial architecture.

In addition, the Covina Bowl building is eligible for local designation as a City Landmark under Chapter 17.81 of the City’s Municipal Code, as it reflects special elements of the City’s cultural and social history (Criterion 1), represents the work of notable architectural firm, Powers, Daly, and DeRosa (Criterion 3), and embodies distinctive characteristics of the bowling center architectural type and Googie style roadside architecture (Criterion 4) (CUL 2020).

Daycare Building. The existing daycare building (shown in Figure 5.3-6) was originally constructed as a single-family residence in 1953 and was used as a daycare. The Cultural Resources Survey determined that the integrity of the building has been thoroughly compromised by extensive alterations and it is not a historic resource (CUL 2020).

Unity Church of the Foothills. The existing church (shown in Figure 5.3-6) was originally constructed as a single-family residence in 1953 and was in use as a church from at least 1962. The Cultural Resources Survey determined that the building lacks significance and integrity because it has been compromised by extensive alterations, and it is not a historic resource (CUL 2020).

Office. The existing office building (shown in Figure 5.3-6) was originally developed in 1963, but underwent extensive remodels in 1980 and 1995 that included rear additions, changes in fenestration patterns and features, restuccoing, addition and embellishment of brick veneer, modification of side elevation walls, and addition of the east patio. The Cultural Resources Survey determined that the building lacks significance, and the alterations have compromised its original integrity. Therefore, the building is not a historic resource (CUL 2020).

Archaeologic. The records searches conducted for the proposed Project identified that one linear archaeological resource (P19-187085) is located within one-half mile of the Project site. This resource is the potential location or vicinity of the Mojave Road, which according to historical documentation, existed in between Fort Drum in Wilmington, California, and Fort Mojave, Arizona. This resource currently is the location of the historic and modern Southern Pacific Railroad (SPRR) approximately 1,000 feet north of the Project site. However, no archaeological remains of the Mojave Road were discovered during the survey completed for the Cultural Resources Survey (CUL 2020).

4.6 ENERGY

Electricity. The Southern California Edison Company (SCE) is the electrical purveyor in the City of Covina. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2018 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the state to cut greenhouse gas emissions 40 percent below 1990 levels by 2030 in order to help address global climate change. It describes that in 2018 Approximately 35% of power that SCE delivered to customers in 2018 came from renewable sources (SCE 2018).

The Project site is currently served by the electricity distribution systems that exists along the roadways adjacent to the Project site.

Natural Gas. The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City of Covina and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of 0.5 percent from 2018 to 2035 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to advanced metering infrastructure (CGEU 2018). The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada (CGEU 2018). SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2035 in its 2018 report (CGEU 2018).

The Project site is currently served by the natural gas distribution system that exists within the roadways that are adjacent to the site.

4.7 GEOLOGY AND SOILS

Regional Setting. The Project site is located within the Transverse Ranges Geomorphic province of California. The Transverse Ranges consist of generally east-west trending mountains and valleys, which are in contrast to the north-northwest regional trend elsewhere in the state. The structure of the Transverse Ranges is controlled by the effects of north-south compressive deformation (crustal shortening), which is attributed to convergence between the big bend of the San Andreas fault north of the San Gabriel Mountains and the motion of the Pacific Plate. The valleys and mountains of the Transverse Ranges are typically bounded by a series of east west trending, generally north dipping reverse faults with left-lateral oblique movement.

The Transverse Ranges are characterized by a very thick, nearly continuous sequence of Upper Cretaceous through Quaternary sedimentary rocks that has been deformed into a series of east-west trending folds

associated with thrust and reverse faults. This deformation has created intrabasin highlands and intervening lowlands (GEO 2017).

Faults and Ground Shaking. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the A-P Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate “Earthquake Fault Zones” along with faults that are “sufficiently active” and “well-defined.” The boundary of an “Earthquake Fault Zone” is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone; therefore, there are no known active faults within or near the Project. According to the City’s Safety Element of the General Plan, there are no major earthquake faults in the City. However, the City has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. There are some faults in close enough proximity to the Project to cause moderate to intense ground shaking during the lifetime of the proposed development. (GEO 2017). The two closest faults are: 1) the Indian Hill Fault, which runs through a portion of the northeastern section of the City approximately 1 mile to the east of the Project site; and 2) the Walnut Creek Fault, which traverses southeastern Covina along Walnut Creek approximately 2 miles southeast of the Project site (CDOC 2020).

Soils. The Geotechnical Report describes that the site is underlain by alluvium that consists of interbedded silty very fine to fine sand, fine to medium sand and fine to very coarse sand with gravel/rock. The subsurface exploration revealed that the northern portion of the site is underlain by 5 to 6 feet of loose alluvium. On the southern portion of the site the loose alluvium extends to depths of 10 to 12 feet. The Geotechnical Report states that the alluvium is suitable for replacement as engineered fill, provided that the materials do not contain debris or large rocks (GEO 2017).

Groundwater. No groundwater was encountered in any of the borings drilled on site during preparation of the Geotechnical Report. The groundwater maps from the Seismic Hazard Zone Report for the Baldwin Park 7.5 Minute Quadrangle published by the Department of Conservation Division of Mines and Geology indicate that the historic high groundwater more than 150 feet below existing ground surface (GEO 2017).

Liquefaction, Settlement, Subsidence, and Landslides. The Geotechnical Report describes that on-site static settlement is expected to be less than 1.0-inch, while differential settlement is expected to be less than 0.5-inch. (GEO 2017). The Geotechnical Report describes that no significant slopes are present on or near the site; thus, the site is not located in an area defined by the State for earthquake-induced landslides, and the potential for earthquake-induced landsliding is considered low (GEO 2017). In addition, the Project area is in a flat developed urban area that does not contain large slopes.

Paleontological Resources. The Cultural Resource Survey describes that the Project area is mapped as being underlain by surficial sediments of alluvial gravel, sand, and silt (Qa). Soil survey data indicates that the Project area is composed of urban land composed of the Palmview-Tujunga Complex. As described in the Cultural Resource Survey, a resource records search was conducted at the Natural History Museum of Los Angeles County, which identified that the closest previously discovered fossil locality is 0.5 mile away from the Project site and recorded at 115–120 feet below ground surface. Thus, the Cultural Resource Survey determined that the Project area has a low level of sensitivity for paleontological resources (CUL 2020).

4.8 GREENHOUSE GAS

Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

Statewide GHG emissions have generally decreased over the last decade, with 2016 levels (429 million MTCO₂e) approximately 11 percent less than 2005 levels (486 million MTCO₂e) and below the State's 2020 reduction target of 431 million MTCO₂e. The transportation sector (165 million MTCO₂e) accounted for more than one-third (approximately 39.4%) of the State's total GHG emissions inventory (429 million MTCO₂e) in 2016 (CARB 2018).

Existing Specific Plan Area Conditions. The Project site is developed with approximately 110,542 square feet of various commercial and residential uses, associated parking lots, and landscaping. The sources of GHG emissions related to existing uses onsite includes: natural gas used for heating and hot water, electricity usage, vehicle trips, use of landscaping equipment, use of consumer cleaning products, water demand, wastewater generation, and solid waste generation.

4.9 HAZARDS AND HAZARDOUS MATERIALS

The existing buildings within Planning Areas 1 and 2, which are the areas that Project related construction would occur were developed in the 1950s. The buildings have been occupied by church, pre-school, bowling alley, restaurant, salon, office, and retail uses that do not involve use of acute hazardous materials. In addition, a review of historical records indicates that a former railroad line was adjacent to the southern boundary of the property until circa 1950, and an orchard was onsite between approximately 1928 and circa 1960 (Phase II 2019).

Previous Railroad Line and Agricultural Use. The Limited Phase II ESA (Phase II 2019) describes that a railroad line previously existed along the southern boundary of the site until circa 1950. The Limited Phase II ESA describes that vegetation inhibitor chemicals (i.e., herbicides) were applied along railroad lines, and often contained elevated levels of metals such as lead and arsenic. Therefore, a potential presence of elevated metals along the previous railroad alignment was identified. The Limited Phase II ESA also describes that the site was used as an orchard from at least 1928 through circa 1960. As a result, potential pesticides and/or herbicides may have been used on the site.

Therefore, the Limited Phase II ESA conducted soils testing and compared the laboratory test results to the US Environmental Protection Agency USEPA and CAL-EPA /Department of Toxic Substances Control (DTSC) residential screening levels. The test results showed that TPH-diesel, TPH-motor oil, and organochlorine pesticide concentrations were non-detectable; concentration of lead were below the screening level; the maximum concentration of arsenic were within the expected background concentration for arsenic in Southern California; and the remaining metal concentrations were below the corresponding screening levels. Overall, the testing results show that the site soils meet residential development standards (Phase II 2019).

Asbestos. Asbestos and asbestos-containing materials (ACMs) are considered both a hazardous air pollutant and a human health hazard. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when ACMs are disturbed during such activities as demolition and renovation. The buildings within the Project site were constructed before 1981 when asbestos containing materials were commonly used and the Phase I identified that asbestos containing material are possible on the site (Phase I 2019).

Lead. The chief concern related to lead-based paint is its cumulative effect on body systems, primarily when paint chips containing lead are ingested. Lead dust is of special concern because the smaller particles are more easily absorbed by the body. Common methods of paint removal, such as sanding, scraping, and burning, create excessive amounts of dust. Lead dust is especially hazardous to young children because they play on the floor and engage in a great deal of hand-to-mouth activity, increasing their potential for exposure. Due to the age of the onsite buildings, it is possible that lead-based paint and other lead containing materials are present in the buildings on the Project site (Phase I 2019).

4.10 HYDROLOGY AND WATER QUALITY

Watershed. The Project site is in the San Gabriel River Watershed. The San Gabriel River Watershed is located in the eastern portion of Los Angeles County. It is bound by the San Gabriel Mountains to the north, most of San Bernardino/Orange County to the east, the division of the Los Angeles River from the San Gabriel River to the west, and the Pacific Ocean to the south. The watershed covers approximately 640 square miles and there are approximately 35 cities within the watershed. The watershed drains into the San Gabriel River from the San Gabriel Mountains flowing 58 miles south until its confluence with the Pacific Ocean. Major tributaries to the San Gabriel River include Walnut Creek, San Jose Creek, Coyote Creek, and numerous storm drains entering from the 19 cities that the San Gabriel River passes through¹.

Water Quality, Receiving Water Impairments. Section 303(d) of the federal CWA requires states to identify water bodies that are “impaired,” or those that do not meet water quality standards and are not supporting their beneficial uses. Total Maximum Daily Loads (TMDLs) are then designed to serve as pollution control plans for these specific pollutants and water bodies.

As described further below, runoff from the Project site and surrounding area is conveyed to Walnut Creek Channel, prior to discharging to Reach 3, 2 and 1 of the San Gabriel River. Impairments to these receiving waters are listed in Table 4-1.

Table 4-1: Receiving Waters and 303(d) Listing Status

Receiving Water	303(d)	TMDL Status
Walnut Creek	Benthic Community Effects Indicator Bacteria, pH	TMDL Required
San Gabriel River Reach 3	Indicator Bacteria	Approved TMDL
San Gabriel River Reach 2	Cyanide, Temperature	TMDL Required
San Gabriel River Reach 1	Lead pH, Temperature	Approved TMDL TMDL Required
San Gabriel River Estuary	Dioxin, Nickel Oxygen, Dissolved Copper, Indicator Bacteria	TMDL Required Approved TMDL

Source: Hunsaker 2019

¹ <https://dpw.lacounty.gov/wmd/watershed/sg/>

Drainage Conditions. The Planning Areas 1 and 2 (the development portion of the Specific Plan area) are currently 94 percent impervious (Hunsaker 2019a). Stormwater and surface water on the site generally flow from the northeast to the southwest. The runoff from the site discharges into Rimsdale Avenue and Badillo Street. There are catch basins and storm drain systems at the northwest of the Rimsdale Avenue and Badillo Street intersection and at the southwest Project site boundary along Badillo Street. The catch basin flows discharge into the existing 81-inch storm drain in Badillo Street (Hunsaker 2019b). Runoff is then conveyed westerly approximately 2.25 miles to Big Dalton Wash, which is an open, concrete lined, rectangular-channel. Runoff is then conveyed southeasterly approximately 2 miles to the confluence with the Walnut Creek Channel, prior to discharging to Reach 3, 2 and 1 of the San Gabriel River, and ultimately outflowing to the Pacific Ocean.

Flood Zone. According to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) (06037C1700F), the Project site is primarily located in “Zone X”, which is an area located outside of the 100-year and 500-year flood plains.

4.11 LAND USE AND PLANNING

Project Site. The 7.5-acre Specific Plan area (or Project site/Project area) includes four Planning Areas. The existing buildings within the Project site total 110,542 square feet of residential and non-residential uses, as listed in Table 4-2 and described below.

Table 4-2: Planning Areas

Address	APN	Acres	Existing Land Use	Proposed Land Use
Planning Area 1				
1060 W. San Bernardino	8434-018-020	0.96	Vacant Bowling (Covina Bowl)	Office/Commercial
Planning Area 2				
1060 W. San Bernardino	8434-018-020	4.54	Vacant Bowling (former Covina Bowl)	Residential
1103 W. Badillo Street	8434-017-008		Vacant Daycare	
1111 W. Badillo Street	8434-017-009		Church	
Planning Area 3				
1085 W. Badillo Street	8434-018-021	0.35	Office	Office/Commercial/Residential
Planning Area 4				
1118 W. San Bernardino	8434-017-007	1.71	Restaurant, Residential	Restaurant/Residential

The Covina Bowl and daycare buildings are currently vacant; however, the other buildings onsite are being utilized by various short-term leasers that includes: 32,589 square feet of restaurant use and the 31 unit multi-family residential complex within Planning Area 4; 1,646 square foot church within Planning Area 2; and 4,175 square feet of office within Planning Area 3. Approximately, 72,132 square feet of building area (approximately 65 percent) is currently vacant.

The Project site contains limited vegetation with ornamental trees scattered throughout the site. Street trees are located along W. San Bernardino Road, N. Rimsdale Avenue, and W. Badillo Street.

General Plan Land Use: The existing land use designations within the Project site includes a mix of commercial and residential land uses. As shown in Table 4-3, *General Plan Land Use Designations*, the General Commercial land use designation (with a maximum FAR of 1.5) applies to 77 percent of the Project site and the High Density Residential land use designation (14.1 to 22 dwelling units per acre) applies to 23 percent of the Project site.

Table 4-3: Existing General Plan Land Use Designations

Land Use	Acres	Percentage of the Specific Plan area
General Commercial	5.83	77%
High Density Residential	1.71	23%
Total	7.54	100%

Zoning. As shown in Table 4-4, *Existing Zoning Districts*, 73 percent of the Project site is zoned Regional or Community Shopping Center (C-3A), 23 percent is zoned Multiple Family (RD), and 4 percent Administrative and Professional Office (C-P).

Table 4-4: Existing Zoning Districts

Land Use	Acres	Percentage of the Specific Plan area
Regional or Community Shopping Center (C-3A)	5.48	73%
Multiple Family (RD)	1.71	23%
Administrative and Professional Office (C-P)	0.35	4%
Total	7.54	100%

Surrounding Land Uses. The Project site is located in a portion of City of Covina that is urban and developed. Surrounding land uses include:

- **North:** W. San Bernardino Avenue (a 4-lane secondary arterial roadway) bounds the site to the north, followed by commercial, retail uses, and associated parking areas.
- **South:** W. Badillo Street (a 2-lane collector roadway to the south) bounds the site to the south, followed by single-family residential uses, associated structures, and driveways.
- **East:** N. Rimsdale Avenue (a 4-lane primary arterial roadway) bounds the site to the east, followed by office and retail uses, and associated parking areas.
- **West:** The Project site is bound to the west by multi-family residential and retail uses, including associated structures and parking areas.

4.12 NOISE

Existing Noise Levels. To assess the existing noise level environment, 24-hour noise level measurements were taken at 5 locations. A description of these locations and the existing noise levels are provided below and listed in Table 4-5.

- Location L1 represents the noise levels north of the Project site on W. San Bernardino Road near existing single-family home at 1123 W. San Bernardino Road. The noise level measurements collected show an overall 24-hour exterior noise level of 71.3 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 68.6 dBA L_{eq} with an average nighttime noise level of 63.1 dBA L_{eq} .
- Location L2 represents the noise levels east of the Project site in the parking lot of Home Depot. The noise level measurements collected show an overall 24-hour exterior noise level of 59.2 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 55.0 dBA L_{eq} with an average nighttime noise level of 52.0 dBA L_{eq} .

- Location L3 represents the noise levels south of the Project site on W. Badillo Street near existing single-family residence at 1108 Badillo Street. The noise level measurements collected show an overall 24-hour exterior noise level of 69.1 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 65.2 dBA L_{eq} with an average nighttime noise level of 61.6 dBA L_{eq} .
- Location L4 represents the noise levels by the western boundary of the Project site near the existing single-family residence at 1119 W. Badillo Street. The noise level measurements collected show an overall 24-hour exterior noise level of 60.6 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 59.5 dBA L_{eq} with an average nighttime noise level of 51.7 dBA L_{eq} .
- Location L5 represents the noise levels northwest of the Project site by the Covina Bonita Apartments at 1130 W. San Bernardino Road. The 24-hour CNEL indicates that the overall exterior noise level is 58.0 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 52.4 dBA L_{eq} with an average nighttime noise level of 51.1 dBA L_{eq} .

Table 4-5: Summary of 24-Hour Ambient Noise Level Measurements

Location	Description	Energy Average Noise Level (dBA L_{eq})		CNEL
		Daytime	Nighttime	
L1	Located north of the Project site near existing single-family home at 1123 W. San Bernardino Road.	68.6	63.1	71.3
L2	Located east of the Project site in the parking lot of Home Depot.	55.0	52.0	59.2
L3	Located south of the Project site near an existing single-family residence at 1108 W. Badillo Street.	65.2	61.6	69.1
L4	Located by the western boundary of the Project site near the existing single-family residence at 1119 W. Badillo Street.	59.5	51.7	60.6
L5	Located northwest of the Project site by the Covina Bonita Apartments at 1130 W. San Bernardino Road.	52.4	51.1	58.0

Source: Urban Crossroads, 2020.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

In addition, the Noise Impact Analysis modeled the existing roadway volumes (detailed in the Traffic Impact Study) to identify the existing traffic noise from roadways near the Project site. As shown in Table 4-6, the existing roadway noise near the Project site ranges from 61.0 to 69.8 dBA CNEL.

Table 4-6: Existing Noise Contours

ID	Road	Segment	Receiving Land Use	CNEL at Nearest Receiving Land Use (dBA) ¹	Distance to Contour from Centerline (Feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Lark Ellen Av.	n/o Cypress St.	Sensitive	68.6	RW	69	149
2	Lark Ellen Av.	s/o Cypress St.	Sensitive	68.0	RW	63	136
3	Lark Ellen Av.	s/o San Bernardino Rd.	Sensitive	69.0	RW	74	158
4	Lark Ellen Av.	n/o Puente Av.	Sensitive	69.8	RW	83	180
5	Rimsdale Av.	s/o San Bernardino Rd.	Non-Sensitive	61.0	RW	RW	46
6	Azusa Av.	n/o Cypress St.	Non-Sensitive	68.4	RW	84	181
7	Azusa Av.	n/o San Bernardino Rd.	Non-Sensitive	68.3	RW	83	178
8	Azusa Av.	s/o Badillo St	Sensitive	68.7	RW	88	189
9	Azusa Av.	s/o Puente Av.	Sensitive	69.3	RW	96	208
10	Hollenbeck Av.	n/o San Bernardino Rd.	Sensitive	66.7	RW	52	112
11	Hollenbeck Av.	s/o Badillo St	Sensitive	66.3	RW	49	105
12	San Bernardino Rd.	w/o Lark Ellen Av.	Sensitive	69.1	RW	76	163
13	San Bernardino Rd.	e/o Rimsdale Av.	Non-Sensitive	67.9	RW	62	134
14	San Bernardino Rd.	e/o Hollenbeck Av.	Sensitive	65.0	RW	40	86
15	Badillo St.	w/o Lark Ellen Av.	Sensitive	69.0	RW	93	200
16	Badillo St.	w/o Azusa Av.	Sensitive	68.0	RW	80	172
17	Badillo St.	e/o Armel Dr.	Sensitive	67.8	RW	77	166
18	Puente Av.	w/o Lark Ellen Av.	Sensitive	65.8	RW	57	122
19	Puente Av.	e/o Azusa Av.	Sensitive	66.6	RW	51	109

Source: Urban Crossroads, 2020.

¹ The CNEL is calculated at the boundary of the roadway right-of-way and the property line of the nearest receiving land use.

"RW" = Location of the respective noise contour falls within the right-of-way of the road.

4.13 PUBLIC SERVICES

Fire. The City contracts with the Los Angeles County Fire Department (LACFD) to provide fire protection services and emergency response services. There are three fire stations within the City: Fire Station 152, located at 807 West Cypress Street; Fire Station 153, located at 1577 East Cypress Street; and Fire Station 154, located at 401 North 2nd Avenue.

Table 4-7: Fire Stations within the City of Covina

Fire Station	Location	Distance from Site	Estimated Response Time	Equipment	Staffing
Station 152	807 West Cypress Street	0.9 mile	3 minutes	1 Paramedic Engine	1 Fire Captain, 1 Fire Fighter Specialist, and 1 Fire Fighter
Station 153	1577 East Cypress Street	1.0 mile	3 minutes	1 combination ladder truck/pumper engine	1 fire captain, 1 fire fighter engineer, and 2 fire fighters
Station 154	401 North 2nd Avenue	1.5 miles	5 minutes	1 Paramedic Engine	1 Captain, 1 Fire Fighter Specialist and 1 Fire Fighter/Paramedic and a 2-person paramedic squad, staffed with 2 Fire Fighter/Paramedics.

Source: LACFD 2020

Fire Station 152, which is located approximately 0.9 mile to the north of the Project site, is the first responder to calls for service from the site. Station 152 is staffed daily with a three-person engine company consisting

of one fire captain, one fire fighter engineer, and one fire fighter, and has an estimated response time of 3 minutes to the site. Fire Station 154 is located 1.5 miles to the east of the Project site. Fire Station 154 has a three-person assessment engine staffed with one fire captain, one fire fighter engineer, and one fire fighter paramedic, and a paramedic squad staffed with two fire fighter paramedics and has an estimated response time of 5 minutes to the site. Daily on-duty staffing consists of 5 uniformed employees. Fire Station 154 also has a two-person paramedic squad staffed daily with two fire fighters/paramedics.

Fire Station 153 is located 1.0 mile from the site at 1577 East Cypress Street. However, Fire Station 153 would not be dispatched to the site unless there is a significant incident that would require regional resources (LACFD 2020). Currently, the Los Angeles County Fire Department does not have plans to expand facilities, staff, or equipment at Fire Stations 152, 153, or 154 (LACFD 2020).

Law Enforcement. The Covina Police Department provides police services throughout the City. The Police Department headquarters is located Covina Police Department headquarters, approximately 1.28 miles east of the Project site at 444 N Citrus Avenue. The Covina Police Department has 101 personnel, which includes 59 sworn (1 Chief, 2 Captains, 4 Lieutenants, 9 Sergeants, and 43 Police Officers) and 42 non-sworn positions. Based on the California Department of Finance estimate that 48,683 residents lived within the City in 2019, the City's sworn officer to population ratio is 0.83 officers per 1,000 population. In 2019, officers responded to 35,867 calls for service and incidents of proactive enforcement activity and had the following responses times per service call priority:

- Priority One – 4 minutes and 28 seconds
- Priority Two – 12 minutes
- Priority Three – 16 minutes

School Services. The Project area is located within the Covina Valley Unified School District (CVUSD) boundary, which serves the communities of Covina, West Covina, Glendora, San Dimas, and Irwindale and has a total of 18 schools, including: nine elementary schools, three middle schools, and four high schools, one children's center, and one nonpublic, nonsectarian school (CDE 2019).

Covina Valley Unified School District's school facilities had an enrollment of 11,713 students in the 2018/2019 school year (CDE 2019). The Project area is in the attendance areas of Grovecenter Elementary School (775 N. Lark Ellen Avenue, West Covina), which is approximately 0.5 miles from the site; Las Palmas Middle School (641 N. Lark Ellen Avenue, Covina), which is approximately 0.6 miles from the site; and Northview High School (1016 W. Cypress Street, Covina), which is approximately 1.4 miles from the site (CVUSD 2020). As shown on Table 4-8, the enrollment for these schools in ranged by 110 students in the elementary school, 121 students in the middle school, and 141 students in the high school between the 2019-2020 and the 2013-2014 school years.

Table 4-8: School Enrollment Between 2019-20 and 2013-14

School	2019-20	2018-19	2017-18	2016-17	2015-16	2014-15	2013-14
Grovecenter Elementary School	555	589	577	499	479	489	500
Las Palmas Middle School	805	860	900	878	844	870	926
Northview High School	1,265	1,247	1,274	1,314	1,333	1,346	1,388

Source: California Department of Education.

Other Services. Library services are provided by the Covina Public Library located at 234 North Second Avenue, Covina, CA 91723. The library supports a variety of resources, including computers and wireless

internet access; journal articles, magazines, and newspapers; literacy programs; homework help programs; and computer tutoring sessions. The library also supports a community room that can be rented by non-profit and commercial groups (City of Covina 2018).

4.14 PARKS AND RECREATION

The Open Space, Parks, and Recreation Element of the Covina General Plan states that the City has approximately 63.5-acres of accessible parkland/open space across seven parks, one plaza, and two ball fields. Based on the 2019 population estimate of 48,683 residents, the City has approximately 1.30 acres of public park and/or recreational space per every 1,000 residents. The existing parks, plaza, and ball fields within the City of Covina are listed in Table 4-9.

Table 4-9: City of Covina Existing Recreation Facilities

Park Facility	Amenities	Acreage	Miles from Project Site
Savoy Field 1359 East Cypress Street	Ball field(s).	5.0 acres	1.1 miles
Covina Park 303 North Fourth Avenue	Bandshell, baseball field(s), basketball courts, community room, horseshoe pit, jogging track, picnic tables, picnic shelter, playground, recreational hall, softball field(s), swimming pools, and tennis courts.	10.0 acres	1.2 miles
Heritage Plaza Park 400 North Citrus Avenue	Playground, performance platforms, picnic tables.	1.5 acres	1.3 miles
Edna Park 220 West Edna Place	Picnic tables and playground.	2.5 acres	1.4 miles
Cougar Park 150 W. Puente Street	Community center, community garden, playground, picnic tables, and splash pad.	1.0 acre	1.6 miles
Xalapa Park 1321 East Garvey Avenue North	Picnic tables, and playground.	2.5 acres	1.6 miles
Hollenbeck Park 1250 North Hollenbeck Avenue	Baseball field(s), basketball courts, football field, picnic tables, playground, scout houses, soccer field, and softball field(s)	10.0 acres	1.7 miles
Kelby Park 815 North Barranca Avenue	Community room, Joslyn Center, picnic tables, playground, scout houses, and soccer field.	7.0 acres	2.1 miles
Kahler Russell Park 735 North Glendora Avenue	Baseball field(s), basketball courts, football field, picnic tables, picnic shelter, playground, hockey, tennis, soccer field, softball field(s), and nature trails.	17.0 acres	2.4 miles
Heyler Field 303 South Glendora Avenue	Ball field(s).	5.0 acres	3.0 miles
Banna Park Cypress Street and Banna Avenue	Dog Park and Tot Lot	2.0 acres	3.5 miles
Total Acreage of Parkland		63.5 acres	

Source: City of Covina 2000.

In addition to the City parks and ball fields described above, the Covina-Valley and Charter Oak School Districts and large private schools manage several campuses in and around the City that provide supplemental green space and recreational facilities, such as gymnasiums, to City residents subject to the allowable hours by the schools. Additionally, there are several County recreational facilities located near the City that are often used by City residents. The closest of these facilities is Charter Oak Park, located at 20261 East Covina Boulevard in an unincorporated neighborhood. Charter Oak Park is a 19-acre open space land providing generally similar amenities to those found in City parks, such as ball fields, basketball courts, and playgrounds (City of Covina 2000). Charter Oak Park is located approximately 3.7 miles east of the Project site.

4.15 TRANSPORTATION

Traffic Study Area and Existing Levels of Service. The traffic study area was identified based on direction from City of Covina staff and includes eight roadways, which are detailed in Table 4-10.

Table 4-10: Existing Study Area Roadway Descriptions

Roadway	Classification	Travel Lanes		Median	Speed Limit
		Direction	No. of Lanes		
Lark Ellen Avenue	Secondary Highway Collector Residential Main	NB-SB	4	N/A	40
-North of Queensdale Drive		NB-SB	4	N/A	40
-North of Grovecenter Street		NB-SB	4	N/A	40
-South of Grovecenter Street					
Rimsdale Avenue	Local Street	NB-SB	2	N/A	25
Azusa Avenue	Primary Arterial Mixed-Use Thoroughfare	NB-SB	4	Raised	40
-North of Badillo Street		NB-SB	4	Medians	40
-South of Badillo Street					
Hollenbeck Avenue	Collector	NB-SB	4 to 2	N/A	35
Cypress Street	Secondary Highway Collector	EB-WB	4	N/A	40
-West of Leaf Avenue		EB-WB	4	N/A	40
-East of Leaf Avenue					
San Bernardino Road	Collector	EB-WB	4	N/A	35 to 40
Badillo Street	Mixed-Use Main Secondary Arterial	EB-WB	4	Raised	40
-West of Lark Ellen Avenue		EB-WB	4	Medians	45
-East of Lark Ellen Avenue					
Puente Avenue	Residential Main	EB-WB	4 to 2	N/A	40

Source: TIS, Appendix L.

The traffic study area also includes 13 study intersections that provide local access to the Project site. Seven of the 13 study intersections are located within the City of Covina, two study intersections are located within the City of West Covina, three study intersections are shared between the Cities of Covina and West Covina, and one study intersection is located within the unincorporated area of the County of Los Angeles. The study intersections include the following:

1. Lark Ellen Avenue/Cypress Street (Los Angeles County)
2. Lark Ellen Avenue/San Bernardino Road (Covina, West Covina)
3. Lark Ellen Avenue/Badillo Street (Covina, West Covina)
4. Lark Ellen Avenue/Puente Avenue (West Covina)
5. Rimsdale Avenue/San Bernardino Road (Covina)
6. Rimsdale Avenue/Badillo Street (Covina)
7. Azusa Avenue/Cypress Street (Covina)
8. Azusa Avenue/San Bernardino Road (Covina)
9. Azusa Avenue/Badillo Street (Covina, West Covina)

10. Azusa Avenue/Puente Avenue (West Covina)
11. Armel Drive/Badillo Street (Covina)
12. Hollenbeck Avenue/San Bernardino Road (Covina)
13. Hollenbeck Avenue/Badillo Street (Covina)

Twelve of the 13 study intersections selected for analysis are currently controlled by traffic signals. Intersection 11 (Armel Drive and Badillo Street), is the controlled by stop signs on Armel Drive. The existing traffic volumes for intersections based on peak hour intersection turn movement counts and daily counts collected in September 2019. Table 4-11 shows that one of the study intersections (i.e., Intersection No. 10: Azusa Avenue/Puente Avenue) is currently operating at LOS E during the weekday PM peak hour.

Table 4-11: Existing Intersection Levels of Service

Intersection	Peak Hour	Delay	LOS
1 Lark Ellen Avenue / Cypress Street [c]	AM PM	0.697 0.765	B C
2 Lark Ellen Avenue / San Bernardino Road [a,b]	AM PM	0.639 0.666	B B
3 Lark Ellen Avenue / Badillo Street [a,b]	AM PM	0.650 0.727	B C
4 Lark Ellen Avenue / Puente Avenue [b]	AM PM	0.624 0.643	B B
5 Rimsdale Avenue / San Bernardino Road [a]	AM PM	0.374 0.544	A A
6 Rimsdale Avenue / Badillo Street [a]	AM PM	0.531 0.457	A A
7 Azusa Avenue / Cypress Street [a]	AM PM	0.649 0.714	B C
8 Azusa Avenue / San Bernardino Road [a]	AM PM	0.669 0.678	B B
9 Azusa Avenue / Badillo Street [a,b]	AM PM	0.775 0.829	C D
10 Azusa Avenue / Puente Avenue [b]	AM PM	0.872 0.903	D E
11 Armel Drive/ Badillo Street [a,d]	AM PM	33.3 32.3	D D
12 Hollenbeck Avenue / San Bernardino Road [a]	AM PM	0.771 0.847	C D
13 Hollenbeck Avenue / Badillo Street [a]	AM PM	0.657 0.706	B C

Source: TIS, Appendix L.

[a] City of Covina Threshold; [b] City of West Covina Threshold; [C] County of Los Angeles Threshold

Bold = Exceeds LOS Standard/Threshold Exceedance

Existing Site Access. Vehicular access to the existing site for Planning Areas 1 and 2 (the development portion of the Project site) is currently provided by seven existing curb cuts, including: one driveway on San Bernardino Road, three driveways on Rimsdale Avenue, and three driveways on Badillo Street.

Existing Transit Service. The Project site is served by bus service via Foothill Transit Authority and the City of West Covina and train service by Metrolink. The Foothill Transit Authority operates one local bus routes to the vicinity of the Project (Route 190). Route 190 operates along Badillo Street and North Citrus Avenue with service to the Cities of El Monte, Baldwin Park, and Pomona. Route 190 operates with 15-minute headway during the weekday AM and PM peak periods.

The Metrolink Covina Station is located approximately 1.5 miles to the east of the Project site at 600 North Citrus Avenue and connects with the public bus system. The Metrolink provides direct access to Downtown Los Angeles (to the west) and San Bernardino (to the east). As summarized in Table 4-12, during the weekday AM peak hour, three trains per hour are provided at the Covina station: two travel westbound to Los Angeles Union Station, and one travels eastbound to the City of San Bernardino. During the weekday PM peak hour, three trains per hour are provided at the Covina station: two travel eastbound to the City of San Bernardino, and one travels westbound to Los Angeles Union Station. Parking is provided at an on-site surface lot and an adjacent garage, both of which are City-owned.

Table 4-12: Existing Transit Routes

Route	Destinations	Location Near Site	Service During Weekday Peak Hour		
			Direction	AM	PM
Foothill Transit 190	Pomona to El Monte via Covina, West Covina, and Baldwin Park	Lark Ellen Avenue, Rimsdale Avenue, Azusa Avenue, San Bernardino Road	EB WB	4 4	4 3
Foothill Transit 280	Puente Hills to Azusa via La Puente, West Covina, and Covina	Azusa Avenue, San Bernardino Road, Badillo Street, Puente Avenue	NB SB	4 4	4 4
Foothill Transit 488	Glendora to El Monte via Covina, West Covina, and Baldwin Park	Lark Ellen Avenue, Azusa Avenue, Rowland Avenue	EB WB	3 3	2 2
West Covina Blue Line	City of West Covina	Lark Ellen Avenue, Badillo Street	Circular	2	2
West Covina Red Line	City of West Covina	Azusa Avenue, Puente Avenue	Circular	2	2
Metrolink	San Bernardino to Downtown Los Angeles via Rialto, Fontana, Rancho Cucamonga, Upland, Montclair, Claremont, Pomona, Covina, Baldwin Park, El Monte and Cal State LA				
		Citrus Avenue, Front Street	EB WB	1 2	2 1
			Total	29	26

Source: TIS, Appendix L.

Existing Bicycle and Pedestrian Facilities. Bicycle facilities within 0.25 mile of the Project site include:

- a Class II bicycle lane on W. Badillo Street from Lark Ellen Avenue to Cypress Street;
- a Class II bicycle lane on San Bernardino Road west of Hollenbeck Avenue and east of Second Avenue;
- a Class III Bike lane on San Bernardino Road from Hollenbeck Avenue to Second Avenue.

Additionally, sidewalks currently exist adjacent to the site along W. San Bernardino Road, N. Rimsdale Avenue, and W. Badillo Street.

4.16 TRIBAL CULTURAL RESOURCES

Native American Tribes. The Project site is located within the ethnographic territory of the Gabrielino or Tongva Indians. The Gabrielino are Takic-speakers and descended from Late Prehistoric populations of the region. The name Gabrielino was given to the local inhabitants by Spanish Missionaries who established a mission in Gabrieleno territory in 1771.

The territory of the Gabrieleño at the time of Spanish contact covered much of current-day Los Angeles, San Bernardino, and Orange Counties. The southern region of this cultural area is bound by Aliso Creek, the eastern region is located east of San Bernardino along the Santa Ana River, the northern region includes the

San Fernando Valley, and the western region includes portions of the Santa Monica Mountains. The Gabrieleño also occupied several Channel Islands including Santa Barbara Island, Santa Catalina Island, San Nicholas Island, and San Clemente Island. Because of their access to certain resources, including a steatite source from Santa Catalina Island, this group was among the wealthiest and most populous aboriginal groups in southern California. Trade of materials and resources controlled by the Gabrieleño extended as far north as the San Joaquin Valley, as far east as the Colorado River, and as far south as Baja California.

Major Gabrielino villages or communities near the Project site included Ashuukshanga to the north and Weniinga to the south. Weniinga was located within what is now the City of Covina. The word Weniinga means “one of the places where metates, etc., or anything is discarded as about an Indian camp”.

Rivers and streams were used as trading routes and travel routes as they provided resources. Thus, many tribal cultural resources are found along rivers, streams, and other known travel or trade routes. The Project site does not include, and is not located near a river, stream, or identified corridor that could have been a travel or trade route.

Project Site Ground Disturbances. The Phase I Environmental Site Assessment that was prepared for Planning Areas 1 and 2 (Phase I 2019) describes the existing commercial buildings were developed in the 1950s. In addition, a review of historical records indicates that a former railroad line was adjacent to the southern boundary of the Project site until circa 1950, and an orchard was onsite between approximately 1928 and circa 1960, which resulted in shallow soil disturbances.

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Noise Impact Analysis. Prepared by Urban Crossroads. Appendix K.

Preliminary Low Impact Development Plan. Prepared by Hunsaker & Associates Irvine, Inc. Appendix I.

Preliminary Hydrology Report. Prepared by Hunsaker & Associates Irvine, Inc. Appendix J.

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Supplemental VMT Analysis for the Covina Bowl Specific Plan Project. Prepared by Linscott Law & Greenspan (LL&G) Engineers. Appendix L.

Traffic Impact Study for the Covina Bowl Specific Plan Project. Prepared by Linscott Law & Greenspan (LL&G) Engineers. Appendix L.

5.0 Environmental Impact Analysis

This Chapter focuses on evaluating the significant environmental effects of the proposed Project, which is described in Chapter 3, *Project Description*. This Chapter describes the existing physical environmental setting (also referred to as “baseline”) for each environmental topic, and the impacts that would result from implementation of proposed Project. Because existing federal, state, and local regulations will also shape how the proposed Project is implemented, and provide requirements for avoiding and reducing environmental impacts, a discussion of relevant regulations, plans, programs, and policies pertinent to each environmental issue addressed in each environmental topic section is provided. Additionally, as necessary, feasible mitigation measures are identified to reduce the significant impacts of the proposed Project.

Environmental Topics

The following sections in this chapter analyze the environmental topics listed below:

- | | |
|-------------------------------------|---------------------------------|
| 5.1 Aesthetics | 5.8 Hydrology and Water Quality |
| 5.2 Air Quality | 5.9 Land Use and Planning |
| 5.3 Cultural Resources | 5.10 Noise |
| 5.4 Energy | 5.11 Public Services |
| 5.5 Geology and Soils | 5.12 Recreation |
| 5.6 Greenhouse Gas Emissions | 5.13 Transportation |
| 5.7 Hazards and Hazardous Materials | 5.14 Tribal Cultural Resources |
| | 5.15 Mandatory CEQA Findings |

This EIR evaluates the direct and indirect impacts resulting from construction and ongoing operations of the proposed Project. Under CEQA, EIRs are intended to focus their discussion on significant impacts and may limit discussion of other impacts to a brief explanation of why the impacts are not significant. The Notice of Preparation (NOP) that was prepared for the proposed Project and the responses received were used to help determine the scope of the environmental issues to be addressed in the EIR. Consistent with CEQA Guidelines Section 15128, issues considered Potentially Significant are addressed in this EIR. Issues areas that would not be potentially impacted by the Project (including: agricultural and forest resources, biological resources, mineral resources, population and housing, utilities and service systems, and wildfire), are not addressed beyond the discussion contained in Section 2.2, *EIR Scope and Content* and Section 5.14, *Mandatory CEQA Findings*.

Format of Environmental Topic Sections

Each environmental topic section generally includes the following main subsections:

- **Regulatory Setting:** This subsection describes applicable federal, state, and local plans, policies, and regulations that the proposed project must address, and will shape its implementation.
- **Existing Conditions:** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance:** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are “significant.”
- **Methodology:** This subsection provides a description of the methods used to analyze the impact and determine whether it would be significant or less than significant.

- **Environmental Impacts:** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
 - A statement of the CEQA threshold being analyzed,
 - The EIR's conclusion as to the significance of the impact.
 - An impact assessment that evaluates the changes to the physical environment that would result from proposed project.
 - An identification of significance comparing identified impacts of the proposed project to the significance threshold with implementation of any existing regulations, prior to implementation of any required mitigation.
 - A discussion of potential cumulative impacts that could occur from implementation of the proposed project and other cumulative projects.
 - A list of any existing regulations that reduce potential impacts.
 - For each impact determined to be potentially significant, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
 - avoid a significant impact;
 - minimize the severity of a significant impact;
 - rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
 - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the project; and/or
 - compensating for the impact by replacing or providing substitute resources or environmental conditions.
 - Actions to be taken to ensure effective implementation of required mitigation measures.

Environmental Setting/Baseline

The "Environmental Setting" subsections describe current conditions regarding the environmental resource area reviewed. CEQA Guidelines Section 15125 states that "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. The environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed project and its alternatives." This baseline includes the list of past, present and probable future cumulative projects for which applications were submitted to lead agencies prior to publishing of the NOP.

A NOP for the proposed project was distributed on January 23, 2020 for a 30-day public review and comment period that ended on February 24, 2020. This time period consists of the baseline. The baseline conditions relevant to the environmental issues being analyzed are described within each subsection of this chapter. CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). In some instances, environmental conditions, such as air quality, may vary from year to year, and in some cases, it is necessary to consider conditions over a range of time periods. Also, in some cases, (such as in Section 5.1, *Aesthetics*), discussion of baseline conditions is also provided in the impacts analyses to provide context for the impact in the most reader-friendly format and organization.

Thresholds of Significance/Significance Criteria

CEQA Guidelines Section 15382 defines a significant effect on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

The “Thresholds of Significance” subsections provide the specific thresholds of significance by which impacts are judged to be significant or less than significant in this EIR. These include identifiable quantitative or qualitative standards or sets of criteria pursuant to which the significance of each given environmental effect can be determined. Exceedance of a threshold of significance normally means the effect will be determined to be “significant” (CEQA Guidelines Section 15064.7(a)). However, an iron-clad definition of a “significant” effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064(b)). Therefore, a Lead Agency has the discretion to determine whether to classify an impact described in an EIR as “significant,” depending on the nature of the area affected. The thresholds of significance used to assess the significant of impacts are based on those provided in Appendix G of the CEQA Guidelines.

Impact Significance Classifications

The following classifications are used throughout the impact analysis in this EIR to describe the level of significance of environmental impacts:

- **Significant Impact:** A significant impact is defined by Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself “shall not be considered a significant effect on the environment ... [but] may be considered in determining whether the physical change is significant.” As defined in this EIR, a significant impact exceeds the defined significance criteria and therefore requires mitigation.
- **No Impact:** No adverse effect on the environment would occur, and mitigation measures are not required.
- **Less than Significant Impact:** The impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.
- **Less than Significant Impact with Mitigation Incorporated:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. Feasible mitigation measures, including standard conditions of approval and applicable plans, programs, and policies, when implemented, will reduce the significant impact to a less-than-significant level.
- **Significant and Unavoidable Impact:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. However, application of all feasible mitigation measures, standard conditions of approval, and applicable plans, programs, and policies would not reduce the impact to a less-than-significant level, and a significant and unavoidable impact would remain.

While CEQA requires that an EIR identify all feasible mitigation to avoid or reduce the significant impacts of a project, it also permits public agencies to approve a project even though it would result in one or more significant unavoidable environmental effects. For a Lead Agency to approve a project with one or more significant unavoidable impacts, it must first prepare a statement of overriding considerations, which identifies the specific economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, that outweigh its significant unavoidable effects, and thereby warrant its approval (Public Resources Code Section 21083; CEQA Guidelines Section 15093). The statement of overriding considerations must be supported by substantial evidence in the record (CEQA Guidelines Section 15093(a)).

Cumulative Impacts

Cumulative impacts refer to the combined effect of the proposed project's impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts. According to Section 15355 of the CEQA Guidelines, 'cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- a) The individual effects may be changes resulting from a single project or a number of separate projects.
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this EIR focuses on whether the impacts of the proposed project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects.

Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed project would have no environmental impact. Analysis of cumulative impacts is, however, provided for all project impacts that are evaluated within this EIR.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for air quality, greenhouse gas emissions, and transportation relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as Southern California Regional Transportation Plan and relevant regional plans developed by the Southern California Association of Governments (SCAG). The cumulative analyses for other environmental issues use the list of projects approach, and identifies the list of past, present, and probable future projects that were known of at the time the NOP was published. As described previously, the cumulative project list is part of the environmental setting/baseline that includes past, present and probable future projects for which development applications were submitted to lead agencies prior to publishing of the NOP.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to specific viewsheds. Thus, in assessing aesthetic resources impacts, only development within and immediately adjacent to the project area would contribute to a cumulative visual effect is analyzed, whereas cumulative traffic impacts are based upon all development within the traffic study area of roadways and intersections. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic.

Table 5-1 provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by each agency, and Figure 5-1 shows the locations. Cumulative projects shown on Table 5-1 are either under consideration or approved but are not yet constructed.

Table 5-1: Cumulative Project List

Project No.	Project Status	Project Name	Land Use	Size	
		Address/Location			
City of Covina					
C1	Under Construction	City Ventures Covina 3	Condominium	68	DU
	Complete	400 Block North Citrus Avenue	Retail	5,794	GLSF
C2	Approved	Covina Townhomes (Site A)	Townhome	161	DU
		NWC of Citrus Avenue &	Restaurant	3,800	GSF
		San Bernardino Road	Retail	13,500	GLSF
C3b	Under	Covina Townhomes	Townhome	18	DU
C3c	Construction	(Sites B1, B2 & C)	Retail	3,370	GLSF
			Office	1,030	GSF
C4	Complete	1162 North Citrus Avenue	Condominium	117	DU
C5	Approved	North Citrus Avenue &	Office	15,000	GSF
		East Covina Boulevard	Event Center	25,000	GSF
C6	Under	276 West Dexter Street	Condominium	3	DU
	Construction				
C7	Under	172 East Center Street	Apartment	5	DU
	Construction				
C8	Approved	525 South Citrus Avenue	Retail/Office	5,900	GLSF
			Restaurant	5,000	GSF
C9	Complete	Covina Transit Center	Retail	4,800	GLSF
	Complete	Park & Ride	Parking Structure	359	Spaces
		North Citrus Avenue &			

Project No.	Project Status	Project Name	Land Use	Size	
		Address/Location			
		Covina Boulevard			
City of West Covina					
WC1	Proposed	Chick-fil-A	Restaurant	4,214	GSF
		200 South Vincent Avenue			
		1611-1623 West San Bernardino Road			
WC2	Proposed		Condominium	24	DU
County of Los Angeles					
LC1	Proposed	16741 East Arrow Hwy	Retail	1,856	GLSF

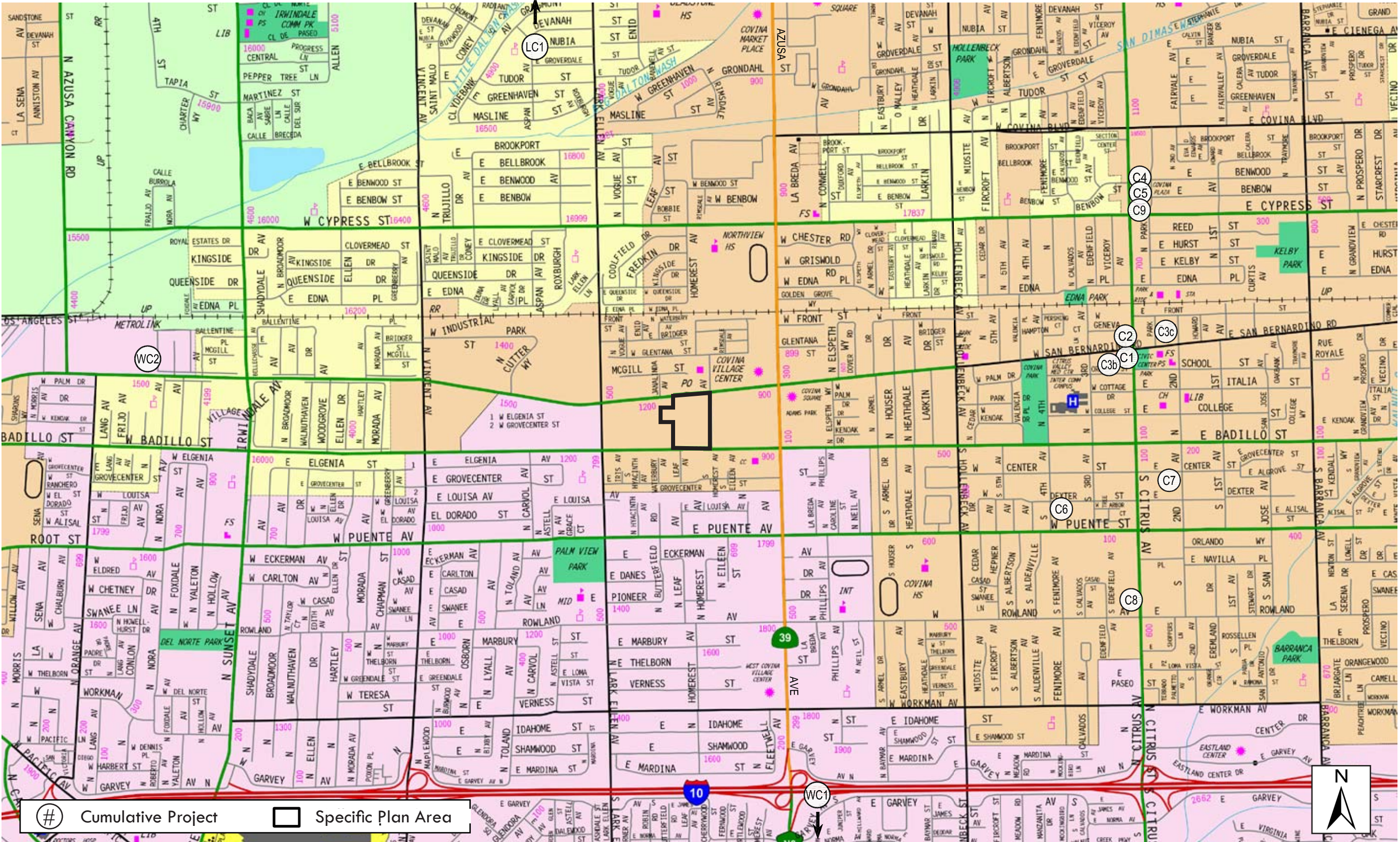
DU = Dwelling Unit

GSF = Gross Square Feet

GLSF = Gross Leasable Square Feet

In addition to the development projects listed in Table 5-1, evaluation of the cumulative condition within this EIR includes buildout of Planning Areas 3 and 4. While no specific development is proposed at this time for Planning Areas 3 and 4, the maximum potential buildout of these areas within the Specific Plan are included as part of the Year 2040 condition to provide a conservative analysis of potential impacts. Based on maximum General Plan buildout, Planning Area 3 includes the removal of the existing office space and development of a 4,175 square-foot retail space. Planning Area 4 includes removal of the existing 31-unit apartment building and 4,652 square foot restaurant and development of 37,244 square feet of retail space or multi-family residential units.

Cumulative Projects



Source: Linscott, Law & Greenspan, engineers

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5.1 Aesthetics

5.1.1 INTRODUCTION

This section describes the existing visual setting and aesthetic character of the Project site and vicinity and evaluates the potential for the proposed Project to impact the visual character and quality, and light and glare. This analysis focuses on changes that would be seen from public viewpoints and provides an assessment of whether aesthetic changes from implementation of the Project would result in substantially degraded aesthetic conditions.

Aesthetics Terminology

- **Aesthetic Resources** include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, that provide an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area, but also communicate the value placed upon a landscape or scene by its observers.
- **Scenic Resources** are visually significant hillsides, ridges, water bodies, and buildings that are critical in shaping the visual character and scenic identity of the area and surrounding region.
- **Scenic Vistas** are defined as panoramic views of important visual features, as 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.
- **Visual Character** broadly describes the unique combination of aesthetic elements and scenic resources that characterize a particular area. The quality of an area's visual character can be qualitatively assessed considering the overall visual impression or attractiveness created by the particular landscape characteristics. In urban settings, these characteristics largely include land use type and density, urban landscaping and design, architecture, topography, and background setting.

5.1.2 REGULATORY SETTING

City of Covina General Plan

City policies pertaining to visual character are contained in the Land Use Element of the General Plan. The existing General Plan goals and policies that are relevant to the Project include the following:

- Policy 1.7:** Require that new or expanded commercial, industrial, and medium- to high-density residential Projects, when adjacent to single-family residences, hospitals, nursing homes, schools, daycare centers, and other sensitive uses, incorporate sufficient physical and visual buffers to ensure compatibility. Such buffers shall include, but not be limited to, building setback and architecture, landscaping, walls, and other physical and aesthetic elements and shall adequately protect the single-family residences or sensitive uses from noise, light, trash, vehicular traffic, and other visual and environmental disturbances.
- Policy 2.14:** Require, except where community goals, objectives, and policies are best furthered, that both new and remodeled residential developments comply with zoning and other standards, incorporate adequate amenities, and achieve a high level of architectural and site design

quality to ensure a high quality of life for local residents and to ensure long-term building maintenance and viability.

Policy 2.18: Encourage the maintenance of and, where necessary, the improvement of the physical and aesthetic condition of all buildings in all areas.

Policy ee: Maintain and, where possible, enhance Covina's attractive appearance, positive image, and small-town character.

City of Covina Municipal Code

Section 17.28.430, Lighting. All lighting of the building, landscaped parking area or similar facilities shall be so hooded and erected so as to reflect away from adjoining properties.

Section 17.28.460, Landscaping. All yard areas are to be entirely landscaped with ground cover, trees, shrubs, and other plant materials including, where an integral part of a landscaped scheme comprised primarily of plant materials, such items as fountains, ponds, sculptures and planters. Recreation facilities other than in a building may be permitted in areas not visible from a public right-of-way.

The planning director shall approve the size and plant material to be in harmony with the development and to be in scale with the structures. All trees and ground cover in the parkway shall be approved by the director of public works. All landscape areas shall be served by an irrigation system approved by the planning director.

5.1.3 ENVIRONMENTAL SETTING

Aesthetic resources include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, that impart an overall visual impression that is pleasing to, or valued by, its observers.

Visual Character of the Project Site

The visual character of the Project area is urban and developed. The Project site is developed with several structures that include a vacant bowling center and commercial strip building, vacant daycare building, office building, church, restaurant, and 31-unit multi-family residential building.

The existing structures total approximately 77,953 square feet of non-residential uses and 32,589 square feet of residential and retail uses, which include parking areas and vehicle circulation drives.

The existing vacant bowling center, vacant daycare, office, church, and restaurant are one-story in height, and the existing multi-family residential building is two-stories in height. The Project site includes ornamental trees scattered throughout the site, and street trees along W. Badillo Street, W. San Bernardino Road, and N. Rimsdale Avenue.

The exteriors of the buildings are distinguished by detailing around the entrances that include steel framed or wood framed doorways. The vacant daycare, office, and restaurant have a typical boxy modern office/retail structure appearance with distinguishable signage. The existing restaurant contains a large three-story sign with multiple smaller signs throughout and is a prominent feature to motorists along W. San Bernardino Road.

The Covina Bowl. This building has character-defining features of the Googie style architecture, including: a prominent pyramid building entry, the folded plate entrance canopy, and the 60-foot high reverse triangular neon sign with a letter "C"; metal-framed fenestration, aluminum-framed windows, triangular façade baffles, and Bouquet Canyon Rock walls, and angled exposed structure awnings. Other existing

architecture includes a Mayan-themed concrete block curved wall located beneath the pyramid entry. In addition, the Covina Bowl building has a flat roof, steel framing, and consists of tilt-up precast concrete walls.

The building is surrounded on three sides with asphalt surface parking and low-raised planters with subtropical plantings, large accent boulders, and the original tiki lights.

Vacant Daycare Building. Chain-link fencing currently surrounds the vacant 2,994 square foot one-story building that is located on the southwestern portion of the Project site. The building is generally gray and rectangular with ceramic tile across along the front. Fenestration includes aluminum-framed, sliding windows. The front setback of the parcel provides a parking area for the daycare, and approximately eight mature citrus trees are located to the rear of the building.

Office Building. This 4,175 square-foot one-story office building faces south adjacent to W. Badillo Street. The rectangular building is non-descript and consists of stucco and painted brick veneer with a raised planter with ornamental landscaping is adjacent to the street. The building is urban in character and is adjacent to an onsite parking lot.

Church. The existing church building is a wood-framed, square building that is capped by a low-pitched, cross-gabled roof covered with composition shingles. The fenestration is a mix of steel-framed casement façade windows with diamond-paned, stained glass, two jalousie windows with stained glass near the façade on the east side, and original wood-framed double-hung windows.

A parking lot for the church is located behind the building, with driveway access from W. Badillo Street. A lawn is located in the front of the building in the street setback, and several mature citrus trees are located on the west side and in the rear of the church parcel.

Restaurant. The existing restaurant is within a one-story building that has several rooftop mechanical structures that are visible from the street level, which include HVAC and venting equipment. Closer to W. San Bernardino Avenue are three prominent identification signs mounted atop poles that are much higher than the adjacent buildings' roof. The frontage has an area of sparse ground cover vegetation next to a concrete sidewalk with vehicle parking areas adjacent to the building.

Multi-family Residential Building. The 31-unit multi-family residential building is two stories in height and is visible in the background, beyond the existing restaurant building. There is a small identification sign mounted atop poles at the entrance driveway to the community along the W. San Bernardino Avenue frontage. There is an existing block wall, with a small identification sign atop, and a wrought-iron gate at the entrance to the community beyond the parking lot adjacent to the existing restaurant building.

Viewpoints

There are several different views of the Project site from off-site locations as shown in Figure 5.1-1, *Viewpoint Locations*, and are described below.

Views 1, 2, and 3: Existing Views from W. Badillo Street. As shown on Figures 5.1-2 and 5.1-3, views of the Project site from W. Badillo Street include views of the one-story church, set back behind a lawn area, the one-story vacant daycare, and a one-story office building. In addition, views of the site from W. Badillo provide forefront views of a surface parking lot and background views of the Covina Bowl building. Scattered ornamental trees can also be seen from the street. A sidewalk and street trees exist along W. Badillo Street adjacent to the site. The closest building to W. Badillo Street is the existing one-story office, which is setback approximately 260 feet from the sidewalk.

View 4: Existing View from N. Rimsdale Avenue. As shown on Figures 5.1-3, views of the Project site from N. Rimsdale Avenue include views of parking areas, the vacant commercial and bowling building, and some ornamental landscaping. A sidewalk and street trees exist along N. Rimsdale Avenue adjacent to the site.

The Covina Bowl freestanding sign sits adjacent to the entrance of the former Covina Bowl building. Large commercial buildings (including a Home Depot) are located across N. Rimsdale Avenue from the site.

Views 5 and 6: Existing Views from W. San Bernardino Road. As shown on Figure 5.1-4, views of the Project site from W. San Bernardino Road include views of parking areas and the north side of the Covina Bowl building, scattered ornamental trees on the site, and street trees along the sidewalk. A large freestanding “Brunswick Covina Bowl” sign can be seen in forefront views from W. San Bernardino Road. Existing one-story commercial buildings and signage across W. San Bernardino Avenue from the Project site can also be seen. The existing one-story restaurant and large freestanding signage encompasses forefront views to the west of the Covina Bowl. The existing two-story multi-family residential building can be seen in the background.

Visual Character of Adjacent Areas

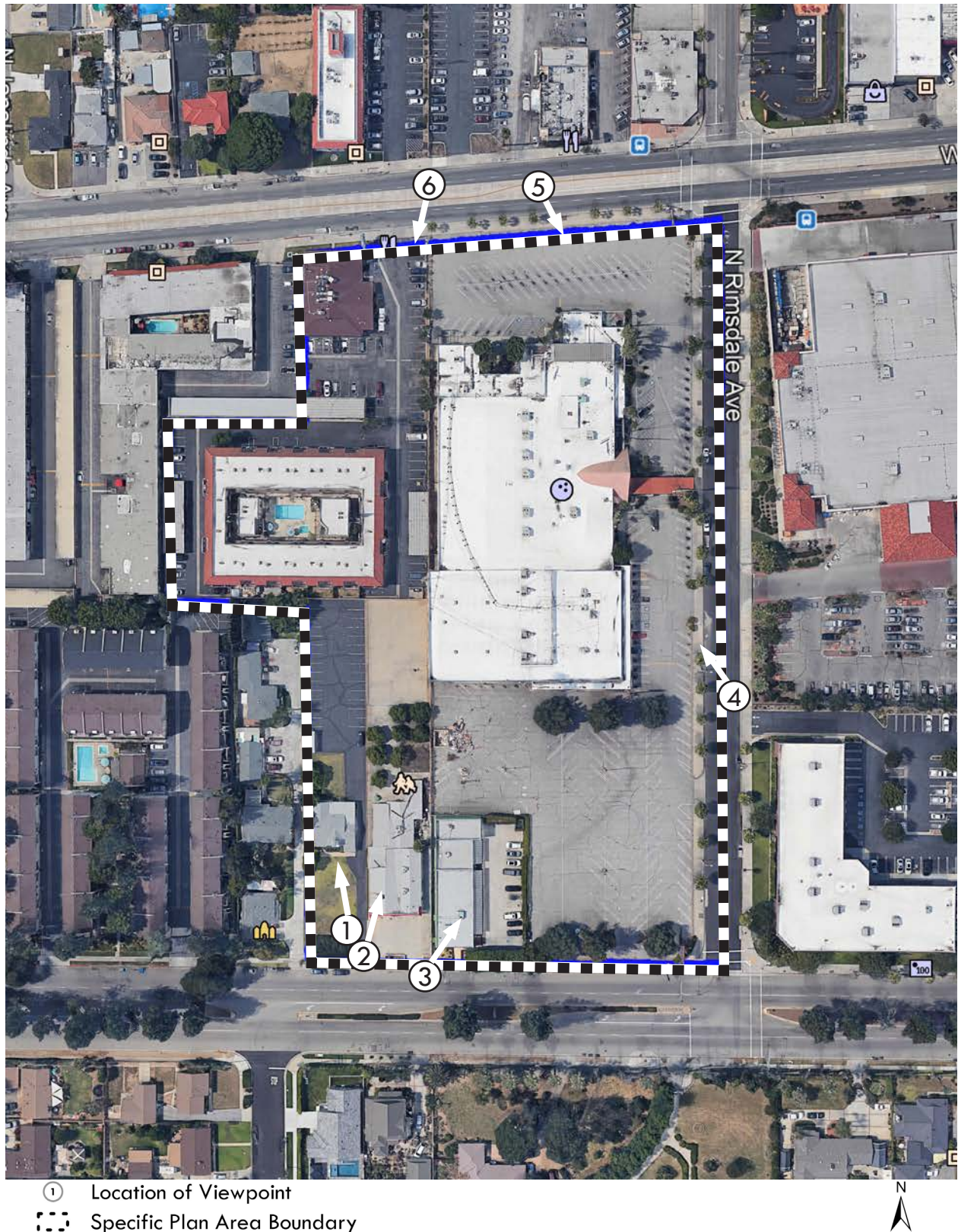
The existing visual character of the area surrounding the Project site is urban. There is no consistent architectural or visual theme within the surrounding area and significant visual resources are limited. The parcel across N. Rimsdale Avenue is developed with a Costco store and associated parking areas. Areas across W. San Bernardino Road from the Project site is commercial in nature. Areas across from the site, on the northeast corner of W. San Bernardino Road and N. Rimsdale Avenue, are developed with single-story rectangular urban buildings that are used for commercial and retail uses. In addition, the area directly across W. Badillo Street from the Project site is developed with one-story and two-story single-family residences with associated driveways, fencing, and landscaping. The foreground views of the areas are dominated by mostly chain-link fencing adjacent to the W. Badillo Street right-of-way, street trees, and landscaping.

Light and Glare

Nighttime lighting associated with the existing urban development is present both onsite and within the surrounding area. Existing lighting includes streetlights along W. San Bernardino Road, W. Badillo Street, and N. Rimsdale Avenue, parking lot and building façade lighting, interior illumination passing through windows, and illumination from vehicle headlights. Sensitive receptors relative to lighting and glare include motorists and pedestrians passing through the Project site.

Glare can emanate from many different sources, some of which include direct sunlight, sunlight reflecting from buildings, and bright outdoor or indoor lighting. Currently, there are no buildings, structures, or facilities in the Project site that generate substantial glare, as most of the buildings are constructed of non-reflective materials and do not have a substantial number of windows adjacent to one another that would create a large reflective area.

Viewpoint Locations



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Existing Site Views from W. Badillo Street

①



View looking north showing the Unity Church at the southwest corner of the Specific Plan area.

②



View looking northeast showing the vacant day care building.

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Existing Site Views from W. Badillo and N. Rimsdale

3



View from West Badillo Street of onsite office building.

4



View from North Rimsdale Avenue of Covina Bowl building.

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Existing Site Views from W. San Bernardino Road

5



View looking southeast at the Covina Bowl building and Brunswick Covina Bowl Sign.

6



View looking south showing the Mar Y Tierra Restaurant

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5.1.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- AE-1 Have a substantial adverse effect on a scenic vista?
- AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- AE-3 In nonurbanized 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?
- AE-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The Initial Study established that the proposed Project would not result in impacts related to Thresholds AE-1 and AE-2; and no further assessment of these impacts is required in this EIR.

5.1.5 METHODOLOGY

Aesthetic resources were assessed based on the visual quality of the Project site and surrounding area and the changes that would occur from implementation of the proposed Project. The assessment of aesthetic character and quality impacts is subjective by nature. Thus, within an urban environment, the evaluation of aesthetic character identifies the proposed Project development characteristics and its expected appearance and compares it to the existing visual environment on and adjacent to the site and the regulations governing scenic quality, such as General Plan regulations, zoning code regulations, and Specific Plan regulations.

The analysis of light and glare identifies light-sensitive land uses and describes the Project's proposed light and glare sources, and the extent to which the proposed lighting, including illuminated signage, could spill out the Project site onto adjacent existing and future light-sensitive areas. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

5.1.6 ENVIRONMENTAL IMPACTS

IMPACT AE-3: THE PROJECT IS LOCATED WITHIN AN URBAN AREA AND WOULD NOT SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF PUBLIC VIEWS OF THE SITE; AND WOULD NOT CONFLICT WITH APPLICABLE ZONING OR OTHER REGULATIONS GOVERNING SCENIC QUALITY.

Less than Significant Impact. Currently, the proposed Project site contains buildings with various architectural styles, heights, and massing. The proposed Project would result in a visual change of the site to a higher intensity development, consisting of adaptive office reuse of the Covina Bowl building, which would provide approximately 12,000 square feet of commercial/office space; and development of 16 new multi-family residential buildings that would be 3-stories (37 feet) in height with parking and open space areas.

In addition, buildout of the Project by the year 2040 may also include removal of the existing office space for the potential development of an equivalent 4,175 square-foot retail space or 11 multi-family residential units per the standards of Planning Area 2; and removal of the existing 31 residential apartments, restaurant,

and associated site improvements for development of 37,244 square feet of retail space or 52 multi-family residential units.

The Specific Plan includes development standards to regulate development within the Project site and any development within the Project site would be reviewed and approved by the City pursuant to these development standards to ensure consistency. The Specific Plan states that the proposed development, amenities, and improvements would be distinctive, and acknowledge the Covina Bowl Google architecture. For example, the existing 6-foot high block wall adjoining the existing multi-family residential units and restaurant (separating Planning Area 2 and Planning Area 4), would be enhanced to provide a unifying and cohesive design consistent with the overall character of the Project site.

In terms of visual quality, the design inspiration of the new construction would be taken from the features, materials, spaces, finishes, and construction techniques of the Covina Bowl to provide compatibility with the existing historic character of the building. The architecture of the new multi-residential buildings is proposed to reference, not mimic, the character defining features and materials with minimal detailing such as angled wing entry awnings, natural rock embellishment, and a complimentary but muted color palette. Open space areas on the site would feature architectural elements of the Covina Bowl building, such as incorporating A-frame paseo entry features and angled overhead trellises inspired by the folded plate canopy at the entry lobby of the Covina Bowl building.

As further detailed in Section 5.3, *Cultural Resources*, the proposed renovation of the Covina Bowl building would alter the mass of the building. However, the distinctive exterior of nearly the entire original façade and main front mass would be retained, restored, and repaired as needed. This portion of the building provides the majority of the character-defining architectural features that include the pyramid-shaped A-frame entry, folded plate canopy, and the 60-foot high neon sign. Also, the Bouquet Canyon Rock wall along the front would be retained through relocation or reuse to retain the distinctive rock material as a visible feature from W. San Bernardino Avenue. The non-historic north end addition of the building would be removed and reconstructed to be compatible with original design and other extant features, thereby increasing compatibility with the character of the historic building. Additionally, the original setback, landscaping, and L-shaped corner parking lot of the Covina Bowl building would be retained.

The increase in the number and height of buildings within Planning Area 2 would increase the overall density of the built environment on the site from W. Badillo Street, W. San Bernardino Road, and N. Rimsdale Avenue. However, the proposed architectural and landscaping treatments would reduce the visual mass and height of the new structures. Furthermore, the proposed residential buildings would be 37 feet in height, which would not exceed the approximately 40-foot entry pyramid. Thus, impacts related to the increase in height and density of the site would be less than significant.

As shown on Figure 3-8, *Conceptual Site Plan*, the boundaries of the site would be landscaped with ground covers, shrubs, and trees. Views of the Project site from W. Badillo Street, W. San Bernardino Road, and N. Rimsdale Avenue would be fronted by the new landscaping that would accent the proposed multi-family buildings, as shown on Figure 5.1-5. Additionally, the proposed buildings were designed to reduce the visual scale and mass by reinforcing the ground floor of the building and by providing varying architectural recesses and articulation of the second through third stories. Thus, a degradation of the visual character or quality of the site and its surroundings would not occur.



Source: William Hezmalhalch Architects, Inc. DBA WHA

Existing Building
(N.A.P.)

Badillo Street

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Regarding a potential conflict with applicable zoning and other regulations governing scenic quality, the Project includes General Plan Amendment and zone change that would change the existing General Plan and zoning designations of the site to Specific Plan (SP). The proposed Specific Plan includes specific design standards and guidelines for development within the site to provide a unifying and cohesive character and quality. With adherence to Specific Plan standards, which is verified by the City during the development permitting process, development would not conflict with any regulations related to scenic quality. Overall, impacts related to scenic quality would be less than significant.

IMPACT AE-4: THE PROJECT WOULD NOT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA.

Less than Significant Impact. The Project site is located within a developed urban area of the City of Covina, adjacent to highly used roadways. Existing sources of light in the vicinity include streetlights along W. Badillo Street, W. San Bernardino Road, and N. Rimsdale Avenue, parking lot lighting, building illumination, security lighting, landscape lighting, and lighting from building interiors that pass-through windows. The exterior lighting in the Project site includes exterior lighting throughout existing parking areas and lighting at building entrances.

The proposed development would include the provision of nighttime lighting for security purposes around all of the buildings and parking areas. Implementation of the proposed Project would result in a higher intensity development on the site than currently exists, which would contribute additional sources to the overall ambient nighttime lighting conditions. However, all outdoor lighting would be hooded, appropriately angled away from adjacent land uses, and would comply with the City's Municipal Code Section 17.28.430, which requires that lighting of the building, landscaped parking area or similar facilities shall be so hooded and erected so as to reflect away from adjoining properties. Because the Project site is within an urban area with various sources of existing nighttime lighting, and new development would be required to comply with the City's lighting regulations that would be verified during the development permitting process, the increase in light that would be generated by the Project would not adversely affect day or nighttime views in the area. Overall, lighting impacts would be less than significant.

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. Generally, darker or mirrored glass would have a higher visible light reflectance than clear glass. Buildings constructed of highly reflective materials from which the sun reflects at a low angle can cause adverse glare. However, the proposed Project does not include buildings that would use highly reflective surfaces, or include glass sided buildings. Although the proposed residential buildings would contain windows, the windows would be separated by stucco and architectural treatments, which would limit the potential of glare. Also, as described previously, onsite lighting would be angled down and shielded, which would avoid the potential on onsite lighting to generate glare. Therefore, the new development implemented by the proposed Project would not generate substantial sources of glare, and impacts would be less than significant.

5.1.7 CUMULATIVE IMPACTS

Visual Character and Site Quality

The cumulative aesthetics study area for the proposed Project is the viewshed from public areas that can view the Project site and locations that can be viewed from the site. As shown on Figure 5-1, there are no cumulative projects located adjacent or within the viewshed of the proposed Project. Thus, the view changes generated by the proposed Project would not combine with any other cumulative projects. Although not in

the same viewshed, a large portion of the cumulative projects consist of multi-family residential, commercial, and office development. These related projects are similar and consistent to the development that would be implemented by the proposed Project; and thus, would provide for generally the same type of visual character, which would not result in a degradation of views. Therefore, implementation of the proposed Project, when combined with the past, present, and reasonably foreseeable cumulative projects, would not result in a cumulatively considerable degradation to the existing visual character or quality of the environment. As a result, cumulative impacts would be less than significant.

Light and Glare

The cumulative study area for light and glare are areas immediately adjacent to the Project site that could receive light or glare from development of the proposed Project or could generate daytime glare or nighttime lighting that would be visible within the site and could combine with lighting from the development within the site. As described previously, there are no cumulative projects located adjacent or within the viewshed of the proposed Project. Thus, new lighting from the Project site would not combine with lighting from nearby projects. In addition, Municipal Code Section 17.28.430, which requires that lighting be so hooded and reflected away from off-site areas, which would reduce overall lighting within the City. Therefore, cumulative impacts related to light and glare would be less than significant.

5.1.8 EXISTING REGULATIONS, STANDARD CONDITIONS, AND PLANS, PROGRAMS, OR POLICIES

- City of Covina Municipal Code
- City of Covina General Plan Land Use Element
- City of Covina Citywide Design Guidelines
 - Section 2, Section 3, Section 4, Section 5, Section 6, Section 7

5.1.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and the proposed Project's design criteria, Impacts AE-3 through AE-4 would be less than significant.

5.1.10 MITIGATION MEASURES

No mitigation measures are required.

5.1.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Existing regulatory programs would reduce potential impacts associated with aesthetics to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to aesthetics would occur.

REFERENCES

Caltrans California Scenic Highway Mapping System (Caltrans 2017). Accessed:
<https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a>

City of Covina Citywide Design Guidelines. Accessed at:

https://covina.ca.gov/sites/default/files/fileattachments/planning_commission/page/5172/design_guidelines.pdf

City of Covina Land Use Element. Accessed at:

https://covina.ca.gov/sites/default/files/fileattachments/planning_commission/page/1073/land_use.pdf

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5.2 Air Quality

5.2.1 INTRODUCTION

This section provides an overview of the existing air quality within the City of Covina and surrounding region, a summary of applicable regulations, and analysis of potential short-term and long-term air quality impacts from implementation of the proposed Project. Mitigation measures are recommended as necessary to reduce potentially significant air quality impacts. This section includes data from the Air Quality Impact Analysis (AQ 2020), Prepared by Urban Crossroads, included as Appendix B.

5.2.2 REGULATORY SETTING

United States Environmental Protection Agency

Criteria Air Pollutants

At the federal level, the United States Environmental Protection Agency (USEPA) has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA were made by Congress in 1990. The CAA requires the USEPA to establish National Ambient Air Quality Standards (NAAQS). The USEPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead. Table 5.2-1 shows the NAAQS for these pollutants.

The CAA also requires each state to prepare an air quality control plan, referred to as a state implementation plan (SIP). The CAA Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. The USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and to determine whether implementing the SIPs will achieve air quality goals. If the USEPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary sources of air pollution in the air basin.

The USEPA also has regulatory and enforcement jurisdiction over emission sources beyond state waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The USEPA's primary role at the state level is to oversee state air quality programs. The USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the CAAA directed the USEPA to promulgate national emissions standards for HAPs (NESHAP). Major sources are defined as stationary sources with potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources. The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the USEPA developed technology-based emission standards designed to produce the maximum emission reduction achievable.

These standards are generally referred to as requiring maximum achievable control technology (MACT). For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the USEPA promulgated health-risk-based emissions standards when deemed necessary, to address risks remaining after implementation of the technology-based NESHAP standards.

Table 5.2-1: Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when ROG and NO _x react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial / industrial mobile equipment.
	8 hours	0.07 ppm	0.075 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO₂)	1 hour	0.18 ppm	0.100 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Arithmetic Mean	0.030 ppm	0.053 ppm		
Sulfur Dioxide (SO₂)	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.50 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Arithmetic Mean	---	0.03 ppm		
Respirable Particulate Matter (PM₁₀)	24 hours	50 µg/m ³	150 µg/m ³	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	---		
Fine Particulate Matter (PM_{2.5})	24 hours	---	35 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NO _x , sulfur oxides, and organics.
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³		
Lead (Pb)	30 Day Average	1.5 µg/m ³	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m ³		
	Rolling 3-Month Average	---	0.15 µg/m ³		
Hydrogen Sulfide	1 hour	0.03 ppm	No National Standard	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal power plants, petroleum production and refining
Sulfates (SO₄)	24 hour	25 µg/m ³	No National Standard	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	No National Standard	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See PM _{2.5} .

Note: ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter.

The CAAA also required the USEPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, Section 219 required the use of reformulated gasoline in selected areas with the most severe ozone nonattainment conditions to further reduce mobile-source emissions.

California Air Resources Board

Criteria Air Pollutants

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO₄, visibility, hydrogen sulfide (H₂S), and vinyl chloride (C₂H₃Cl). However, at this time, H₂S and C₂H₃Cl are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS.

Local air quality management districts, such as the SCAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS.

Serious non-attainment areas are required to prepare AQMPs that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g. motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;

Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROG_s, NO_x, CO and PM₁₀. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code (CalGreen) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020.

The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrade requirements.

The 2019 CALGreen standards that are applicable to the Project include, but are not limited to, the following:

- Short-term bicycle parking. Provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack.
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.
- Designated parking for clean air vehicles. Provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Title 24 Part 6 Table 5.106.5.2.
- Electric vehicle charging stations. Facilitate the future installation of electric vehicle supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Title 24 Part 6 Table 5.106.8.
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste.
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush. The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush.
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi. When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi.
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi. Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi. Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute. Metering faucets shall not deliver more than 0.20 gallons per cycle. Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle.
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent.
- Water meters. Separate submeters or metering devices shall be installed for new buildings or where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day.

- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit.
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements.

The 2019 CalGreen Building Standards Code has been adopted by reference in the City's Municipal Code in Section 14.02.010(N).

SCAQMD

Criteria Air Pollutants

South Coast Air Quality Management District (SCAQMD) attains and maintains air quality conditions in the Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the CAA, CAAA, and CCAA. Air quality plans applicable to the proposed Project are discussed below.

Air Quality Management Plan

SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the air quality management plan (AQMP), which addresses federal and state CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In March 2017 AQMD finalized the 2016 AQMP, which provides integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. The 2016 AQMP incorporates scientific and technological information and planning assumptions, including SCAG's 2016 RTP/SCS and updated emission inventory methodologies for various source categories.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the proposed Project include the following:

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles,

restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a, off-site nuisance. Applicable Rule 403 dust suppression (and PM₁₀ generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 431.2 – Sulfur Content of Liquid Fuels. This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.

Rule 445 – Wood Burning. This rule prohibits permanently installed wood burning devices into any new development. A wood burning device means any fireplace, wood burning heater, or pellet-fueled wood heater, or any similarly enclosed, permanently installed, indoor or outdoor device burning any solid fuel for aesthetic or space-heating purposes, which has a heat input of less than one million British thermal units per hour.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule. A list of low/no-VOC paints is provided at the following SCAQMD website: www.aqmd.gov/prdas/brochures/paintguide.html. All paints will be applied using either high volume low-pressure spray equipment or by hand application.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1186 – Emissions from Paved and Unpaved Roads. The purpose of this rule is to reduce the amount of particulate matter entrained in the ambient air as a result of vehicular travel and requires that any owner or operator of a paved public road on which there is visible roadway accumulations shall begin removal of such material through street cleaning within 72 hours of any notification of the accumulation and shall completely remove such material as soon as feasible.

Rule 1186.1 - Less-Polluting Sweepers. This rule requires public and private sweeper fleet operators to acquire alternative-fuel or otherwise less-polluting sweepers when purchasing or leasing these vehicles for sweeping operations.

City of Covina General Plan

The General Plan Natural Resources and Open Space Element includes goals, policies, and objectives that support the reduction of air pollution. The Natural Resources and Open Space Element goals, objectives, and policies relevant to the proposed Project include:

Policy 1.o: Comply with applicable portions of Federal, State, regional, and County plans and programs pertaining to air pollution mitigation/air quality enhancement by following, in a manner that recognizes local needs, issues, views, and policy and financial constraints, various vehicular emissions-reducing and traffic congestion-reducing land use and transportation control and energy conservation measures, proposals, and policies outlined in the Land Use and Circulation Elements, to the greatest extent feasible and practical.

Policy 1.p: Encourage and support the use of mass transit, whenever possible, and work with transit operators to provide the best, most efficient service for local residents and businesses to reduce vehicular travel and air pollution.

Policy 1.s: Separate sensitive areas and uses (e.g., parks, schools, child care centers, and nursing homes) from significant sources of air pollution, to the greatest extent possible.

Policy 1.t: Preclude the development of land uses and land use practices that would contribute significantly to air quality degradation.

Policy 1.u: Encourage and, where necessary, require the incorporation of energy conservation features in the design of all new and significantly expanded/remodeled private and public developments and encourage the installation of conservation devices in existing developments to increase energy efficiency and decrease pollution emissions from off-site electrical power plants and on-site natural gas use.

City of Covina Municipal Code

The City's Municipal Code, Title 9, Public Peace, Morals, and Safety, Chapter 9.42, environmental disturbances, declares it is the policy of the City to use its police power to prevent persons living or working on one property from being disturbed due to annoying and unnecessary odors, smoke, and other disturbances.

Section 9.42.020, Sources of Environmental Disturbances, sets forth that:

- No operation or activity of odorous gases or other odorous matter in such quantities as to be dangerous, injurious, noxious, or otherwise objectionable, which is detectable with or without the aid of instruments, shall be permitted at or beyond the lot line of the property generating the odorous gases or matter (Section 9.42.020 A.).
- No operation or activity is permitted to have operations that emit excessive smoke, fumes, or dust that exceeds the requirements or levels specified by the SCAQMD (Section 9.42.020 C.).

5.2.3 ENVIRONMENTAL SETTING

Climate and Meteorology

The City of Covina is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the SCAQMD. The Project site is located within the SCAB, a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Los Angeles County portion of the Mojave Desert Air Basin is bounded by the San Gabriel Mountains to the south and west, the Los Angeles / Kern County border to the north, and the Los Angeles / San Bernardino County border to the east. The Riverside County portion of the Salton Sea Air Basin is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine

layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

Criteria Air Pollutants

The CARB and the USEPA currently focus on the following air pollutants as indicators of ambient air quality: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀), fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}), and lead. These pollutants are referred to as “criteria air pollutants” because they are the most prevalent air pollutants known to be injurious to human health. Extensive health-effects criteria documents regarding the effects of these pollutants on human health and welfare have been prepared over the years.¹ Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal CAA. California has generally adopted more stringent ambient air quality standards for the criteria air pollutants (CAAQS or state standards) and has adopted air quality standards for some pollutants for which there is no corresponding national standard (NAAQS), such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

In addition, the City’s General Plan Natural Resources and Open Space Element identifies local and regional industries, commercial businesses, and motor vehicles as the primary source of the City’s pollutant emissions.

Ozone. Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NO_x). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed, it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth (“rainout”), or absorption by water molecules in clouds that later fall to earth with rain (“washout”). Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide. CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide. NO₂ is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO₂. The combined emissions of NO and NO₂ are referred to as NO_x, which are reported as equivalent NO₂. Aside from its contribution to ozone formation,

¹ Additional sources of information on the health effects of criteria pollutants can be found at CARB and USEPA’s websites at <http://www.arb.ca.gov/research/health/health.htm> and <http://www.epa.gov/air/airpollutants.html>, respectively.

NO₂ can increase the risk of acute and chronic respiratory disease and reduce visibility. NO₂ may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

Sulfur Dioxide. SO₂ is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfur trioxide (SO₃). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO₂ aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. Long-term SO₂ exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

Particulate Matter. PM₁₀ and PM_{2.5} consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis and respiratory illnesses in children. Particulate matter can also damage materials and reduce visibility. One common source of PM_{2.5} is diesel exhaust emissions.

PM₁₀ consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO₂ and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM₁₀ and PM_{2.5} are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. PM_{2.5} can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROG_s, ammonia (NH₃), NO_x, and SO_x.

Lead. Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles. Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates.

Existing Conditions

The SCAQMD has designated general forecast areas and air monitoring areas, referred to as Source Receptor Areas (SRAs), throughout the district in order to provide Southern California residents about the air quality conditions. The Project site is located within SRA 9. Within SRA 9, the East San Gabriel Valley 1 monitoring station, located 3.45 miles northwest, is the nearest station that provides air quality statistics for O₃, CO, NO₂, PM₁₀, and PM_{2.5}.

The most recent three years of data available is shown on Table 5.2-2, which identifies the number of days ambient air quality standards were exceeded for the study area, and is considered to be representative of the local air quality at the Project site. Data for O₃, CO, NO₂, PM₁₀, and PM_{2.5} for 2016 through 2018

were obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO₂ has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO₂ concentrations.

Table 5.2-2: Air Quality Monitoring Summary 2016-2018

Pollutant	Standard	Year		
		2016	2017	2018
O ₃				
Maximum Federal 1-Hour Concentration (ppm)		0.146	0.152	0.139
Maximum Federal 8-Hour Concentration (ppm)		0.106	0.114	0.099
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	0	8	4
Number of Days Exceeding State 8-Hour Standard	> 0.070 ppm	9	2	2
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.3	1.8	1.4
Maximum Federal 8-Hour Concentration	> 20 ppm	1.2	0.9	1.0
NO ₂				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.074	0.066	0.071
Annual Average		16.6	15.8	14.9
PM ₁₀				
Maximum 24-hr Concentration (µg/m ³)	> 150 µg/m ³	101	74	83
Annual Arithmetic Mean (µg/m ³)		37.1	33.7	31.4
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m ³	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m ³	12	6	10
PM _{2.5}				
Maximum 24-hr Concentration (µg/m ³)	> 35 µg/m ³	32.17	24.90	30.20
Annual Arithmetic Mean (µg/m ³)	> 12 µg/m ³	10.15	10.42	10.35
Samples Exceeding Federal 24-hr Standard	> 35 µg/m ³	0	0	0

Source: Urban Crossroads, 2020.

Both CARB and the USEPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified on the basis of available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. In addition, California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

In 2018, the federal and state ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for O₃ and PM₁₀ at most monitoring locations. No areas of the SCAB exceeded federal or state standards for NO₂, or CO. See Table 5.2-3, for attainment designations for the SCAB.

Table 5.2-3: Attainment Status of Criteria Pollutants in the SCAB

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb ²	Attainment	Unclassifiable/Attainment

Source: Urban Crossroads, 2020.

Sensitive Land Uses

Some people are more affected by air pollution than others. Sensitive air quality receptors include specific subsets of the general population that are susceptible to poor air quality and the potential adverse health effects associated with poor air quality. Both CARB and the SCAQMD consider residences, schools, parks and playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes to be sensitive air quality land uses and receptors.

The Project site includes a 31-unit residential apartment complex, which are sensitive receptors that are located approximately 15-feet from the proposed construction area. In addition, the closest off-site sensitive receptor is an existing residence at 1119 W. Badillo Street, approximately 12 feet west of the Project site.

5.2.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan;
- AQ-2 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;
- AQ-3 Expose sensitive receptors to substantial pollutant concentrations; or
- AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The Initial Study established that the Project would result in less than significant impacts related to Threshold AQ-4; no further assessment of this impact is required in this EIR.

Regional Thresholds

The SCAQMD's regional significance thresholds are listed in Table 5.2-4. The SCAQMD's CEQA air quality methodology provides that any projects that result in daily emissions that exceed any of these thresholds would have both an individually (project-level) and cumulatively significant air quality impact.

² The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

Table 5.2-4: SCAQMD Regional Air Quality Thresholds

Pollutant	Construction	Operations
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

Source: Urban Crossroads, 2020.

Localized Significance Thresholds

SCAQMD has also developed localized significance thresholds (LSTs) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of that pollutant for each of the 38 source receptor areas (SRAs) in the Basin. The localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by SCAQMD, were developed for use on projects that are less than or equal to 5-acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}.

The construction and operational LSTs for a 5-acre site in SRA 9 (East San Gabriel Valley), the SRA in which the City of Covina is located, are shown in Table 5.2-5 below.

Table 5.2-5: SCAQMD Localized Significance Construction Thresholds

Pollutant	Threshold
NO _x	203 lbs/day
CO	1,105 lbs/day
PM ₁₀	14 lbs/day
PM _{2.5}	8 lbs/day

Source: Urban Crossroads, 2020.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels as well as implementation of control technology on industrial facilities, CO concentrations in the South Coast Air Basin and the state have steadily declined. The analysis of CO hotspots compares the volume of traffic that has the potential to generate a CO hotspot and the volume of traffic with implementation of the proposed Specific Plan Project.

5.2.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Specific Plan Project. Air pollutant emissions associated with the proposed Project would result from construction equipment usage and from construction-related traffic. Additionally,

emissions would be generated from operations of the future commercial/office and residential uses and from traffic generated by the new uses. The net increase in emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to the applicable thresholds of significance recommended by SCAQMD.

AQMP Consistency

SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed General Plan land use and zoning designation changes) would be consistent or in conflict with the AQMP.

Consistency Criterion No. 1 refers to the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). An impact would occur if the long-term emissions associated with the proposed Specific Plan Project would exceed SCAQMD's regional significance thresholds for construction-source or operation-source emissions.

Consistency Criterion No. 2 refers to the growth forecasts and associated assumptions included in the 2016 AQMP. The 2016 AQMP was designed to achieve attainment for all criteria air pollutants within the Basin while still accommodating growth in the region. Projects that are consistent with the AQMP growth assumptions would not interfere with attainment of air quality standards, because this growth is included in the projections used to formulate the AQMP. Therefore, if the growth under the Specific Plan Project is consistent with the regional population, housing, and employment forecasts identified by SCAG in the RTP/SCS, plan implementation would be consistent with the AQMP, even if emissions could potentially exceed the SCAQMD's recommended daily emissions thresholds.

Construction

Construction-generated emissions of criteria air pollutants and ozone precursors from buildout of the proposed Project is assessed in accordance with methods recommended by SCAQMD. The proposed Specific Plan Project's regional emissions were modeled using the California Emissions Estimator Model (CalEEMod), as recommended by SCAQMD. CalEEMod was used to determine whether construction-related emissions of criteria air pollutants would exceed applicable regional thresholds and where mitigation would be required. Modeling was based on buildout of Planning Areas 1 and 2, and the construction-generated emissions were compared with applicable SCAQMD regional thresholds to determine significance.

In addition, to determine whether or not construction activities associated with buildout of Planning Areas 1 and 2 would create significant adverse localized air quality impacts on nearby sensitive receptors, the worst-case daily emissions contribution from buildout of Planning Areas 1 and 2 was compared to SCAQMD's LSTs that are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts. The total combustion, mobile, and fugitive dust emissions associated with buildout of Planning Areas 1 and 2 were evaluated against SCAQMD's LSTs as appropriate for each activity.

Operations

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors from Planning Areas 1 through 4 were also quantified using the CalEEMod computer model. During long-term operation of the Project, emissions would be expected from area-source emissions, energy source emissions, mobile source emission, and on-site equipment emissions. Area-source emissions were modeled according to the size and type of the land uses proposed. Mass mobile-source emissions were modeled based on the increase in daily vehicle trips that would result from buildout of the Specific Plan. Trip generation rates were available from

the Traffic Impact Analysis prepared for the Project (see Appendix L of this EIR). Predicted long-term operational emissions were compared with applicable SCAQMD thresholds for determination of significance.

5.2.6 ENVIRONMENTAL IMPACTS

IMPACT AQ-1: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN.

Less than Significant Impact. The SCAQMD's 2016 AQMP is the applicable air quality plan for the proposed Project. As described previously, an impact related to Consistency Criterion No. 1 would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds for construction-source or operation-source emissions.

As detailed below in Impact AQ-2, neither construction nor operation of the proposed Project would exceed applicable regional significance thresholds or LST thresholds. Therefore, buildout of the proposed Project would be consistent with Consistency Criterion No. 1, and impacts would be less than significant.

As described previously, an impact related to Consistency Criterion No. 2 would occur if the Project is inconsistent with the regional population, housing, and employment forecasts identified by SCAG in the RTP/SCS. Buildout of Planning Areas 1 and 2 would result in 132 multi-family residential units and 12,000 square feet of commercial/office space. According to the City's General Plan population estimate³, the average number of persons per household in the City of Covina is 2.745. Using the 2.745 person per unit multiplier, the new residences would result in approximately 363 new residents. In addition, the 12,000 square feet of commercial/office space would result in 26 additional employees⁴. The 363 residents at full occupancy would constitute a 0.74 percent increase over the existing (2019) City of Covina population of 48,876. In addition, the 132 new multi-family residences would constitute a 0.79 percent increase in the number of existing residential units in the City (16,708).

In addition, buildout of Planning Areas 3 and 4 by 2040 would result in development of 4,175 square-feet of retail space or 11 multi-family residential units in Planning Area 3 and 37,244 square feet of retail space or 52 multi-family residential units. If all of Planning Areas 3 and 4 were redeveloped with multi-family residences, approximately 173 residents would result. Conversely, if all of Planning Areas 3 and 4 were redeveloped with retail uses, approximately 87 employees would result.

The 536 residents that could occur at full occupancy of all Planning Areas with multi-family residential by 2040 would constitute 19 percent of the SCAG's anticipated population growth in the City between 2020 and 2040. In addition, the 195 new residential units under this scenario would constitute a 21.7 percent of the SCAG anticipated household growth in the City between 2020 and 2040.

The RTP/SCS projections show the City of Covina is anticipated a population increase of 6.6 percent (for a population of 51,600) and a housing increase of 13.8 percent by 2040 (for a total of 17,200 households). Thus, the percentage of new residents (1.04%) and residential units (1.10%) developed from buildout of the proposed Project would be within the RTP/SCS projected growth.

³ City of Covina General Plan, 2000

⁴ Based upon the U.S. Green Building Council's (2008) average SF/employee: Commercial is 475 square feet (SF)/12,000 SF/employee = 26 employees.

In addition, the Project's increase of 26 employees from Planning Area 1 and the potential 87 employees from Planning Areas 3 and 4 would be 5.1 percent of the SCAG anticipated increase in the number of employees between 2020 and 2040 (2,200). Thus, buildout of the proposed Project is within the growth anticipated in the 2016-2040 RTP/SCS. Therefore, buildout of the proposed Project would be consistent with Consistency Criterion No. 1, and impacts would be less than significant.

IMPACT AQ-2: THE PROJECT WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF A CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS IN NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD.

Construction

Less than Significant Impact with Mitigation Incorporated. Construction activities associated with buildout of the proposed Specific Plan Project would result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Pollutant emissions associated with construction would be generated from the following: (1) demolition, grading, and excavation; (2) construction workers traveling to and from the Project site; (3) delivery and hauling of construction supplies to, and debris and soils export from, the Project site; (4) fuel combustion by on-site construction equipment; (5) building construction; application of architectural coatings; and paving. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants.

Construction emissions are short-term and temporary, lasting approximately 15-months for the proposed development within Planning Areas 1 and 2. The maximum daily construction emissions were estimated using CalEEMod; and the modeling includes compliance with SCAQMD Rules 403, 431.2, 1113, and 1186 / 1186.1 (described above), which are requirements that would reduce air contaminants during construction. Table 5.2-6 provides the maximum daily emissions of criteria air pollutants from construction of the proposed development within Planning Areas 1 and 2 and shows that SCAQMD thresholds would not be exceeded. Thus, impacts related to construction emissions from the proposed development within Planning Areas 1 and 2 would be less than significant with implementation of required SCAQMD Rules.

Table 5.2-6: Maximum Peak Construction Emissions for Planning Areas 1 and 2

Year	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2023	3.90	41.92	21.60	0.06	11.07	5.77
2024	65.46	26.03	21.11	0.06	2.40	1.32
Winter						
2023	3.91	41.93	21.30	0.06	11.07	5.77
2024	65.47	26.05	20.83	0.06	2.40	1.32
Maximum Daily Emissions	65.47	41.93	21.60	0.06	11.07	5.77
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Urban Crossroads, 2020.

There is no specific development is proposed at this time for Planning Areas 3 and 4. However, the maximum potential buildout of Planning Area 3 includes removal of the existing office building and development of 4,175 square-feet of retail space or 11 multi-family residential units; and the maximum potential buildout of Planning Area 4 includes removal of the existing 31 apartment units, restaurant, and associated site improvements and development of 37,244 square feet of retail space or 52 multi-family residential units. The maximum developable area within Planning Areas 3 and 4 totals 41,419 square feet of retail or 63

multi-family units, which is much less than the 132 multi-family residential units and the 12,000 square feet of commercial/office uses that would be constructed for Planning Areas 1 and 2. Therefore, the maximum peak construction emissions for build out of Planning Areas 3 and 4 would also not exceed the SCAQMD Regional Thresholds. However, specific construction details are not available. Therefore, to ensure that future construction in Planning Areas 3 and 4 would not result in emissions that could exceed SCAQMD thresholds, Mitigation Measure AQ-1 has been included, which requires construction related air quality modeling be prepared, and mitigation included if necessary, to reduce emissions below thresholds prior to construction permit approval for development within Planning Areas 3 and 4.

Operation

Less Than Significant Impact. Buildout of the proposed Project would result in long-term emissions of criteria air pollutants from area sources generated by the proposed commercial/office and residential uses, such as vehicular emissions, natural gas consumption, applications of architectural coatings, the use of consumer products, and landscape maintenance equipment. The emissions from the proposed Project are primarily from vehicle trips.

As described in Section 5.14, *Transportation*, operation of Planning Areas 1 and 2 is anticipated to generate 1,081 daily trips, with 133 a.m. peak hour trips and 97 p.m. peak hour trips. The operational emissions from Planning Areas 1 and 2 are provided on Table 5.2-7. As shown, emissions from operation of Planning Areas 1 and 2 would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact related to operation of Planning Areas 1 and 2.

Table 5.2-7: Summary of Maximum Operational Emissions for Planning Areas 1 and 2

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	5.12	2.32	11.82	0.01	0.24	0.24
Energy Source	0.05	0.40	0.20	2.52E-03	0.03	0.03
Mobile	2.53	6.56	26.45	0.08	7.63	2.08
Total Maximum Daily Emissions	7.70	9.27	38.47	0.10	7.90	2.35
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Operational Activities – Winter Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	5.12	2.32	11.82	0.01	0.24	0.24
Energy Source	0.05	0.40	0.20	2.52E-03	0.03	0.03
Mobile	2.60	6.80	25.34	0.08	7.63	2.08
Total Maximum Daily Emissions	7.77	9.52	37.36	0.09	7.90	2.35
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Urban Crossroads, 2020.

As detailed in the Traffic Impact Study (Appendix L) operation of Planning Areas 3 is anticipated to generate a maximum of 118 daily trips, and operation of Planning Areas 4 is anticipated to generate a maximum of 716 daily trips. In addition, operation of the new uses would generate emissions from area and energy sources. The maximum potential operational emissions from Planning Areas 3 and 4 are provided on Table 5.2-8. In addition, Table 5.2-8 provides the total emissions from operation of all of the Planning Areas at buildout. As shown, operational emissions at maximum potential buildout of the Project site would not exceed SCAQMD thresholds. Therefore, impacts would be less than significant.

Table 5.2-8: Summary of Maximum Operational Emissions for All Planning Areas

	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ¹⁰	PM ^{2.5}
PA 1 and 2 Total Maximum Daily Emissions	7.77	9.52	38.47	0.10	7.90	2.35
PA 3 Total Maximum Net Daily Emissions	0.35	0.69	2.38	0.01	0.61	0.17
PA 4 Total Maximum Net Daily Emissions	1.78	3.74	14.20	0.04	4.69	1.22
Combined Total Maximum Net Daily Emissions	9.90	13.95	55.05	0.15	13.2	3.74
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Urban Crossroads, 2020.

IMPACT AQ-3: THE PROJECT WOULD NOT RESULT IN EXPOSURE OF SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS.

Localized Construction Emissions

Less than Significant Impact with Mitigation Incorporated. As described previously, the daily construction emissions generated on-site by buildout of the proposed Project are compared to SCAQMD's LSTs to determine whether the emissions would cause or contribute to adverse localized air quality impacts. As discussed previously, the closest sensitive receptor to the proposed construction is the existing residence that is approximately 12 feet west of the Project site at 1119 W. Badillo Street. The SCAQMD LST Methodology states that projects closer than 25 meters from the nearest sensitive receptor should use the LSTs for receptors located at 25 meters. Therefore, the LSTs for a receptor distance of 25 meters was used to evaluate LST emissions. Table 5.2-9 shows that emissions during the peak construction activity would not exceed any of the SCAQMD's localized significance thresholds. Therefore, LST construction impacts would be less than significant.

Table 5.2-9: Summary of Localized Construction Emissions for Planning Areas 1 and 2

	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Demolition Emissions				
Maximum Daily Emissions	21.48	19.64	1.76	1.04
SCAQMD Localized Threshold	203	1,105	14	8
Threshold Exceeded?	No	No	No	No
On-Site Site Preparation Emissions				
Maximum Daily Emissions	41.88	18.29	10.87	5.71
SCAQMD Localized Threshold	203	1,105	14	8
Threshold Exceeded?	No	No	No	No
On-Site Grading Emissions				
Maximum Daily Emissions	41.88	18.29	10.87	5.71
SCAQMD Localized Threshold	203	1,105	14	8
Threshold Exceeded?	No	No	No	No

Source: Urban Crossroads, 2020.

As described previously, there is no specific development is proposed at this time for Planning Areas 3 and 4. However, the maximum potential buildout of Planning Areas 3 and 4 totals 41,419 square feet of retail or 63 multi-family units, which is much less than the 132 multi-family residential units and the 12,000 square feet of commercial/office uses that would be constructed within Planning Areas 1 and 2. Therefore, the

construction emissions for build out of Planning Areas 3 and 4 would also not exceed the SCAQMD's localized significance thresholds. However, specific construction details are not available. Therefore, to ensure that future construction in Planning Areas 3 and 4 would not result in emissions that could exceed SCAQMD thresholds, Mitigation Measure AQ-1 has been included, which requires construction related air quality modeling be prepared, and mitigation included if necessary, to reduce emissions below thresholds prior to construction permit approval for development within Planning Areas 3 and 4.

Localized Operation Emissions

According to SCAQMD LST methodology, LSTs apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Specific Plan Project does not include such uses. Thus, potential operational LST impacts would not occur.

CO Hotspots

Less than Significant. An adverse CO concentration, known as a “hot spot”, would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. In 2003, the SCAQMD estimated that a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a CO hot spot.

As detailed in Section 5.13, *Transportation*, in Table 5.13-5, the proposed Project would generate 133 new vehicle trips (60 inbound trips and 73 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project is expected to generate 97 new vehicle trips (50 inbound trips and 47 outbound trips). Over a 24-hour period, the Project is forecast to generate approximately 1,081 new daily trip ends during a typical weekday. Thus, buildout of the proposed Project would not result in an increase in traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix and would not generate a CO hot spot. Therefore, impacts related to CO “hot spots” from operation of the proposed Project would be less than significant.

5.2.7 CUMULATIVE IMPACTS

As described previously, per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As discussed above in the response to Threshold AQ-1, the proposed Project meets both the first and second criterion for determining consistency with the 2016 SCAQMD AQMP. Thus, the Project would not conflict with the 2016 AQMP, as identified in the response to Threshold AQ-1 and would also not result in a cumulatively considerable impact. Also, as previously shown in Tables 5.2-6 through 5.2.8 construction and operational activities related to buildout of the proposed Project would not exceed any of the applicable SCAQMD thresholds. Thus, emissions would be less-than-cumulatively considerable.

5.2.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

The following state regulation would reduce potential impacts related to air quality:

- CalGreen Building Standards Code as included in the City's Municipal Code in Section 14.02.010(N).

In addition, the following Plans, Programs, and Policies (PPP) are SCAQMD Rules would reduce the potential for impacts to occur during implementation of the proposed Project will be included in the Project's mitigation monitoring and reporting program (MMRP):

PPP AQ-1: Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of Rule 403:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.

PPP AQ-2: Rule 1113. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 1113. The Project shall only use "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113.

PPP AQ-3: Rule 445. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.

5.2.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts AQ-2 and AQ-3 would be **potentially significant**.

Upon implementation of regulatory requirements, Impacts AQ-1 would be less than significant.

5.2.10 MITIGATION MEASURES

Mitigation Measure AQ-1: Prior to issuance of construction permits for development within Planning Area 3 or Planning Area 4 development specific construction related air quality modeling shall be prepared using the latest available CalEEMod model, or other analytical method that is consistent with SCAQMD guidance and be submitted to the City. The results of the construction-related air quality impacts analysis shall identify the emissions generated by the construction activity in comparison to the SCAQMD applicable thresholds. To address potential localized impacts, the air quality analysis shall incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined pursuant to SCAQMD criteria. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce emissions to below thresholds.

5.2.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

For Impacts AQ-2 and AQ-3, Mitigation Measure AQ-1 would reduce impacts to a less than significant level.

Impacts related Impact AQ-1 would be less than significant.

No significant unavoidable adverse impacts related to air quality would occur.

REFERENCES

Air Quality Impact Analysis. Prepared by Urban Crossroads. Appendix B.

SCAQMD Historical Data by Year for 2015, 2016, and 2017. Accessed: <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year>.

SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction Accessed: https://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf

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5.3 Cultural Resources

5.3.1 INTRODUCTION

This section addresses potential environmental effects of the proposed Project related to cultural resources, which include historic and archaeological resources. Information within this section includes data from the Cultural Resources Survey prepared by JM Research & Consulting (JMRC) (CUL 2020), which is provided as Appendix G.

Definitions

- **Archaeological resources** include any material remains of human life or activities that are at least 100 years of age, and that are of scientific interest. A unique or significant archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Cultural resources** are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to the California Environmental Quality Act (CEQA).
- **Historic building or site** is one that is noteworthy for its significance in local, state, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.
- **Historic context** refers to the broad patterns of historical development in a community or its region that is represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.
- **Historic integrity** is defined as “the ability of a property to convey its significance.”
- **Historical resources** are defined as “a resource listed or eligible for listing on the California Register of Historical Resources” (CRHR) (Public Resources Code, Section 5024.1; 14 CCR 15064.5). Under CEQA Guidelines Section 15064.5(a), the term “historical resources” includes the following:
 - (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (Public Resources Code, Section 5024.1).
 - (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
 - (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's

determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1) including the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 - (B) Is associated with the lives of persons important in California’s past;
 - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

5.3.2 REGULATORY SETTING

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria per 36 Code of Federal Regulations Part 60:

- a) Properties that are associated with events that have made a significant contribution to the broad patterns of our history;
- b) Properties that are associated with the lives of persons significant in our past;
- c) Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic “integrity,” which is “the ability of a property to convey its significance.” The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register.

Properties listed in or eligible for listing in the NRHP are also eligible for listing in the California Register of Historic Resources (CRHR), and as such, are considered historical resources for CEQA purposes.

California Register of Historical Resources

Eligibility for inclusion in the CRHR is determined by applying the following criteria:

- 1) It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- 2) It is associated with the lives of persons important in California's past;
- 3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value; or
- 4) It has yielded or is likely to yield information important in prehistory or history. The Register includes properties which are listed or have been formally determined to be eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest (PRC §5024.1).

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). The California Register also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

These regulations relate to unexpected discoveries of human remains at development sites. Health and Safety Code Section 7050.5 requires excavation or disturbance in the vicinity of human remains to cease until the coroner has reviewed the remains. If the remains are determined to be likely of Native American origin, the coroner must contact the Native American Heritage Commission. Public Resources Code Section 5097.98 provides guidance on the appropriate handling of Native American remains.

City of Covina General Plan

The Land Use Element of the City of Covina General Plan includes the following policies related to historic and archaeological resources:

Policy 2.1.17: Identify and encourage the retention and preservation of significant architectural, historical, and/or cultural resources.

Policy 3.14: The City of Covina shall preserve residential districts and buildings in the community that are deemed architecturally and/or historically significant.

City of Covina Municipal Code

The City of Covina Municipal Code (CMC) Section 17.81, Historic Preservation, states that an individual resource may be locally designated as a Landmark or Structure of Merit if it meets one or more of the following criteria:

1. It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history; or

2. It is identified with persons or events significant in local, state, or national history; or
3. It represents the work of a notable builder, designer, or architect; or
4. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
5. It contributes to the significance of an historic area being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development; or
6. It is one of the few remaining examples in the city of Covina, region, state, or nation possessing distinguishing characteristics of an architectural or historic type or specimen (CMC §17.81.050(A)).

5.3.3 ENVIRONMENTAL SETTING

Historic

Development in the Project site began in the late-19th century with the establishment of the citrus industry in Covina. The Project site consisted of a citrus grove until the late-1950s and early-1960s when commercial and residential uses were developed. Two single-family residences, now the Unity Church of the Foothills and the vacant day care center (in Planning Area 2), were the first to be constructed within the Project site in late 1953. The Covina Bowl building was developed in 1955 (in Planning Area 1). Then the small office (in Planning Area 3) was added in 1963.

Covina Bowl Building. The Cultural Resources Survey describes that the Covina Bowl building, which opened in 1956 (shown in Figure 5.3-1), contributed to the post-WWII suburbanization of Covina that was blanketed with citrus groves. Although modifications to the site have occurred since 1956, the Covina Bowl building still exhibits character-defining features of the Googie style architecture (shown in Figure 5.3-2), including: the prominent pyramid building entry, the folded plate entrance canopy, and the 60-foot high reverse triangular neon sign with a letter “C”; metal-framed fenestration, aluminum-framed windows, triangular façade baffles, and Bouquet Canyon Rock walls, and angled exposed structure awnings. Other existing architecture includes a Mayan-themed concrete block curved wall located beneath the pyramid entry. In addition, the Covina Bowl building has a flat roof, steel framing, and consists of tilt-up precast concrete walls. The building is surrounded on three sides with asphalt surface parking and low-raised planters with subtropical plantings, large accent boulders, and the original tiki lights.

Interior features include a north-south green terrazzo concourse, original diner counter and service area with mid-century appliances such as milkshake machine and pie safe, full-height entry lobby, Bouquet Canyon Rock walls, billiards room, nursery, beauty shop, and spacious meeting, banquet, and entertainment areas (e.g. Pyramid Room and Egyptian Room) that are shown in Figure 5.3-3.

The Covina Bowl building was designed by the architectural firm Powers, Daly and DeRosa, who pioneered the bowling center architecture with the design of the Covina Bowl. The Covina Bowl became a prototype for dozens of bowling centers designed by Powers, Daly and DeRosa. For 60 years, the Covina Bowl was a well-used recreation center, community gathering place, meeting spot, and special event location for residents, service clubs, and other local groups.

Historic Covina Bowl Building Exterior



Covina Bowl circa 1955



Covina Bowl circa 1956

Source: JMRC

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Existing Covina Bowl Building



Covina Bowl integrated entry, view west



Pyramid entry & pair integration detail, view northeast



Curved Mayan wall addition (1960s), view west



Existing Covina Bowl Building

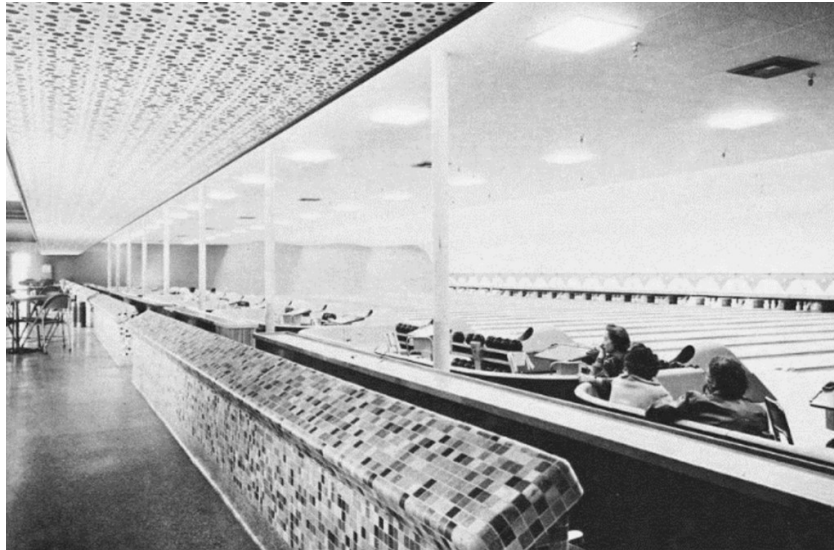
Source: JMRC

Covina Bowl Draft EIR

Figure 5.3-2

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Covina Bowl Historic Building Interior



Covina Bowl Terrazzo Concourse and Lanes (Circa 1956)



Diner/Coffee Shop (Circa 1956)



Covina Bowl Pyramid Room (Circa 1956)

Source: JMRC

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The Covina Bowl building was modified several times, including: a 21,800-square-foot south addition (1963) (shown in Figure 5.3-4); enlargement of the cocktail lounge (1962 & 1965), which likely included development of the curved Mayan concrete wall at the entry (shown in Figure 5.3-3); the replacement of the “Covina” script with the existing “C” letter in the 60-foot high reverse triangular sign (1970) (shown in Figure 5.3-2); and addition to the north end of the building (1974).

Interior modifications include: modernization of restrooms (date unknown), remodel of diner seating and back counter service area (late-1970s) (shown in Figure 5.3-4); replacement of bowling seating and scoring tables and the covering of concourse bulkhead (early-2000s), and removal of all 50 bowling lanes (2017) (shown in Figure 5.3-5).

The Cultural Resources Survey describes that modifications to the building since its original construction do not compromise the overall integrity of the property, and the Covina Bowl was formally determined eligible for listing in the National Register in 2016. The Cultural Resources Survey determined that the existing Covina Bowl building continues to meet the threshold for eligibility for listing in the National Register and California Register because it exemplifies the bowling center architectural type as pioneered by master architectural firm, Powers, Daly, and DeRosa and expressed in the Googie style of roadside commercial architecture.

In addition, the Covina Bowl building is eligible for local designation as a City Landmark under Chapter 17.81 of the City’s Municipal Code, as it reflects special elements of the City’s cultural and social history (Criterion 1), represents the work of notable architectural firm, Powers, Daly, and DeRosa (Criterion 3), and embodies distinctive characteristics of the bowling center architectural type and Googie style roadside architecture (Criterion 4) (CUL 2020).

Day Care Building. The existing day care building (shown in Figure 5.3-6) was originally constructed as a single-family residence in 1953 and was used as a day care. The Cultural Resources Survey determined that the integrity of the building has been thoroughly compromised by extensive alterations and it is not a historic resource (CUL 2020).

Unity Church of the Foothills. The existing church (shown in Figure 5.3-6) was originally constructed as a single-family residence in 1953 and was in use as a church from at least 1962. The Cultural Resources Survey determined that the building lacks significance and integrity because it has been compromised by extensive alterations, and it is not a historic resource (CUL 2020).

Office. The existing office building (shown in Figure 5.3-6) was originally developed in 1963, but underwent extensive remodels in 1980 and 1995 that included rear additions, changes in fenestration patterns and features, restuccoing, addition and embellishment of brick veneer, modification of side elevation walls, and addition of the east patio. The Cultural Resources Survey determined that the building lacks significance, and the alterations have compromised its original integrity. Therefore, the building is not a historic resource (CUL 2020).

Archaeological

Two different methods of describing archaeological resources are commonly used in the archaeological literature. The first defines four cultural horizons for the southern California coastal province, each with characteristic local variations:

- I. Early Man (~9000–8500 B.P.)
- II. Milling Stone (8500–4000 B.P.)
- III. Intermediate (4000–1500 B.P.)
- IV. Late Prehistoric (1500~200 B.P.)

The second employs a more ecological approach and defines five periods in prehistory:

- I. Lake Mojave (12000–7000 B.P.)
- II. Pinto (7000–4000 B.P.)
- III. Gypsum (4000–1500 B.P.)
- IV. Saratoga Springs (1500–800 B.P.)
- V. Shoshonean (800~200 B.P.)

The second approach views cultural continuity and change in terms of various environmental shifts. Many changes in settlement patterns and subsistence focuses are viewed as cultural adaptations to a changing environment, beginning with the gradual environmental warming in the late Pleistocene, the desiccation of the desert lakes during the early Holocene, the short return to pluvial conditions during the middle Holocene, and the general warming and drying trend, with periodic reversals, that continues to this day (CUL 2020).

The records searches conducted for the proposed Project identified that one linear archaeological resource (P19-187085) is located within one-half mile of the Project site. This resource is the potential location or vicinity of the Mojave Road, which according to historical documentation, existed in between Fort Drum in Wilmington, California, and Fort Mojave, Arizona. This resource currently is the location of the historic and modern Southern Pacific Railroad (SPRR) approximately 1,000 feet north of the Project site. However, no archaeological remains of the Mojave Road were discovered during the survey completed for the Cultural Resources Survey (CUL 2020). In addition, the Cultural Resources Survey determined that due to the absence of any previously recorded archaeological resources with physical remains within one-half mile of the Project site, the area has a low level of sensitivity for archaeological resources.

5.3.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.

The Initial Study established that the proposed Project would result in a less than significant impact related to Threshold CUL-3. As described in the Initial Study and listed previously, California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 regulate unexpected discoveries of human remains at development sites. Thus, no further assessment of this impact is required in this EIR.

5.3.5 METHODOLOGY

The analysis within this EIR section is based on the Cultural Resources Survey (Appendix G) prepared by JM Research & Consulting (CUL 2020), which contains information that was compiled through a cultural resource record searches, review of previous research and studies, field survey, and additional property-specific and historic research.

Covina Bowl Building Modifications



Dining back counter service area & appliances, view northeast (late-1970s)



Dining Counter seating & rock wall, view northwest (late-1970s)

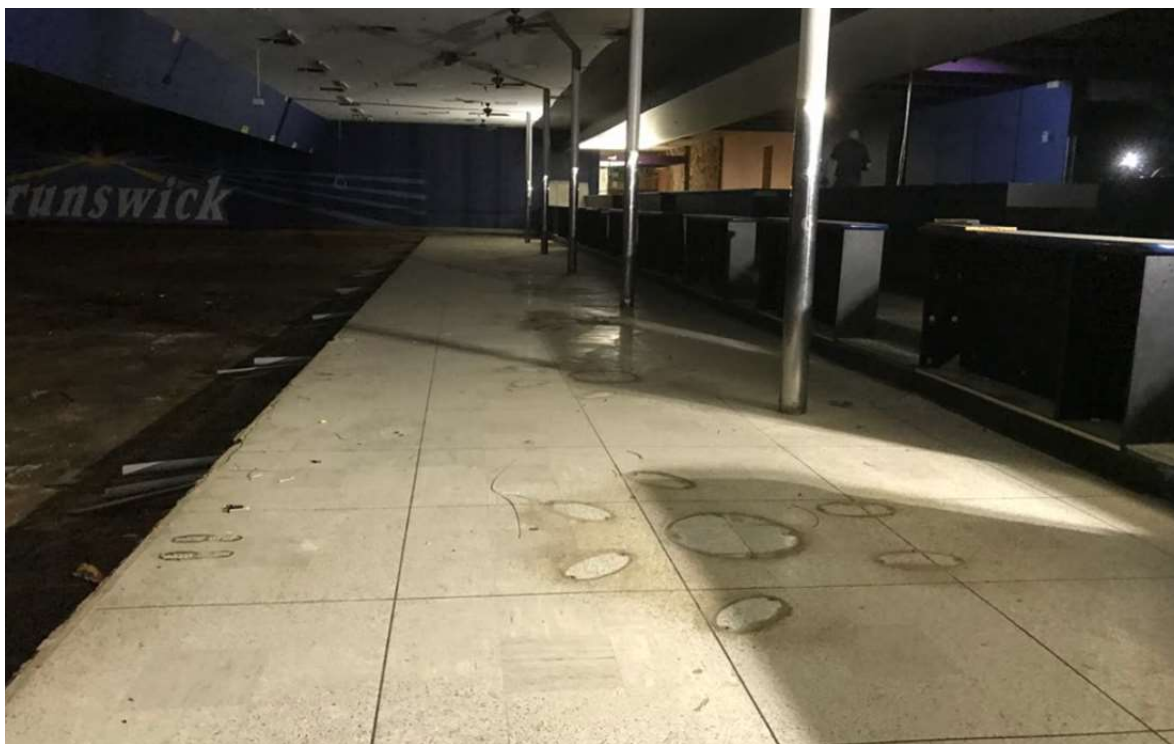


Covina Bowl Building South Addition (1963)

Source: JMRC

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Existing Condition of Bowling Area



Existing Bowling Floor with Modern Seating and Score Tables (from the early-2000s), view north



Bowling Lanes and Equipment Removed in 2017

Source: JMRC

Covina Bowl Draft EIR

Figure 5.3-5

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Existing Day Care, Church, and Office Buildings



Existing Day Care Building



Existing Church Building



Existing Office Building

Source: JMRC

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Record Searches

Archaeological and Historic Records Search. On October 28, 2019, a cultural resources records search was conducted at the South Central Coastal Information Center (SCCIC), the local clearinghouse for cultural resource records located at California State University, Fullerton. The SCCIC is the state-designated repository for records concerning historic and archaeological resources, studies and reports, and National and California Register-eligible properties in Los Angeles County. The records search checked for records concerning such resources and reports within one-half mile of the Project site.

Previous studies, reports, and historic photographs were also gathered and reviewed. This included historic and building-specific research, including building permits, historic aerial images, historic maps, historic photographs, and land records.

Field Surveys

Cultural and Historic Field Survey. An intensive-level, cultural resources pedestrian survey for historical resources was conducted over several visits from October 2019 through February 2020. The site was carefully inspected for evidence of historic resources. Current condition and architectural features were noted in the field and architectural quality and integrity were assessed. Potential cultural resources were recorded in the field using detailed note taking for documentation on DPR Forms, and digital photography was taken for contextual overviews and detail images of architectural features.

Historic Impacts

According to CEQA "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1), and the California Public Resources Code further defines substantial adverse change as "demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired" (PRC §5020.1(q)). CEQA Guidelines further provide in relevant part, "The significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources...or a local register of historical resources." In addition, the Guidelines provide direction to use the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Department of the Interior regulations 36 CFR 68) to determine if an impact would occur from implementation of the proposed Project. As such, the proposed Project was analyzed in comparison to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings to determine if historic impacts would result.

5.3.6 ENVIRONMENTAL IMPACTS

IMPACT CUL-1: THE PROJECT WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE PURSUANT TO CEQA GUIDELINES SECTION 15064.5.

Significant and Unavoidable Impact. As described previously, the Covina Bowl building is eligible for listing in the National Register, is listed in the California Register of Historical Resources (CRHR) and is eligible for designation as a City Landmark. The proposed Project would demolish the rear (west) mass that previously contained the bowling lanes (removed in 2017), the south addition (1963), portions of the northern part of

the building, and restore the remaining building in compliance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards; Department of the Interior regulations 36 CFR 68). As detailed in Section 3.0, *Project Description*, the Project includes the following features:

- **Massing and Form:** The Project would retain a majority of the original façade where the character-defining features are concentrated, including prominent A-frame entry and vertical baffles. The restoration/redesign of north end of the building would be guided by historic photos. The new west wall would be located in alignment with east edge of the concourse.
- **Roof:** The front A-frame roof would be retained and preserved/protected or repaired/restored, as needed, and the setback, height and design of new construction would not detract from its prominence. The original roofing should be assessed and preserved or repaired/restored, as needed. Added rooftop elements such as HVAC equipment would be screened from street view by utilizing shield effects of height, setback, and existing structures.
- **Walls:** The existing concrete walls would remain unsheathed, and necessary repairs would match in material and finish texture. New walls would be designed to be compatible with overall character of the building, existing material, and finish.
- **Fenestration:** Original windows would be repaired/restored, as needed, in original window openings. Missing windows in original openings would be replaced in kind. New windows or openings would not be introduced on the façade but are permissible on secondary elevations and should be designed to be consistent with original windows.
- **Entries:** The Project site entrance is marked by a 60-foot reverse triangular neon monument sign at Rimsdale Avenue that would be preserved and restored. The folded-plate canopy and entry assembly would be preserved and repaired. The Mayan-themed curved wall would be retained and restored, as necessary.

The Bouquet Canyon rock walls and piers at the courtyard and folded plate entry would be retained and remain unpainted. The triangular baffles on the façade should be retained, and the canopy at north concourse entry should be retained either in place or relocated into the design of the Project.

- **Interior:** The 10-foot-wide north-south green terrazzo concourse would be redeveloped with existing terrazzo materials and would lead to the proposed lawn bowling area. The coffee shop counter and service area would also be retained; and the dropped ceiling feature in dining room would be retained, if possible. In addition, the dropped ceiling in the entry area would be removed to expose and repair/restore the original full-height ceiling and entry windows.
- **Exterior Setting:** To maintain the exterior setting of the Project site the parking area would retain an L-shape by wrapping around the building. The Project would maximize the retention of landscape planters, mature landscaping, trees, and boulders; or relocating onsite if unable to retain in place or maintain health. The new landscaping would match in species whenever possible, or mimic existing plants in height, size, color, and foliage. The historic tiki lights in front planters would be repaired/restored.

The design of the new development would reference the character defining features and materials such as the folded plate angle, rock detail, and muted color palette to ensure the Covina Bowl and new construction are compatible.

As described previously, according to CEQA, an impact would occur if alteration occurs such that the significance of a historical resource would be impaired, and the following Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings are used in the following analysis to determine if an impairment would occur from implementation of the proposed Project.

1. *Would the property be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships?*

The proposed Project does not include any bowling uses, and the Project would remove the rear (west) mass, which previously housed the bowling lanes. The proposed Project provides a new use that retains the distinctive exterior and preserves important spatial relationships. The proposed Project includes retention of nearly the entire original façade and main front mass, which provides the majority of the character-defining architectural features.

However, construction of the proposed multi-family residential units, which includes removal of the rear, west mass of the Covina Bowl building that housed the bowling lanes, is in conflict with this standard as it would substantially alter the mass of the original building design and its ability to exemplify the architectural type. Thus, a conflict with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings would occur, and an impact would result.

2. *Would the historic character of the property be retained and preserved? Would the removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property be avoided?*

The proposed Project would retain 188 feet, or 76%, of the original façade length (where the character defining features are concentrated) and the entire depth of the main front mass (70 feet) to its interior division at the concourse, which would be reduced in width as an exterior feature, but would continue its primary function as a walkable path. Additionally, the original setback, landscaping, and L-shaped corner parking lot would be retained. Also, all of the elements of the entry design, (including the pyramid-shaped A-frame entry, folded plate canopy, and the 60-foot high neon sign) would be retained. Also, the Bouquet Canyon Rock wall would be retained through relocation or reuse to retain the distinctive rock material as a visible feature from W. San Bernardino Avenue.

Removal of the west portion of the building is a modification that occurs on the rear, in an area that contributes relatively few distinctive architectural features or materials in comparison to the original façade, front mass, elaborate entry, and corner setting. However, the rear mass, which contained the bowling lanes, and the overall size and mass of the whole building, defines the character of the building as a bowling center, and its removal conflicts with this standard. Thus, a conflict with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings would occur, and an impact would result.

3. *Would the property be recognized as a physical record of its time, place, and use? Would changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, be undertaken?*

The new construction that would occur by the proposed Project would neither mimic nor be in extreme contrast to historic construction. The design inspiration of the new construction would be taken from the features, materials, spaces, finishes, and construction techniques of the Covina Bowl to provide compatibility with the overall historic character of the building. Thus, the proposed Project would be consistent with this standard, and no impact related to this standard would occur.

4. *Would changes to a property that have acquired historic significance in their own right be retained and preserved?*

The Cultural Resources Survey describes that the Mayan-themed curved, concrete wall has acquired historic significance in its own right. The Mayan wall is proposed for retention and would not be impacted by implementation of the proposed Project.

The significance of the Covina Bowl in the National Register nomination includes the 1962 south addition based on its early construction and design by the same architectural firm, Powers, Daly, and DeRosa. However, the south addition does not rise to the level of “significant in its own right” for the purposes of applying this standard because it lacks architectural inspiration and integration.

Some original features are repeated such as the full-height aluminum framed storefront and others are incorporated unsuccessfully such as the Bouquet Canyon Rock, which appears applied to the façade as veneer (though it is not) rather than sturdy, freestanding yet integrated walls or piers. Furthermore, the addition includes a full-height, wrap around pergola with repeating flattened, pointed-arch bays, which is not related to the original design. Also, the size of the addition shifts the originally offset pyramid-shaped entry to the center of the new façade length and reduces the prominence of the entire integrated entry, which is not consistent with the Googie style or original design intent. Therefore, the south addition is not a change that has “acquired significance in its own right,” and its removal by the proposed Project would not conflict with this standard.

5. *Would the distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property be preserved?*

The proposed Project would preserve the exterior and remaining interior distinctive, materials, features, construction techniques and craftsmanship that characterize the property. The entry, which combines style, construction technique, and craftsmanship and is the most prominent of the character-defining features. The pyramid A-frame entry roof, folded plate canopy, and 60-foot high sign would be preserved and repaired/restored, as needed. Additionally, the glazed entry and clerestory windows of the pyramid would be repaired/restored, fully preserving this historic element.

Interior preservation work includes improvement of the lobby to restore it to full height with removal of the added dropped ceiling and the restored clerestory windows. The diner/coffee shop with Bouquet Canyon Rock wall, counter space and stools, and fixtures would be retained; and the green terrazzo concourse would be redeveloped with existing terrazzo materials.

6. *Would deteriorated historic features be repaired rather than replaced? Where the severity of deterioration requires replacement of a distinctive feature, would the new feature match the old in design, color, texture and, where possible, materials? Would replacement of missing features be substantiated by documentary and physical evidence?*

Deteriorated historic features are anticipated to be repaired and restored, as described above in Standard 5; however, where severity of deterioration requires replacement, the replacement would be in kind, matching design, color, texture, finishes, and materials. The non-historic north end addition would be removed and reconstructed to be compatible with original design and other extant features, thereby increasing the current compatibility of the existing north end with the overall character of the historic building. Therefore, the proposed Project would be consistent with this standard, and impacts related to this standard would not occur.

7. *Would chemical or physical treatments, if appropriate, be undertaken using the gentlest means possible? Would treatments that cause damage to historic materials not be used?*

No chemical or physical treatments are proposed to be used the repair and restore the historic features. All repair and restoration work to historic materials by the proposed Project would be guided by appropriate Preservation Brief(s) published by the National Park Service, which prohibit damaging treatments and assures the gentlest means possible. Therefore, the proposed Project would be consistent with this standard, and impacts related to this standard would not occur.

8. *Would new additions, exterior alterations or related new construction destroy historic materials, features and spatial relationships that characterize the property? Would the new work be differentiated from the old and or would be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment?*

The proposed Project would maintain the corner orientation of the Covina Bowl building and allow its continued, prominent visibility to pedestrian and motorists. The proposed residential buildings would be 37 feet in height, which would not exceed the approximately 40-foot entry pyramid. The architecture of the new residential buildings is proposed to reference, not mimic, the character defining features and materials with minimal detailing such as angled wing entry awnings, natural rock embellishment, and a complimentary but muted color palette.

The proposed removal of the south addition would not destroy historic materials, features, or spatial relationships that characterize the property (see discussion under number 4). The proposed south and west walls would achieve compatibility by use of smooth wall surface and minimal embellishment; and the proposed west wall would be constructed in alignment with the extant interior wall on the east edge of the concourse, and would include important historic features that include, the Bouquet Canyon Rock wall at the coffee shop/diner. Therefore, the proposed Project would be consistent with this standard, and impacts related to this standard would not occur.

9. *Would new additions and adjacent or related new construction be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired?*

As described previously, the proposed west and south walls, would be designed to provide smooth transitions to the remaining portions of the historic building. Also, adaptive reuse of the historic portions of the site would be completed in a manner to avoid damage to existing historic features and materials. The proposed construction of the west and south walls would also ensure the preservation of the essential form and integrity of the historic property in the event that the new walls were removed in the future.

In addition, the proposed residential buildings would be separated from the Covina Bowl building and would not encroach upon the setting, which would allow for future removal without impairing the essential form and integrity of the Covina Bowl building. Therefore, the proposed Project would be consistent with this standard, and impacts related to this standard would not occur.

As described previously, the basis for the Covina Bowl's significance and eligibility for listing in the National Register and listing in the CRHR is based on the property's ability to exemplify its architectural type, a bowling center, as designed by the architectural firm Powers, Daly, and DeRosa, and expressed in the prominent Google style of roadside commercial architecture.

The proposed Project includes demolition of the rear, west mass that contained the bowling lanes. This would historically materially impair the Covina Bowl building. Although the property would continue to exhibit character-defining features of the Googie style and, though lessened, roadside commercial architecture, it would result in a substantial change. Therefore, implementation of the proposed Project would result in a substantial adverse change in the significance of the Covina Bowl (a historic resource) and a significant impact would occur.

Mitigation Measures CUL-1 through CUL-5, which would provide a high quality digital scans of Covina Bowl original construction plan set (1955), implement an interpretative program regarding the history and significance of the Covina Bowl, and submit a nomination application to designate the Covina Bowl as a City Landmark, have been included to reduce historic impacts to the extent feasible. However, demolition of the rear west mass would continue to result in a substantial adverse effect on the National Register eligible and CRHR listed historic resource, and impacts would remain significant and unavoidable after implementation of mitigation.

Impacts related to the City landmark designation are based on the criteria in CMC Section 17.81 (listed previously). Implementation of the proposed Project would preserve the front mass and majority of the character-defining architectural features; therefore, the Covina Bowl building would continue to represent the work of Powers, Daly, and DeRosa (CMC Section 17.81 Criterion 3). Additionally, it would preserve the architectural design that embodies the Googie style (CMC Section 17.81 Criterion 4). Also, the identification and character of the building would continue to reflect special elements of the City's cultural and social history (CMC Section 17.81 Criterion 1). Therefore, the Covina Bowl would continue to be eligible for local designation under Chapter 17.81 of the Covina Municipal Code, and impacts related to the local historical designation would not occur from implementation of the proposed Project.

IMPACT CUL-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO SECTION 15064.5.

Less than Significant Impact. As described previously, the ground surface within the Project site has long been used for urban development. The Project site was used for a citrus grove until the late-1950s and early-1960s when commercial and residential uses were developed on the site. Thus, the site has been previously disturbed from both agricultural uses and development, including ground disturbance to depths for installation of the existing utility infrastructure that serves the site. In addition, the Cultural Resources Survey determined that the Project site has a low level of sensitivity and is unlikely to yield archaeological resources.

As described in Section 3.0, *Project Description*, construction activities within the Project site include removal of the existing infrastructure and landscaping; grading and excavation; and installation of the new drainage and utility infrastructure. The grading and excavation process would remove and recompact the loose alluvium that currently underlies the upper 5 to 6 feet of soils on the northern portion of the site; and the 10 to 12 feet of loose alluvium on the southern portion of the site. As the Project site has a low level of sensitivity for archaeological resources and the site has been previously disturbed, the Cultural Resources Survey (Appendix G) determined that impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant and that no mitigation measures are required.

5.3.7 CUMULATIVE IMPACTS

As detailed below, cumulatively considerable impacts related to archaeological resources would not occur from implementation of the Project. However, because the Project would result in removal of historic resource, impacts related to historic resources would be cumulatively considerable.

Historic Resources: Because all historical resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. Federal, state, and local laws and regulations protect historic resources when feasible. However, it is not always feasible to protect historic resources. As described previously, the Covina Bowl is eligible for the National Register, is listed in the CRHR, and is eligible for local designation under Chapter 17.81 of the Covina Municipal Code. Because the Covina Bowl is considered a state historic resource and eligible for listing as a national and local historic resource, the cumulative study area for historic resources includes the City of Covina, State of California, and United States.

As described previously, the proposed Project, which includes demolition of the rear (west) mass of the Covina Bowl building, which contained the bowling lanes, would result in a direct impact to a historic resource. As a result, Mitigation Measures CUL-1 through CUL-5 are included, which requires provision of high quality digital scans of Covina Bowl original construction plan set (1955), implement an interpretative program regarding the history and significance of the Covina Bowl, and submittal of a nomination application to designate the Covina Bowl as a City Landmark. However, demolition of an essential part of an historic resource causing a substantial adverse change in the significance of the resource, cannot be mitigated to a less-than-significant level; and the loss of the historic resource would result in a cumulatively considerable impact to historic resources.

Archaeological Resources: The cumulative study area for archaeological resources includes the southern California region, which contains the same general prehistoric uses and migration trends as the Project site. The Cultural Resources Survey (Appendix G) determined that Project site has a low level of sensitivity and is unlikely to yield archaeological resources. In addition, the Project site has been disturbed from previous agricultural and development uses, and impacts related to the redevelopment of the site would be less than significant. Therefore, implementation of the Project would not contribute to a significantly cumulative impact and impacts to archaeological resources would be less than cumulatively significant.

5.3.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

- National Historic Preservation Act
- Covina Municipal Code Chapter 17.81
- California Health and Safety Code Section 7050.5
- Public Resources Code Section 5097.98

5.3.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impact would be **potentially significant**:

- Impact CUL-1: Implementation of the Project would impact historic resources.

Upon implementation of existing regulatory requirements, the following impact would be **less than significant**:

- Impact CUL-2: Implementation of the Project would have a less than significant impact on archaeological resources.

5.3.10 MITIGATION MEASURES

Mitigation Measure CUL-1: Covina Bowl Rehabilitation Plan. Prior to demolition of any structures, it shall be demonstrated to the City of Covina that the Covina Bowl will retain the structural integrity of the historic building during construction and shall be verified that constructed plans and building specifications are consistent with the Covina Bowl Rehabilitation Plan (Appendix C of the Cultural Resources Survey [Draft EIR Appendix G) to ensure that the proposed treatments, and new or revised treatments that may come to light through ongoing physical investigation and repair assessments, will achieve the greatest compliance with the Secretary of the Interior's Standards and applicable guidelines.

Mitigation Measure CUL-2: Documentation. Prior to demolition of any structures, a high quality digital scans of Covina Bowl original construction plan set (1955) shall be submitted to the City of Covina Community Development Department, including personal notations, obtained through community outreach during the Cultural Resources Survey (Draft EIR Appendix G) for inclusion with the original plans that are already on file with the Covina Community Development Department.

Mitigation Measure CUL-3: Interpretive Program. Prior to demolition of any structures, the Project applicant shall develop an on-site interpretive program to share the history and significance of the Covina Bowl. The program should include the enhancement of two locations (1) in the vicinity of the proposed rear lawn bowling feature where the bowling lanes were located and (2) in a publicly visible and/or accessible location, such as near the public right-of-way or entry to maintain the relationship of the property with the public. The interpretive program shall include, at a minimum, a brief written history of the Covina Bowl cast in bronze and displayed at each location. To the extent possible, the interpretive program should also include one or more other creative elements, in one or both locations, that may be artfully reimagined from historic photographs or bowling-related historic material salvage that is unable to be reused in the proposed project, such as tile from the concourse bulkhead or discarded pieces of green terrazzo.

Mitigation Measure CUL-4: Local Designation. Prior to demolition of any structures, the Project applicant shall prepare and submit a local landmark designation nomination application to the Community Development Department, Planning Division to designate the Covina Bowl as a City Landmark.

Mitigation Measure CUL-5: Architectural Historian. Prior to the issuance of building permits, the Project applicant shall retain an Architectural Historian of Record, who meets the Secretary of the Interior's Professional Qualification Standards, to review and issue a Notice to File to ensure that the Project demolition, preservation, and construction plans maintain compliance with the Covina Bowl Rehabilitation Plan and the other mitigation measures herein. The Architectural Historian of Record shall supervise demolition and preservation activities, direct appropriate treatment of unforeseen conditions, and provide consultation regarding methods and materials, as needed.

5.3.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

For Impact CUL-1, Mitigation Measures CUL-1 through CUL-5 are included, which requires provision of high quality digital scans of Covina Bowl original construction plan set (1955), implement an interpretative program regarding the history and significance of the Covina Bowl, and submittal of a nomination

application to designate the Covina Bowl as a City Landmark. However, demolition of an essential part of an historic resource causing a substantial adverse change in the significance of the resource, cannot be mitigated to a less-than-significant level. Therefore, impacts related to historic resources would remain significant and unavoidable after implementation of Mitigation Measures CUL-1 through CUL5.

REFERENCES

Covina Bowl Project Cultural Resources Survey. May 2020 (CUL 2020). Prepared by JM Research & Consulting.

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5.4 Energy

5.4.1 INTRODUCTION

This section of the EIR assesses the significance of the use of energy, including electricity, natural gas and gasoline, and diesel fuels, that would result from implementation of the proposed Specific Plan Project. It discusses existing energy use patterns and examines whether the proposed Project (including its development and operation) would result in the consumption of large amounts of fuel or energy or use such resources in a wasteful manner.

Refer to Section 5.6, *Greenhouse Gas Emissions*, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emission. This section includes data from the Covina Bowl Energy Tables (UC 2020), Prepared by Urban Crossroads, included as Appendix D.

5.4.2 REGULATORY SETTING

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

In response to *Massachusetts et al. vs. Environmental Protection Agency et al.*, the Bush Administration issued an executive order on May 14, 2007, directing the U.S. Environmental Protection Agency (USEPA) and the Department of Transportation (USDOT) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

California Public Utilities Commission Plans and Programs

The California Public Utilities Commission (CPUC) has authority to set electric rates, regulate natural gas utility service, protect consumers, promote energy efficiency, and ensure electric system reliability. The CPUC has established rules for the planning and construction of new transmission facilities, distribution facilities, and substations. Utility companies are required to obtain permits to construct certain power line facilities or substations. The CPUC also has jurisdiction over the siting of natural gas transmission lines.

The CPUC regulates distributed energy generation policies and programs for both customers and utilities. This includes incentive programs (e.g., California Solar Initiative) and net energy metering policies. Net energy metering allows customers to receive a financial credit for power generated by their onsite system and fed back to the utility. The CPUC is involved with utilities through a variety of energy procurement programs, including the Renewable Portfolio Standard program.

In 2008, the CPUC adopted the Long-Term Energy Efficiency Strategic Plan, which is a road map to achieving maximum energy savings in California through 2020. Consistent with California's energy policy and electricity "loading order," the Energy Efficiency Strategic Plan indicates that energy efficiency is the highest priority resource in meeting California's energy needs. The CPUC also adopted energy goals that require all new residential construction in California to be zero net energy by 2020. The zero-net energy goal means new buildings must use a combination of improved efficiency and distributed renewable energy generation to meet 100 percent of their annual energy need. In addition to the zero net energy goals for residential buildings by 2020, the CPUC has adopted goals that all new commercial construction in California will be zero net energy by 2030, and 50 percent of existing commercial buildings will be retrofit to zero net energy by 2030.

Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased from 33 percent to 50 percent by December 31, 2030, thereby doubling energy efficiency within the state. SB 350 makes revisions to the California Renewable Portfolio Standards (RPS) Program and to certain other requirements on public utilities and publicly owned electric utilities. SB 350 also requires local publicly-owned electric utilities to establish annual targets for energy efficiency savings and demand reduction consistent with a statewide goal established by the CPUC and provides incentives for electrification of rail facilities. Local utilities would be required to develop more detailed strategies and incentives for use of renewable energy sources, resulting in an increased demand for renewable energy generation.

SB 350 emphasizes the important role of electric vehicles in California's overall scheme to combat climate change, declaring that "[d]eploying electric vehicles should assist in grid management, integrating generation from eligible renewable energy resources, and reducing fuel costs for vehicle drivers." The bill promotes the development of additional electric vehicle charging infrastructure to encourage greater use of electric cars and requires electrical utilities to include expansion of electrical vehicle charging facilities as part of their strategies and incentives for reducing overall energy consumption.

Assembly Bill 1007 (Pavley, Chapter 371, Statutes of 2005)

Assembly Bill 1007 required the California Energy Commission (CEC) to prepare a state plan (State Alternative Fuels Plan) to increase the use of alternative fuels in California. The Commission prepared the State Alternative Fuels Plan in partnership with the California Air Resources Board and in consultation with other state, federal, and local agencies. The final State Alternative Fuels Plan, published in December 2007, attempts to achieve an 80-percent reduction in greenhouse gas emissions associated with personal transportation, even as California's population increases. Measures proposed that would reduce petroleum fuel use include:

1. Lowering the energy needed for personal transportation by tripling the energy efficiency of on-road vehicles by 2050 through:
 - a. Conventional gas, diesel, and flexible fuel vehicles (FFVs) averaging more than 40 miles per gallon (mpg).
 - b. Hybrid gas, diesel, and FFVs averaging almost 60 mpg.
 - c. All electric and plug-in hybrid electric vehicles (PHEVs) averaging well over 100 mpg (on a greenhouse gas equivalents [GGE] basis) on the electricity cycle.
 - d. Fuel cell vehicles (FCVs) averaging over 80 mpg (on a GGE basis).
2. Moderating growth in per capita driving, reducing today's average per capita driving miles by about 5 percent or back to 1990 levels.

3. Changing the energy sources for transportation fuels from the current 96 percent petroleum-based to approximately:
 - a. 30 percent from gasoline and diesel from traditional petroleum sources or lower GHG emission fossil fuels such as natural gas.
 - b. 30 percent from transportation biofuels.
 - c. 40 percent from a mix of electricity and hydrogen.
4. Producing transportation biofuels, electricity, and hydrogen from renewable or very low carbon-emitting technologies that result in, on average, at least 80 percent lower life cycle GHG emissions than conventional fuels.
5. Encouraging more efficient land uses and greater use of mass transit, public transportation, and other means of moving goods and people.

Title 24 Energy Efficiency Standards and California Green Building Standards

The 2019 California Code of Regulations Title 24 Part 6 became effective on January 1, 2020. The new standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources. CEC indicates that these Title 24 standards will reduce energy consumption by 7 percent for residential buildings and 30 percent for nonresidential buildings compared to the 2016 Title 24 requirements (CEC 2019). The 2019 CalGreen Building Standards Code has been adopted by reference in the City's Municipal Code in Section 14.02.010(N).

City of Covina Energy Action Plan

The City of Covina has implemented an Energy Action Plan that summarizes the City's existing and future energy uses, projects City's future energy use, through 2023, which identifies energy efficiency goals and targets, and creates a strategy to meet the City and State energy and GHG reduction goals. The Energy Action Plan sets the following energy efficiency targets:

- Reduce existing residential electricity use 5 percent below baseline 2018 levels by 2023.
- Reduce gas usage by 5 percent below baseline 2018 levels by 2023.
- Complete three (3) energy efficiency projects by 2023.

In addition, the Energy Action Plan includes goals and policies to provide for efficient energy consumption, which include the following:

Goal 1: Maximize energy efficiency at existing City facilities and infrastructure.

Policy 1.1: Utilize benchmarking data to identify possible energy efficiency projects at existing City facilities and support the efforts to achieve reduction targets by monitoring and reporting.

Policy 1.2: Enhance the energy efficiency of City buildings and structures through retrofits.

Policy 1.3: Establish, maintain, and update a plan to secure additional funding for energy efficiency projects.

Policy 1.4: Monitor, evaluate, and update the Energy Action Plan on a continuing basis.

Policy 1.5: Become a water conservation leader in the San Gabriel Valley and lead other municipalities by example.

Policy 1.6: Incorporate energy efficiency as a key element in designing and building new City structures and facilities.

Goal 2: Ensure that energy efficiency practices are incorporated into municipal operations.

Policy 2.1: Work with the City Council to include energy efficiency updates and topics when updating the City's General Plan, codes, policies, and Strategic Plan.

Policy 2.2: Develop a plan to effectively adjust City facilities' energy usage to accommodate any switches or changes in peak demand rates and hours.

Policy 2.3: Track energy savings and facilitate analysis of energy-saving benefits.

Policy 2.4: Track federal and state energy policies and work with City departments to adhere to any new energy efficiency mandates.

Goal 3: Maximize City staff's energy efficiency awareness and involve the City's employees and elected officials to promote energy efficiency.

Policy 3.1: Lead by example by expanding city staff education programs and integrating energy management practices into daily operation.

Goal 4: Demonstrate a commitment to realize the Energy Action Plan goals through creative, equitable, and coordinated partnerships.

Policy 4.1: Maximize the benefits from regional partners to enhance energy efficiency projects at the City.

5.4.3 ENVIRONMENTAL SETTING

Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Covina. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2018 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the state to cut greenhouse gas emissions 40 percent below 1990 levels by 2030 in order to help address global climate change. It describes that in 2018 Approximately 35% of power that SCE delivered to customers in 2018 came from renewable sources (SCE 2018).

The Project site is currently served by the electricity distribution systems that exists along the roadways adjacent to the Project site.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas purveyor in the City of Covina and is the principal distributor of natural gas in Southern California. SoCalGas estimates that gas demand will decline at an annual rate of 0.5 percent from 2018 to 2035 due to modest economic growth, mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to advanced metering infrastructure (CGEU 2018). The gas supply available to SoCalGas is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources, the Rocky Mountains, and Canada (CGEU 2018). SoCalGas designs its facilities and supplies to provide continuous service during extreme peak demands and has identified the ability to meet peak demands through 2035 in its 2018 report (CGEU 2018).

The Project site is currently served by the natural gas distribution system that exists within the roadways that are adjacent to the site.

5.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a project could have a significant effect if it were to:

- E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.4.5 METHODOLOGY

A number of factors are considered when weighing whether a project would use a proportionately large amount of energy or whether the use of energy would be wasteful in comparison to other projects. Factors such as the use of onsite renewable energy features, energy conservation features or programs, and relative use of transit are considered.

According to Appendix F of the CEQA Guidelines, conserving energy is defined as decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F of the CEQA Guidelines nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy.”

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used during construction activities. Energy usage during project operation would be considered “wasteful, inefficient, and unnecessary” if the project were to violate federal, state, and/or local energy standards, including Title 24 of the California Code of Regulations, inhibit pedestrian or bicycle mobility, inhibit access to transit, or inhibit feasible opportunities to use alternative energy sources, such as solar energy, or otherwise inhibit the conservation of energy.

5.4.6 ENVIRONMENTAL IMPACTS

IMPACT E-1: THE PROJECT WOULD NOT RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES, DURING PROJECT CONSTRUCTION OR OPERATION.

Construction

Less than Significant Impact. The buildout of the Project would consume electrical energy and fuel. During construction, energy would be consumed in 3 general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the construction site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction for buildout of the Project would represent a “single-event” electric energy and fuel demand and would not require on-going or permanent commitment of energy or diesel fuel resources. Demolition of the existing building area and infrastructure that exist onsite would need to be undertaken; however, because much of the demolition materials can be recycled, the demolition needed is not considered to be wasteful. In addition, the extent of construction activities that would occur from buildout of the Project is limited. Construction would occur over a 15-month period and the demand for construction-related electricity and fuels would be limited to that time frame.

Also, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Additionally, construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment during the City’s construction permitting process. Compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption. The energy modeling of the construction that would be required to buildout the proposed Project shows that electricity usage over the 15-month construction period would be approximately 72,483.78 kWh, as shown in Table 5.4-1.

Table 5.4-1: Estimated Construction Electricity Usage

Land Use	Cost per kWh	Project Construction Electricity Usage (kWh)
General Office Building	\$0.08	4,492
Fast Food Restaurant without Drive Thru ¹	\$0.08	386
Apartments Mid Rise	\$0.10	67,605
Total Project Electricity Usage (kWh)		72,483.78

Source: Urban Crossroads, 2020.

Also, as shown in Table 5.4-2, construction that would be required to buildout the proposed Project is estimated to result in the need for 61,070 gallons of diesel fuel.

Table 5.4-2: Estimated Construction Fuel Consumption

Activity/ Duration	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP- hrs/day	Total Fuel Consumption (gal. diesel fuel)
Demolition (20 days)	Concrete/Industrial Saws	81	1	8	0.73	473	511
	Excavators	158	3	8	0.38	1,441	1,558
	Rubber Tired Dozers	247	2	8	0.40	1,581	1,709
Site Preparation (10 days)	Crawler Tractors	212	4	8	0.43	2,917	1,577
	Rubber Tired Dozers	247	3	8	0.40	2,371	1,282
Grading (20 days)	Crawler Tractors	212	3	8	0.43	2,188	2,365
	Excavators	158	1	8	0.38	480	519
	Graders	187	1	8	0.41	613	663
	Rubber Tired Dozers	247	1	8	0.40	790	854
Building Construction (230 days)	Cranes	231	1	8	0.29	536	6,663
	Crawler Tractors	212	3	8	0.43	2,188	27,200
	Forklifts	89	3	8	0.20	427	5,311
	Generator Sets	84	1	8	0.74	497	6,182

Activity/ Duration	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP- hrs/day	Total Fuel Consumption (gal. diesel fuel)
	Welders	46	1	8	0.45	166	2,059
Paving (20 days)	Pavers	130	2	8	0.42	874	944
	Paving Equipment	132	2	8	0.36	760	822
	Rollers	80	2	8	0.38	486	526
Architectural Coating (20 days)	Air Compressors	78	1	8	0.48	300	324
Total Construction Fuel Demand (Gallons Diesel Fuel)							61,070

Source: Urban Crossroads, 2020.

Table 5.4-3 shows that construction workers would use approximately 12,389 gallons of fuel to travel to and from the construction area. Tables 5.4-4 and 5.4-5 show that approximately 1,870 gallons of fuel would be used by medium high duty trucks, and 25,820 gallons of fuel would be used for hauling by heavy high duty trucks during construction.

Table 5.4-3: Estimated Construction Worker Fuel Consumption

Construction Activity	Worker Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023 Construction Activities					
Demolition (20 days)	15	14.7	4,410	32.00	138
Site Preparation (10 days)	18	14.7	2,646	32.00	83
Grading (20 days)	15	14.7	4,410	32.00	138
Building Construction (210 days)	111	14.7	342,657	32.00	10,708
2024 Construction Activities					
Building Construction (20 days)	111	14.7	32,634	32.91	992
Paving (20 days)	15	14.7	4,410	32.91	134
Architectural Coating (20 days)	22	14.7	6,468	32.91	197
Total Construction Worker Fuel Consumption					12,389

Source: Urban Crossroads, 2020.

Table 5.4-4: Estimated Construction Vendor Fuel Consumption (Medium High Duty Trucks)

Construction Activity	Vendor Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023 Vendor Trips					
Building Construction (210 days)	11	6.9	15,939	9.32	1,710

Construction Activity	Vendor Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2024 Vendor Trips					
Building Construction (20 days)	11	6.9	1,518	9.48	160
Construction Medium-Duty Truck Total					1,870

Source: Urban Crossroads, 2020.

Table 5.4-5: Estimated Construction Hauling Fuel Consumption (Heavy High Duty Trucks)

Construction Activity	Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023 Vendor Trips					
Building Construction (210 days)	11	6.9	15,939	6.76	2,357
2024 Vendor Trips					
Demolition Hauling (30 days)	1,254	20	752,400	6.10	123,328
2023 Hauling Trips					
Demolition (20 days)	18	20	7,200	6.76	1,065
Grading (20 days)	375	20	150,000	6.76	22,178
Heavy-Duty Truck Total (Vendor + Hauling)					25,820

Source: Urban Crossroads, 2020.

Overall, construction activities would require limited energy consumption, would comply with all existing regulations, and would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner. Thus, impacts related to construction energy usage would be less than significant.

Operation

Once operational, the residential and commercial/office uses would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of building areas, water heating, operation of electrical systems and appliances, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption. Additionally, the Project includes features to reduce energy consumptions, such as energy efficient appliances, and Title 24 compliant lighting and plumbing fixtures.

As detailed in Table 5.4-6, operation of the proposed Project is estimated to result in 3,363,509 annual VMT and an estimated annual fuel consumption of 138,254 gallons of fuel.

Table 5.4-6: Estimated Annual Operational Automobile Fuel Consumption

Vehicle Type	Annual Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Annual Fuel Consumption (gallons)
Light Duty Auto	1,834,283	55,732	55,732
Light Duty Truck 1	150,080	5,406	5,406
Light Duty Truck 2	694,763	26,336	26,336
Medium Duty Vehicle	398,411	18,555	18,555
Light-Heavy-Duty Truck 1	50,459	3,618	3,618
Light-Heavy-Duty Truck 2	21,032	1,463	1,463
Medium-Heavy-Duty Truck	69,345	7,317	7,317
Heavy-Heavy-Duty Truck	106,812	15,583	15,583
Other Bus	8,611	1,256	1,256
Urban Bus	6,966	1,743	1,743
Motorcycle	17,547	494	494
School Bus	2,341	284	284
Mobile Home	2,859	470	470
TOTAL	3,363,509		138,254

Source: Urban Crossroads, 2020.

Trip generation and VMT generated by the Project would be from redevelopment and infill development within an urban environment, and the proposed residential and commercial/office uses are consistent with the existing uses in the City. The Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor does it propose uses that are associated with excess and wasteful vehicle energy consumption.

In addition, the Project includes sidewalks that would facilitate and encourage pedestrian access and bicycle parking in the commercial/office parking area to encourage bicycle transportation, which would assist in reducing VMT and associated energy consumption. Thus, the transportation energy consumption during operation of the proposed Project would not be considered inefficient, wasteful, or otherwise unnecessary.

Table 5.4-7 details that operation of the proposed Project would use approximately 1,566,467 thousand British thermal units (kBtu) per year of natural gas, and Table 5.4-8 shows that approximately 618,001 kilowatt-hour (kWh) per year of electricity would be used for operation.

Table 5.4-7: Estimated Annual Operational Natural Gas Demand

Natural Gas Demand	kBtu/year
Apartments Mid Rise	1,277,720
Fast Food Restaurant without Drive Thru	206,977
General Office Building	81,770
Other Asphalt Surfaces	0
Total Natural Gas Demand	1,566,467

Source: Urban Crossroads, 2020.

Table 5.4-8: Estimated Annual Operational Electricity Demand

Electricity Demand	kWh/year
Other Asphalt Surfaces	464,814
Other Non-Asphalt Surfaces	37,383
Parking Lot	115,804
Refrigerated Warehouse	0
Total Natural Electricity Demand	618,001

Source: Urban Crossroads, 2020.

All development within the City would be required to meet the current Title 24 energy efficiency standards, as included in the City's Municipal Code Section 14.02.010(N). The City's administration of the Title 24 requirements and the City's Energy Action Plan includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and implementation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Thus, impacts would be less than significant.

IMPACT E-2: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY.

No Impact. As described previously, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the new construction, as well as compliance with the City's Energy Action Plan. The City's administration of the CCR Title 24 and the City's Energy Action Plan requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. In addition, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. Thus, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur.

5.4.7 CUMULATIVE IMPACTS

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within southern California because energy supplies (including electricity, natural gas, and petroleum) are generated and distributed throughout the southern California region.

All development projects throughout the region would be required to comply with the energy efficiency standards in the Title 24 requirements. Additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, cumulative electricity and natural gas consumption would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed mixed uses would be primarily attributable to transportation, especially vehicular use. However, state fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the state Long Term Energy Efficiency Strategic Plan would reduce

reliance on non-renewable energy resources. For these reasons, the consumption of petroleum would not occur in a wasteful, inefficient, or unnecessary manner and would be less than cumulatively considerable.

5.4.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

The following standard regulation would reduce potential impacts related to energy:

- California Energy Code (Code of Regulations, Title 24 Part 6).
- CalGreen Building Standards Code as included in the City's Municipal Code in Section 14.02.010(N).

5.4.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts E-1 and E-2 would be less than significant.

5.4.10 MITIGATION MEASURES

Impacts related to energy would be less than significant and no mitigation measures are required.

5.4.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to energy would be less than significant.

REFERENCES

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5.5 Geology and Soils

5.5.1 INTRODUCTION

This section addresses potential environmental effects of the proposed Project related to geology, soils, seismicity, and paleontological resources. The impacts examined include risks related to geologic hazards such as earthquakes, liquefaction, expansive soils; impacts on the environment related to soil erosion and sedimentation; and impacts related to paleontological resources. This section includes data from the Geotechnical Engineering Investigation (GEO 2017), Prepared by GeoSoils Consultants Inc., included as Appendix E; the Phase I Environmental Site Assessment (Phase I 2019), Prepared by ENGEO Incorporated, included as Appendix G; and the Cultural Resources Survey (CUL 2020), Prepared by JM Research & Consulting, included as Appendix C.

5.5.2 REGULATORY SETTING

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1997 to “reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program.” To accomplish this, the Act established the National Earthquake Hazards Reduction Program that provides characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. This Act designated the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns it several planning, coordinating, and reporting responsibilities. Programs under this Act provide building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which development under the proposed Project would be required to adhere.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface fault rupture to structures used for human occupancy. The main purpose of the Act is to prevent the construction of buildings for human occupancy on top of the traces of active faults. It was passed into law following the February 1971 magnitude 6.5 San Fernando (Sylmar) Earthquake that resulted in over 500 million dollars in property damage and 65 deaths. Although the Act addresses the hazards associated with surface fault rupture, it does not address other earthquake-related hazards, such as seismically induced ground shaking, liquefaction, or landslides.

This Act requires the State Geologist to establish regulatory zones, now referred to as Earthquake Fault Zones, around the mapped surface traces of active faults, and to publish appropriate maps that depict these zones. Earthquake Fault Zone maps are publicly available and distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. The Act requires local agencies to regulate development within Earthquake Fault Zones. Before a development project can be permitted within an Earthquake Fault Zone, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a minimum of 50 feet from the fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, which was passed by the California legislature in 1990, addresses earthquake hazards related to liquefaction and seismically induced landslides. Under the Act, seismic hazard zones are mapped by the State Geologist in order to assist local governments in land use planning. The Act states “it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety.” Section 2697(a) of the Act states that “cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.”

California Building Code

The California Building Code (CBC) is included in Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted across the United States. Current State law requires every city, county, and other local public agency enforcing building regulations to adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The current CBC was adopted by the City and is included in Chapter 14 of the City’s Municipal Code. These codes provide standards to protect property and public safety. They regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements, and thereby mitigate the effects of seismic shaking and adverse soil conditions. The codes also regulate grading activities, including drainage and erosion control.

California Construction General Permit

The State of California adopted a Statewide National Pollutant Discharge Elimination System (NPDES) Permit for General Construction Activity (Construction General Permit) that regulates construction site storm water management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active storm water effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity, as well as requirements for qualified professionals to prepare and implement the plan. The Construction General Permit requires the SWPPP to identify Best Management Practices (BMPs) that will be implemented to reduce soil erosion. Types of BMPs include preservation of vegetation and sediment control (e.g., fiber rolls).

City of Covina General Plan

The following policies contained in the Safety Element are relevant to the proposed Project:

Policy 1.a: Require all new and expanded or improved buildings and structures to comply with current seismic-related codes, standards, and construction practices.

Policy 1.b: Require adequate soils, geologic, and/or structural studies/evaluations prior to any building construction, particularly in the Covina Hills area, to identify appropriate, development-accommodating engineering and development siting measures.

Policy 1.i: Consider the aesthetic, historic, and/or cultural significance of a building to be upgraded for seismic safety and, to the greatest extent possible, avoid demolition or alteration of a structure's appearance or character in seismic retrofitting.

City of Covina Municipal Code

Municipal Chapter 8.50. Incorporates the requirements of the Los Angeles County Municipal NPDES Storm Water Permit [Order No. R4-2012-0175] issued by the RWQCB pursuant to Section 402(p) of the Clean Water Act.

Municipal Code Chapter 14.04. Incorporates the California Building Code; these regulations reference applicable standards and documentation requirements found in the California Building Code that address seismic safety.

Municipal Code Chapter 14.24. Incorporates minimum standards for structural seismic resistance established primarily to reduce the risk of injury and loss of life; the purpose of this chapter is to promote public safety and welfare by reducing the risk of death and injury resulting from the effects of earthquakes on unreinforced masonry buildings constructed prior to the adoption and enforcement of building codes that required earthquake-resistant design.

5.5.3 ENVIRONMENTAL SETTING

Regional Setting

The Project site is located within the Transverse Ranges Geomorphic province of California. The Transverse Ranges consist of generally east-west trending mountains and valleys, which are in contrast to the north-northwest regional trend elsewhere in the state. The structure of the Transverse Ranges is controlled by the effects of north-south compressive deformation (crustal shortening), which is attributed to convergence between the big bend of the San Andreas fault north of the San Gabriel Mountains and the motion of the Pacific Plate. The valleys and mountains of the Transverse Ranges are typically bounded by a series of east west trending, generally north dipping reverse faults with left-lateral oblique movement.

The Transverse Ranges are characterized by a very thick, nearly continuous sequence of Upper Cretaceous through Quaternary sedimentary rocks that has been deformed into a series of east-west trending folds associated with thrust and reverse faults. This deformation has created intrabasin highlands and intervening lowlands (GEO 2017).

Faults and Ground Shaking

In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the A-P Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate "Earthquake Fault Zones" along with faults that are "sufficiently active" and "well-defined." The boundary of an "Earthquake Fault Zone" is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone; therefore, there are no known active faults within or near the Project site. According to the City's Safety Element of the General Plan, there are no major earthquake faults in the City. However, the City has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. There are some faults in close enough proximity to the Project site to cause moderate to intense ground shaking during the lifetime of the proposed development. (GEO 2017). The two closest faults are: 1) the Indian Hill Fault, which runs through a portion of the northeastern section of the City approximately 1 mile to the east of the Project site; and 2) the Walnut Creek Fault, which traverses southeastern Covina along Walnut Creek approximately 2 miles southeast of the Project site (CDOC 2020).

Ground Rupture

Ground rupture occurs when movement on a fault breaks the rough to the surface. Surface rupture usually occurs along pre-existing fault traces where zones of weakness already exist. The State has established Earthquake Fault Zones for the purpose of mitigating the hazard of fault rupture by prohibiting the location of most human occupancy structures across the traces of active faults. Earthquake fault zones are regulatory zones that encompass surface traces of active faults with a potential for future surface fault rupture. The Geotechnical Report describes that the site is not located within a State established Earthquake Fault Zone; therefore, the ground rupture hazard for the site is considered to be low (GEO 2017).

Onsite Soils

The Geotechnical Report describes that the site is underlain by alluvium that consists of interbedded silty very fine to fine sand, fine to medium sand and fine to very coarse sand with gravel/rock. The subsurface exploration revealed that the northern portion of the site is underlain by 5 to 6 feet of loose alluvium. On the southern portion of the site the loose alluvium extends to depths of 10 to 12 feet. The Geotechnical Report states that the alluvium is suitable for replacement as engineered fill, provided that the materials do not contain debris or large rocks (GEO 2017).

Expansive Soils

Expansive soils are soils containing water-absorbing minerals that expand as they take in water. These soils can damage buildings due to the force they exert as they expand. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture.

As detailed previously, the Geotechnical Report describes that the Project site is underlain by alluvium material that consists of interbedded silty very fine sand to fine sand, fine to medium sand, and fine to very coarse sand with gravel/rock. These materials have a low expansion index (GEO 2017).

Groundwater

No groundwater was encountered in any of the borings drilled onsite during preparation of the Geotechnical Report. The groundwater maps from the Seismic Hazard Zone Report for the Baldwin Park 7.5 Minute Quadrangle published by the Department of Conservation Division of Mines and Geology indicate that the historic high groundwater more than 150 feet below existing ground surface (GEO 2017).

Liquefaction, Lateral Spreading, and Settlement

Liquefaction occurs when vibrations or water pressure within a mass of soil cause the soil particles to lose contact with one another. As a result, the soil behaves like a liquid, has an inability to support weight, and can flow down very gentle slopes. This condition is usually temporary and is most often caused by an earthquake vibrating water-saturated fill or unconsolidated soil. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Clayey (cohesive) soils or soils which possess clay particles in excess of 20 percent are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table.

Different phenomena associated with liquefaction are described below:

Lateral Spreading: Lateral spreading is the lateral movement of stiff, surficial blocks of sediments as a result of a subsurface layer liquefying. The lateral movements can cause ground fissures or extensional, open cracks at the surface as the blocks move toward a slope face, such as a stream bank or in the direction of a gentle slope. When the shaking stops, these isolated blocks of sediments come to rest in a place different from their original location and may be tilted.

Ground Oscillation: Ground oscillation occurs when liquefaction occurs at depth but the slopes are too gentle to permit lateral displacement. In this case, individual blocks may separate and oscillate on a liquefied layer. Sand boils and fissures are often associated with this phenomenon.

Bearing Strength Loss: Bearing strength decreases with a decrease in effective stress. Loss of bearing strength occurs when the effective stresses are reduced due to the cyclic loading caused by an earthquake. Even if the soil does not liquefy, the bearing of the soil may be reduced below its value either prior to or after the earthquake. If the bearing strength is sufficiently reduced, structures supported on the sediments can settle, tilt, or even float upward in the case of lightly loaded structures such as gas pipelines.

Ground Fissuring and Sand Boils: Ground fissuring and sand boils are surface manifestations associated with liquefaction and lateral spreading, ground oscillation and flow failure. As apparent from the above descriptions, the likelihood of ground fissures developing is high when lateral spreading, ground oscillations, and flow failure occur. Sand boils occur when the high pore water pressures are relieved by drainage to the surface along weak spots that may have been created by fissuring. As the water flows to the surface, it can carry sediments, and if the pore water pressures are high enough create a gusher (sand boils) at the point of exit.

- Sediments must be relatively young in age and must not have developed large amounts of cementation;
- Sediments must consist mainly of cohesionless sands and silts;
- The sediment must not have a high relative density;
- Free groundwater must exist in the sediment; and
- The site must be exposed to seismic events of a magnitude large enough to induce straining of soil particles.

As described previously, the Geotechnical Report did not encounter groundwater during borings on the Project site. In addition, according to the Division of Mines and Geology Seismic Hazard Evaluation of the Baldwin Park 7.5 minute Quadrangle, Seismic Hazard Zone Report, the historical high groundwater table is more than 150 feet below grade. In addition, the Geotechnical Report describes that onsite static settlement is expected to be less than 1.0-inch, while differential settlement is expected to be less than 0.5-inch. (GEO 2017).

Subsidence

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement, and occur in areas with subterranean oil, gas, or groundwater. Effects of subsidence include fissures, sinkholes, depressions, and disruption of surface drainage. However, as described in the General Plan Safety Element, the potential for area and focal ground subsidence due to earthquakes is relatively low in Covina.

Landslides

Earthquake-induced landsliding often occurs 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.

The Geotechnical Report describes that no significant slopes are present on or near the site; thus, the site is not located in an area defined by the State for earthquake-induced landslides, and the potential for earthquake-induced landsliding is considered low (GEO 2017). In addition, the Project site is in a flat developed urban area that does not contain large slopes.

Seiches and Tsunamis

A seiche is the resonant oscillation of a body of water, typically a lake or swimming pool caused by earthquake shaking (waves). The hazard exists where water can be splashed out of the body of water and impact nearby structures. The Geotechnical Report describes that there are no bodies of constant water are near the site; therefore, the hazards associated with seiches are considered low (GEO 2017).

Tsunamis are seismic sea waves generated by undersea earthquakes or landslides. When the ocean floor is offset or tilted during an earthquake, a set of waves are generated similar to the concentric waves caused by an object dropped in water. Tsunamis can have wavelengths of up to 120 miles and travel as fast as 500 miles per hour across hundreds of miles of deep ocean. Upon reaching shallow coastal waters, the once two-foot high wave can become up to 50 feet in height causing great devastation to structures within reach. Tsunamis can generate seiches as well. The Geotechnical Report further indicates that since the site is not located near the shoreline or within 50 feet of sea level that tsunami hazards are considered low (GEO 2017).

Paleontological Resources

Paleontological resources include any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include any materials associated with an archaeological resource or any cultural item defined as Native American human remains. Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

The Cultural Resource Survey describes that the Project site is mapped as being underlain by surficial sediments of alluvial gravel, sand, and silt (Qa). Soil survey data indicates that the Project site is composed of urban land composed of the Palmview-Tujunga Complex. As described in the Cultural Resource Survey, a resource records search was conducted at the Natural History Museum of Los Angeles County on October 24, 2019, which identified that the closest previously discovered fossil locality is 0.5 mile away from the Project site and recorded at 115–120 feet below ground surface. Thus, the Cultural Resource Survey determined that the Project site has a low level of sensitivity for paleontological resources (CUL 2020).

5.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- GEO-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - GEO-1i 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 4),
 - GEO-1ii Strong seismic ground shaking,
 - GEO-1iii Seismic-related ground failure, including liquefaction, or
 - GEO-1iv Landslides.
- GEO-2 Result in substantial soil erosion or the loss of topsoil;
- GEO-3 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;
- GEO-4 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;
- GEO-5 Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
- GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

The Initial Study established that the Project would result in no impact related to Thresholds GEO-1i, GEO-1iv, and GEO-5; no further assessment of these impacts is required or provided in this EIR.

5.5.5 METHODOLOGY

A Geotechnical Report was conducted for the Project site for development of Planning Areas 1 and 2 (GEO 2017), which included field exploration, exploratory soil borings, obtaining representative soil samples, laboratory testing, engineering analysis, and the review of pertinent geological literature. The laboratory testing determined the characteristics of the geology and soils that underlie the site. These subsurface conditions were then analyzed to identify potential significant impacts resulting from construction and operation of the mixed-use development in relation to geology and soils.

In determining whether a geotechnical related impact would result from the proposed Project, the analysis includes consideration of state law, including the California Building Code that is integrated into the City's Municipal Code, and implemented/verified during permitting approvals. In general, existing state law, building codes, and municipal codes that are implemented by the approving agency provide for an adequate level of safety or reduction of potential effects such that projects developed and operated to code reduce potential of impacts.

In determining whether a paleontological related impact would result from the proposed Project, the analysis includes record searches of past identified resources, consideration of the types of soils that exist within the Project site, the paleontological sensitivity of those soils, the past disturbance on the site, and the proposed

excavation. The analysis combines these factors to identify the potential the proposed construction to impact unknown paleontological resources on the site. As described in the Cultural Resource Survey, a resource records search was conducted at the Natural History Museum of Los Angeles County on October 24, 2019 to identify any previously discovered fossil localities in or near the Project site.

5.5.6 ENVIRONMENTAL IMPACTS

IMPACT GEO-1ii: THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING.

Less than Significant Impact. The proposed Project would add residents, employees, and development within the Project site. The Project site is within a seismically active region, with numerous faults capable of producing significant ground motions. As discussed above, the closest known active faults are the Indian Hill Fault, which runs through a portion of the northeastern section of the City approximately 1 mile to the east of the Project site; and the Walnut Creek Fault, which traverses southeastern Covina along Walnut Creek approximately 2 miles southeast of the Project site (USGS 2020). Therefore, the Project site is subject to seismic ground shaking. However, seismic shaking is a risk throughout southern California, and the Project site is not at greater risk of seismic activity or impacts as compared to other areas within the region.

The CBC includes provisions to reduce impacts caused by major structural failures or loss of life resulting from earthquakes or other geologic hazards. For example, Chapter 16 of the CBC contains requirements for design and construction of structures to resist loads, including earthquake loads. The CBC provides procedures for earthquake resistant structural design that include considerations for onsite soil conditions, occupancy, and the configuration of the structure including the structural system and height.

As described previously, the City of Covina has adopted the CBC as part of the Municipal Code Chapter 14.04, which regulates all building and construction projects within the City and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. Structures built in the City are required to be built in compliance with the CBC. The proposed development would be required to adhere to the provisions of the CBC as part of the building plan check and development review process. Compliance with the requirements of the CBC for structural safety would reduce hazards from strong seismic ground shaking. The Geotechnical Report provides site specific data for implementing the CBC requirements for the Project site. Because the proposed development would be required to be constructed in compliance with the CBC and the City's Municipal Code, which would be verified through the City's plan check and permitting process and is included as PPP GEO-1, the proposed Project would result in a less than significant impact related to strong seismic ground shaking.

IMPACT GEO-1iii: THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION.

Less than Significant Impact. As described previously, groundwater was not encountered in the borings on the Project site. In addition, according to the Division of Mines and Geology Seismic Hazard Evaluation of the Baldwin Park 7.5 minute Quadrangle, Seismic Hazard Zone Report, the historical high groundwater table is more than 150 feet below the ground level. Due to the lack of groundwater within 50 feet of the ground surface, liquefaction is not considered a hazard to the site (GEO 2017).

Additionally, based on these onsite soils and groundwater conditions, the Geotechnical Report determined that static settlement is expected to be less than 1.0-inch, while differential settlement is expected to be less than 0.5-inch (GEO 2017). As described previously, structures built in the City are required to be built in compliance with the CBC, as included in the City's Municipal Code as Chapter 14.04 (and in the EIR as PPP GEO-1), which regulates all building and construction within the City and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, foundations, retaining walls and site demolition.

The Geotechnical Report (GEO 2017) prepared for the Project site provides CBC seismic design criteria that are specific to the onsite soils and the potential liquefaction and settlement. Compliance with the CBC, as included as PPP GEO-1, would require proper construction of building footings and foundations so that it would withstand the effects of potential ground movement, including liquefaction and settlement. As described in Section 3.0, *Project Description*, the soils onsite would be excavated, reconditioned, and recompacted as engineered fill to support the proposed structures. The compaction of fill would be in compliance with the CBC regulations, included as PPP GEO-1. Compliance with the requirements of the CBC and City's municipal code for structural safety (included as PPP GEO-1) would reduce hazards from seismic-related ground failure, including liquefaction and settlement to a less than significant level.

IMPACT GEO-2: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL.

Less than Significant Impact. Construction of the mixed-use development on the Project site has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities that would be required for the proposed development would expose and loosen topsoil, which could be eroded by wind or water.

The City's Municipal Code Chapter 8.50 incorporates the requirements of the Los Angeles County Municipal NPDES Storm Water Permit (Order No. R4-2012-0175). All projects in the City are required to conform to the permit requirements, which includes installation of Best Management Practices (BMPs) in compliance with the NPDES permit, which establishes minimum stormwater management requirements and controls that are required to be implemented for the proposed Project. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the Regional Water Quality Control Board (RWQCB) regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP is required to identify potential sources of erosion and sedimentation loss of topsoil during construction, identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding. With compliance with the City's Municipal Code, RWQCB requirements, and the BMPs in the SWPPP, construction impacts related to erosion and loss of topsoil would be less than significant.

In addition, the proposed Project includes installation of landscaping, such that during operation of the mixed-use development, substantial areas of loose topsoil that could erode would not exist. Also, as described in Section 5.8, *Hydrology and Water Quality*, the onsite drainage features that would be installed as part of the proposed development have been designed to slow, filter, and slowly discharge stormwater into the off-site drainage system, which would also reduce the potential for stormwater to erode topsoil during operations. Furthermore, implementation of the proposed development requires City approval of a site specific Water Quality Management Plan (WQMP), which would ensure that the City's Municipal Code, RWQCB requirements, and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant.

IMPACT GEO-3: THE PROJECT WOULD NOT 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 described previously, the Project site is in a flat developed urban area that does not contain large slopes. The potential for earthquake-induced landsliding is considered low (GEO 2017). In addition, the proposed mixed-use development would not generate large slopes. Thus, impacts related to landslides would not occur.

The Geotechnical Report identifies that groundwater was not encountered in the borings on the Project site. In addition, according to the Division of Mines and Geology Seismic Hazard Evaluation of the Baldwin Park 7.5 minute Quadrangle, Seismic Hazard Zone Report, the historical high groundwater table is more than 150 feet below grade. Due to the lack of groundwater within 50 feet of the ground surface, liquefaction is not considered a hazard to the site. Likewise, lateral spreading and subsidence are not considered hazards to the site (GEO 2017) and would be less than significant.

The Geotechnical Report identified that static settlement on the site is expected to be less than 1.0-inch, while differential settlement is expected to be less than 0.5-inch (GEO 2017). As described in the previous response, the proposed construction includes excavation and recompaction of soils, and development of foundation systems in compliance with the CBC, as included as PPP GEO-1, which would require proper construction of building foundations to reduce impacts related to settlement or collapse of soils to a less than significant level.

The CBC, as included in the City's Municipal Code as Chapter 14.04, requires that a California Certified Engineering Geologist or California-licensed civil engineer provide site-specific engineering data for the proposed structures, which are reviewed by the City for appropriate inclusion as part of the building plan check and development review process. Compliance with the requirements of the CBC and City's Municipal Code for structural safety through implementation of as included as PPP GEO-1 would reduce potential impacts to a less than significant level.

IMPACT GEO-4: THE PROJECT WOULD BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994) BUT IT WOULD NOT CREATE SUBSTANTIAL RISKS TO LIFE OR PROPERTY.

Less than Significant Impact. As described previously, the Geotechnical Report describes that the Project site is underlain by alluvium material that consists of interbedded silty very fine to fine sand, fine to medium sand and fine to very coarse sand with gravel/rock. The onsite materials do not include clay and have a low expansion index (GEO 2017). The upper 5 to 6 feet of soils on the northern portion of the site the consist of loose alluvium, and on the southern portion of the site the loose alluvium extends to depths of 10 to 12 feet. The Geotechnical Report describes that all of the loose alluvium would be excavated and replaced as compacted fill pursuant to the CBC requirements, that are included in the City's Municipal Code Chapter 14.04 and implemented by PPP GEO-1. Compliance with the CBC and City's Municipal Code, per PPP GEO-1, which would be verified through the City's construction permitting process would ensure that potential impacts related to expansive soils would be less than significant.

IMPACT GEO-6: THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE.

Less than Significant Impact. As described previously, the Project site is mapped as being underlain by surficial sediments of alluvial gravel, sand, and silt (Qa) that is part of the Palmview-Tujunga Complex. Also, the Natural History Museum of Los Angeles County records search identified that the closest previously discovered fossil locality is 0.5 mile away from the Project site and recorded at 115–120 feet below ground surface, and that the area has a low level of sensitivity for paleontological resources (CUL 2020). Additionally, the Project site has been previously disturbed. The Phase I Environmental Site Assessment that was prepared for Planning Areas 1 and 2 (Phase I 2019) describes that in addition to the existing buildings, a review of historical records shows that a former railroad line was adjacent to the southern boundary of the Project site, and an orchard was onsite between approximately 1928 and circa 1960, which resulted in shallow soil disturbances. These previous disturbances have further reduced the potential of the site to contain paleontological resources.

As described in Section 3.0, *Project Description*, construction of build out of Planning Areas 1 and 2 includes excavation of 10 to 12 feet of loose alluvium that would be replaced as compacted fill. As the Cultural Resource Survey determined that the area has a low level of sensitivity, it is unlikely to yield, paleontological resources. In addition, the Cultural Resource Survey determined that shallow excavation (≤ 15 feet) in the Project site are further unlikely to impact paleontological resources. Therefore, impacts related to paleontological resources from excavation and compaction of soils during implementation of the proposed Project would be less than significant.

5.5.7 CUMULATIVE IMPACTS

The potential cumulative exposure of people or structures to unstable geologic units and/or expansive soils that have the potential to result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, movement, or collapse tend to be region wide in nature, even though each site-specific development has unique geologic considerations. Site-specific development projects within Covina are subject to uniform site-development policies and construction standards imposed by the City that are based on the state requirements in the CBC and site-specific geotechnical studies prepared to define site-specific conditions that might pose a risk to safety, such as those described previously for the proposed Project. While increases in the number of people and structures subject to unstable geologic units and soils would increase in the Covina area with cumulative development, given the application of CBC requirements by the City through the construction permitting process, the cumulative effects of development related to unstable geologic units and/or expansive soils; including landslides, lateral spreading, subsidence, liquefaction, movement, or collapse would be less than significant.

Paleontological Resources: The Project site is within an area of low paleontological sensitivity and has been previously disturbed. The proposed Project is not anticipated to impact any paleontological resources. Similarly, because the closest previously discovered fossil locality is 0.5 mile away from the Project site and recorded at 115–120 feet below ground surface, other developments are also unlikely to impact paleontological resources. Therefore, both the proposed Project and cumulative projects are not anticipated to result in impacts that could cumulatively combine. Therefore, impacts would be less than cumulatively significant.

5.5.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in the City's Municipal Code as Chapter 14.04, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for proposed development on the Project site shall be incorporated into grading plans and building specifications as a condition of construction permit approval.

5.5.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements impacts would be less than significant.

5.5.10 MITIGATION MEASURES

No mitigation measures are required.

5.5.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with existing regulatory programs would reduce potential impacts associated with potential geotechnical hazards and unique paleontological resource impacts to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to geology and soils and paleontological resources would occur.

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5.6 Greenhouse Gas Emissions

5.6.1 INTRODUCTION

This section evaluates the potential for implementation of the proposed Specific Plan to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG emissions, impacts of the proposed Project are considered on a cumulative basis. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). This section also addresses the Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing the emissions of GHGs. This section includes data from the Greenhouse Gas Analysis (GHG 2020), Prepared by Urban Crossroads, included as Appendix F.

5.6.2 REGULATORY SETTING

National Climate Action Plan

In June 2013, President Obama enacted a national Climate Action Plan (CAP) that consisted of a wide variety of executive actions and had three pillars discussed below.

- **Cut Carbon in America:** The CAP consists of actions to help cut carbon by deploying clean energy such as cutting carbon from power plants, promoting renewable energy, and unlocking long-term investment in clean energy innovation.
- **Prepare the United States for Impacts of Climate Change:** The CAP consists of actions to help prepare for the impacts of climate change through building stronger and safer communities and infrastructure by supporting climate resilient investments and supporting communities as they prepare for impacts, and boosting resilience of building and infrastructure; protecting the economy and natural resources by identifying vulnerabilities, promoting insurance leadership, conserving land and water resources, managing drought, reducing wildfire risks, and preparing for future floods; and using sound science to manage climate impacts.
- **Lead International Efforts:** The CAP consists of actions to help the United States lead international efforts through working with other countries to take action by enhancing multilateral engagements with major economies, expanding bilateral cooperation among major emerging economies, combating short-lived climate pollutants, reducing deforestation and degradation, expanding clean energy use and cutting energy waste, promoting global free trade in environmental goods and services, phasing out subsidies that encourage wasteful use of fossil fuels, and by leading efforts to address climate change through international negotiations.

California Assembly Bill 1493 – Pavley

In 2002, the California legislature adopted regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year. In September 2009, CARB adopted amendments to the Pavley regulations to reduce GHG from 2009 to 2016. CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was established by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

California Assembly Bill 32 - Global Warming Solutions Act of 2006

In furtherance of the goals established in Executive Order S-3-05, the legislature enacted AB 32 to mandate the quantification and reduction of GHGs to 1990 levels by the year 2020. The law establishes periodic targets for reductions and requires certain facilities to report emissions of GHGs annually. The legislation authorizes CARB to reduce emissions from certain sectors that contribute the most to statewide emissions of GHGs.

Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. Also, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

The first action under AB 32 resulted in the adoption of a report listing early action GHG emission reduction measures on June 21, 2007. The early actions include three specific GHG control rules. On October 25, 2007, CARB approved an additional six early action GHG reduction measures under AB 32. The three-original early-action regulations meeting the narrow legal definition of “discrete early action GHG reduction measures” include:

- A low-carbon fuel standard to reduce the “carbon intensity” of California fuels.
- Reduction of refrigerant losses from motor vehicle air conditioning system maintenance to restrict the sale of “do-it-yourself” automotive refrigerants.
- Increased methane capture from landfills to require broader use of state-of-the-art methane capture technologies.

The additional six early-action regulations, which were also considered “discrete early action GHG reduction measures,” consist of:

- Reduction of aerodynamic drag, and thereby fuel consumption, from existing trucks and trailers through retrofit technology.
- Reduction of auxiliary engine emissions of docked ships by requiring port electrification.
- Reduction of PFCs from the semiconductor industry.
- Reduction of propellants in consumer products (e.g., aerosols, tire inflators, and dust removal products).
- Requirements that all tune-up, smog check, and oil change mechanics ensure proper tire inflation as part of overall service in order to maintain fuel efficiency.

- Restriction on the use of SF₆ from non-electricity sectors if viable alternatives are available.

As required under AB 32, on December 6, 2007, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was set at 427 MTCO₂E. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory reporting of GHGs for large facilities that account for 94 percent of GHG emissions from industrial and commercial stationary sources in California. About 800 separate sources fall under the new reporting rules and include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and other industrial sources that emit CO₂ in excess of specified thresholds.

On December 11, 2008, CARB approved the Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan; CARB 2008) to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent.
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions.
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets.
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS).
- Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions because local governments have the primary authority to plan, zone, approve, and permit development to accommodate population growth and the changing needs of their jurisdictions. The Scoping Plan also relies on the requirements of Senate Bill (SB) 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track to achieve the 2020 GHG reduction goal. In 2014, CARB released the First Update to the Scoping Plan, which builds upon the Initial Scoping Plan with new strategies and recommendations. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. This update defines CARB's climate change priorities for the next five years and sets the groundwork to reach long-term goals set forth in Executive Order S-3-05. The update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals in the original 2008 Scoping Plan. It also evaluates how to align the state's "longer-term"

GHG reduction strategies with other state policy priorities for water, waste, natural resources, clean energy, transportation, and land use.

On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update would reflect the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The proposed Second Update is undergoing a review period and has not yet been adopted.

Senate Bill 375

In August 2008, the legislature passed, and on September 30, 2008, Governor Schwarzenegger signed, SB 375 (Steinberg), which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375 provides incentives for streamlining CEQA requirements by substantially reducing the requirements for "transit priority projects," as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40 percent below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all state agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the state's 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor's Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C - the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

Title 24 Energy Efficiency Standards and California Green Building Standards

The 2019 California Code of Regulations Title 24 Part 6 (CalGreen) became effective on January 1, 2020. The new standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources. CEC indicates that these Title 24 standards will reduce energy consumption by 7 percent for

residential buildings and 30 percent for nonresidential buildings compared to the 2016 Title 24 requirements (CEC 2019).

The 2019 CALGreen standards that are applicable to the Project include the following:

- Short-term bicycle parking. Provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack.
- Long-term bicycle parking. Provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.
- Installation of bicycle racks inside garages. The Project includes installation of two (2) wall or ceiling mounted bicycle racks inside each residential garage.
- Designated parking for clean air vehicles. Provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles.
- Electric vehicle charging stations. New construction shall facilitate the future installation of electric vehicle supply equipment.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare CALGreen ratings.
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste.
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush.
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush. The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush.
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi. When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi.
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi. Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi. Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute. Metering faucets shall not deliver more than 0.20 gallons per cycle. Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle.
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent.

- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day.
- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit.
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements.

The 2019 CalGreen Building Standards Code has been adopted by reference in the City's Municipal Code in Section 14.02.010(N).

City of Covina General Plan

The General Plan Natural Resources and Open Space Element includes goals, policies, and objectives that support the reduction of GHGs. The existing Natural Resources and Open Space Element goals, objectives, and policies relevant to the proposed Project include:

Policy 1.o: Comply with applicable portions of Federal, State, regional, and County plans and programs pertaining to air pollution mitigation/air quality enhancement by following, in a manner that recognizes local needs, issues, views, and policy and financial constraints, various vehicular emissions-reducing and traffic congestion-reducing land use and transportation control and energy conservation measures, proposals, and policies outlined in the Land Use and Circulation Elements, to the greatest extent feasible and practical.

Policy 1.p: Encourage and support the use of mass transit, whenever possible, and work with transit operators to provide the best, most efficient service for local residents and businesses to reduce vehicular travel and air pollution.

Policy 1.r: Encourage bikeways, where feasible, to provide an alternative mode of transportation.

Policy 1.t: Preclude the development of land uses and land use practices that would contribute significantly to air quality degradation.

Policy 1.u: Encourage and, where necessary, require the incorporation of energy conservation features in the design of all new and significantly expanded/remodeled private and public developments and encourage the installation of conservation devices in existing developments to increase energy efficiency and decrease pollution emissions from off-site electrical power plants and on-site natural gas use.

Policy 1.v: Maintain all recycling programs to encourage the reuse of recyclable materials.

City of Covina Energy Action Plan

The City of Covina has implemented an Energy Action Plan that summarizes the City's existing and future energy uses, projects City's future energy use, through 2023, which identifies energy efficiency goals and targets, and creates a strategy to meet the City and State energy and GHG reduction goals. The Energy Action Plan sets the following energy efficiency targets:

- Reduce existing residential electricity use 5 percent below baseline 2018 levels by 2023.
- Reduce gas usage by 5 percent below baseline 2018 levels by 2023.
- Complete three energy efficiency projects by 2023.

In addition, the Energy Action Plan includes goals and policies to provide for efficient energy consumption. The goals and policies relevant to the proposed Project include the following:

Goal 1: Maximize energy efficiency at existing City facilities and infrastructure.

Policy 1.2: Enhance the energy efficiency of City buildings and structures through retrofits.

Policy 1.5: Become a water conservation leader in the San Gabriel Valley and lead other municipalities by example.

Policy 1.6: Incorporate energy efficiency as a key element in designing and building new City structures and facilities.

Goal 2: Ensure that energy efficiency practices are incorporated into municipal operations.

Policy 2.1: Work with the City Council to include energy efficiency updates and topics when updating the City's General Plan, codes, policies, and Strategic Plan.

5.6.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are causing global climate change. 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 principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO₂e. Large emission sources are reported in million metric tons (MMT) of CO₂e. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide: Carbon dioxide (CO₂) is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.

Methane: Methane (CH₄) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide: Nitrous oxide (N₂O) (laughing gas) is a colorless GHG that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride: Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

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 drought years (CARB, 2009). 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:

- 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.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

Statewide GHG emissions have generally decreased over the last decade, with 2016 levels (429 million MTCO_{2e}) approximately 11 percent less than 2005 levels (486 million MTCO_{2e}) and below the State's 2020 reduction target of 431 million MTCO_{2e}. The transportation sector (165 million MTCO_{2e}) accounted for more than one-third (approximately 39.4%) of the State's total GHG emissions inventory (429 million MTCO_{2e}) in 2016 (CARB 2018).

Existing Specific Plan Area Conditions

The Specific Plan area is developed with approximately 110,542 square feet of various commercial and residential uses, associated parking lots, and landscaping. The sources of GHG emissions related to existing uses onsite includes: natural gas used for heating and hot water, electricity usage, vehicle trips, use of landscaping equipment, use of consumer cleaning products, water demand, wastewater generation, and solid waste generation.

5.6.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines indicates that a project could have a significant effect if it were to:

- GHG-1 Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- GHG-2 Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document – *Interim CEQA Greenhouse Gas Significance Threshold*, that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - All land use types: 3,000 MTCO_{2e} per year
 - Based on land use type:
 - Residential: 3,500 MTCO_{2e} per year
 - Commercial: 1,400 MTCO_{2e} per year
 - Mixed use: 3,000 MTCO_{2e} per year
- Tier 4 has the following options:
 - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
 - Option 3: For plan-level analyses, analyze a project's emissions against an efficiency value of 6.6 MTCO_{2e}/yr/service population by 2020 and 4.1 MTCO_{2e}/yr/service population by 2035. For project-level analyses, analyze a project's emissions against an efficiency value of 4.8 and 3.0 MTCO_{2e}/yr/service population for the 2020 and 2035 calendar years, respectively.

The City of Covina has not adopted a threshold of significance for GHG emissions. Thus, based on guidance from the SCAQMD, if the Project would emit stationary source GHGs less than 3,000 MTCO_{2e}/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if the Project would emit stationary source GHGs in excess of 3,000 MTCO_{2e}/yr, then it could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation.

5.6.1 METHODOLOGY

The California Emissions Estimator Model (CalEEMod) v2016.3.2 is the most recent version and has been used to determine construction and operational GHG emissions from the proposed Project. The purpose of this model is to calculate construction-source and operational-source GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures, if applied. Construction emissions are quantified and per SCAQMD methodology, the total GHG emissions for

construction activities are divided by 30-years, and then added to the annual operational phase of GHG emissions.

In addition, CEQA requires the lead agency consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, this section addresses whether the proposed Project complies with various programs and measures designed to reduce GHG emissions. There is no statewide program or regional program or plan that has been adopted with which all new development must comply; thus, this analysis has identified the most relevant to the City of Covina and the proposed Project.

5.6.2 ENVIRONMENTAL IMPACTS

IMPACT GHG-1: THE PROJECT WOULD NOT GENERATE GHG EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.

Less than Significant Impact.

Construction

As described in Section 3.0, *Project Description*, construction of the proposed development within Planning Areas 1 and 2 is anticipated to last approximately 15-months. The construction-related activities involve the following: demolition, site preparation, grading, building construction, paving, and architectural coatings. These construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips. Total estimated construction related GHG emissions were amortized over 30 years per SCAQMD methodology, and as shown on Table 5.6-1 would equal approximately 25.15 MTCO₂e per year.

Table 5.6-1: Amortized Construction Greenhouse Gas Emissions

Year	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
2022	671.76	0.14	0.00	675.33
2023	78.84	0.02	0.00	79.28
Total Annual Construction Emissions	750.61	0.16	0.00	754.61
Amortized Construction Emissions (MTCO₂e)	25.02	0.01	0.00	25.15

Source: Urban Crossroads, 2020.

Operation

Operation of the proposed Project at buildout would generate GHG emissions from vehicle trips, electricity and natural gas consumption, landscape maintenance equipment, water and wastewater transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the new development would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. GHG emissions from solid waste disposal is associated with the anaerobic breakdown of material.

The estimated operational GHG emissions that would be generated from operation of the proposed Project are shown in Table 5.6-2. As shown, the new development and vehicular usage that would occur from implementation of the proposed Project in addition to the amortized construction emissions would generate

approximately 1,690.36 MTCO₂e per year, which would be less than the threshold of 3,000 MTCO₂e/yr. Therefore, impacts related to GHG emissions would be less than significant.

Table 5.6-2: Summary of Greenhouse Gas Emissions (Annual)

Emission Source	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	25.02	0.01	0.00	25.15
Area Source	33.92	2.74E-03	5.80E-04	34.16
Energy Source	280.50	9.73E-03	3.21E-03	281.70
Mobile Source	1,222.43	0.09	0.00	1,224.57
Waste Source	16.63	0.98	0.00	41.21
Water Usage	71.99	0.36	8.94E-03	83.56
Total CO₂e (All Sources)	1,690.36			

Source: Urban Crossroads, 2020.

IMPACT GHG-2: THE PROJECT WOULD NOT CONFLICT WITH ANY APPLICABLE PLAN, POLICY OR REGULATION OF AN AGENCY ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSION OF GHGS.

Less than Significant Impact. The proposed Project consists of an infill redevelopment project that would help to meet housing demands and needs for commercial/office uses from projected growth in the region, which has the potential to reduce GHG emissions from the reduction of Vehicle Miles Traveled (VMT). The proposed Project provides for pedestrian infrastructure, such as sidewalks that connect to off-site sidewalks to promote non-vehicular transportation and reduce VMT and related GHG emissions. In addition, the Project site is adjacent to existing bus routes and bicycle lanes. Providing a mixed-use development in such a location is consistent with the intent of the AB 32 Scoping Plan and SB 375, which is focused on changing land use patterns and improving transportation alternatives. Furthermore, as described in Section 5.13, *Transportation*, the proposed Project would result in a less than significant VMT impact because the Project site is located within a high quality transit corridor, would result in a FAR higher than 0.75, does not include parking beyond City requirements; and is consistent with the regional Sustainable Communities Strategy.

As described previously, the CARB Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32. The CARB Scoping Plan recommendations serve as statewide measures to reduce GHG emissions levels. The proposed Project would be consistent with the applicable measures established in the Scoping Plan, as shown in Table 5.6-3.

Table 5.6-3: Specific Plan Consistency with CARB Scoping Plan

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. The Project area uses energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.

Action	Responsible Parties	Consistency
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.		Consistent. The new development implemented by the Project would be designed and constructed to implement the energy efficiency measures. The Project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) 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.		Consistent. The new development would be designed and constructed to implement the Title 24 (CalGreen) Standards.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EV by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty EV by 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% 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 _x standard.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NO _x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.

Action	Responsible Parties	Consistency
California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		
Further reduce vehicle miles traveled (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.”		Consistent. The Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).
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.).	CalSTA, SGC, OPR, CARB, Governor’s Office of Business and Economic Development (GO- Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
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).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
Implement California Sustainable Freight Action Plan		

Action	Responsible Parties	Consistency
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to improve freight system efficiency.
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.		Consistent. The Project would not obstruct or interfere with agency efforts to 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.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Consistent. These are not emission related to the proposed Project. Hence, the proposed Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Consistent. The new development would be required through City permitting to implement waste reduction and recycling measures consistent with State and City requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLCP and SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The Project is not applicable to implementation of Cap-and-Trade Program provisions. Thus, the Project would not obstruct or interfere implementation the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		

Action	Responsible Parties	Consistency
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Consistent. The Project site is urban and does not include, or adjacent to, conservation easements. Thus, the Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Consistent. The Project provides for infill and redevelopment of an urban area. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Consistent. Where appropriate, new development would incorporate wood or wood products. The Project would not obstruct or interfere agency efforts to encourage use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan		Consistent. The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Consistent. The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Consistent. The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Consistent. The Project would not obstruct or interfere agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

Source: Urban Crossroads, 2020.

As described previously, the City of Covina has implemented an Energy Action Plan that identifies energy efficiency targets and includes goals and policies to provide for efficient energy consumption. The proposed

Project would be consistent with the applicable goals and policies in the Energy Action Plan, as shown in Table 5.6-4.

Table 5.6-4: Specific Plan Consistency with Covina Energy Action Plan

Goal/Policy	Consistency
Goal 1: Maximize energy efficiency at existing City facilities and infrastructure.	Consistent. The Project is not related to existing City owned facilities; however, the Project would maximize energy efficiency at the existing Covina Bowl building by including electrical and plumbing fixtures that are compliant with CALGreen standards in the adaptive reuse of the existing building.
Policy 1.2: Enhance the energy efficiency of City buildings and structures through retrofits.	Consistent. As described in the previous response, the Project is not related to existing City owned facilities; however, the Project would enhance energy efficiency at the existing Covina Bowl building by including electrical and plumbing fixtures that are compliant with CALGreen standards in the adaptive reuse of the existing building.
Policy 1.5: Become a water conservation leader in the San Gabriel Valley and lead other municipalities by example.	Consistent. The Project would implement water conservation by installing plumbing and irrigation fixtures that are compliant with CALGreen standards and by installing drought tolerant landscaping, which would enhance water conservation in the City.
Policy 1.6: Incorporate energy efficiency as a key element in designing and building new City structures and facilities.	Consistent. As described previously, the Project is not related to City owned facilities; however, the Project would incorporate energy efficiency by including electrical, plumbing, and irrigation fixtures that are compliant with CALGreen standards. In addition, drought tolerant landscaping would be installed, which would incorporate reduced need for water supplies that would reduce energy needed for water transportation.
Goal 2: Ensure that energy efficiency practices are incorporated into municipal operations.	Consistent. The Project is not related to municipal operations; however, the Project would implement energy efficiency by including electrical, plumbing, and irrigation fixtures that are compliant with CALGreen standards. In addition, drought tolerant landscaping would be installed for conservation.
Policy 2.1: Work with the City Council to include energy efficiency updates and topics when updating the City's General Plan, codes, policies, and Strategic Plan.	Consistent. The proposed Specific Plan includes green building and sustainable design guidelines to reduce energy demand and promote resource conservation.

The proposed development would be implemented pursuant to the CALGreen Building (Title 24) requirements that are included in the City's Municipal Code Section 14.02.010(N). The City's administration of the Title 24 requirements includes review of proposed energy conservation measures during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, the Project would be implementing regulations that reduce GHG emissions.

The CARB Scoping Plan reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. The CARB Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32. As detailed in Table 5.6-3, the proposed Project would not conflict with the CARB Scoping Plan.

Overall, implementation of the proposed Project would not result in conflict with any applicable plan, policy, or regulation that was adopted for the purpose of reducing GHGs. Thus, impacts would be less than significant.

5.6.7 CUMULATIVE IMPACTS

GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the state's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006 (Nunez), recognizes that California is the source of substantial amounts of GHG emissions. The statute begins with several legislative findings and declarations of intent, including the following:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems" (California Health and Safety Code, Section 38501 (a)).

Thus, AB 32 recognizes the significance of the statewide cumulative impact of GHG emissions from sources throughout the state and sets a performance standard for mitigation of that cumulative impact.

The analysis of GHG emission impacts under CEQA contained in this EIR effectively constitutes an analysis of a project's contribution to the significant cumulative impact of GHG emissions. As described previously, the estimated GHG emissions from construction and operation of the proposed Project would be lower than the threshold of 3,000 MTCO₂e. Therefore, the Project would not result in a cumulatively considerable impact related to GHG emissions, and cumulative impacts would be less than significant.

5.6.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

The following requirements would reduce impacts related to GHG emissions.

- California Assembly Bill 1493 (Pavley)
- California Executive Order S-3-05

- Assembly Bill 32 (Global Warming Solutions Act of 2006)
- Senate Bill 375 (Steinberg)
- California Executive Order B-30-15
- California Energy Code
- California Green Building Standards Code
- City of Covina Energy Action Plan

5.6.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts GHG-1 and GHG-2 would be less than significant.

5.6.10 MITIGATION MEASURES

No mitigation measures are required.

5.6.3 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The existing regulatory programs listed above, would reduce potential impacts associated with GHG emissions to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to GHG emissions would occur.

REFERENCES

California Energy Commission. 2019. Title 24 Building Energy Standards. Accessed: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>

California Air Resources Board. 2018. California Greenhouse Gas Inventory – 2018 Edition. Accessed: <http://www.arb.ca.gov/cc/inventory/data/data.htm>.

City of Covina Energy Action Plan. 2019. Accessed at: <https://covina.ca.gov/publicworks/page/energy-action-plan>

Greenhouse Gas Analysis. Prepared by Urban Crossroads (GHG 2020). Appendix F.

5.7 Hazards and Hazardous Materials

5.7.1 INTRODUCTION

This section considers the nature and range of foreseeable hazardous materials and physical hazards/impacts that would result from implementation of the proposed Project. It identifies the ways that hazardous materials and other types of hazards could expose people and the environment to various health and safety risks during construction activities and operation of proposed Project.

This section also describes routine hazardous materials that are likely to be used, handled, or processed within the Project site, and the potential for upset and accident conditions in which hazardous materials could be released. The impact analysis identifies ways in which hazardous materials might be routinely used, stored, handled, processed, or transported, and evaluates the extent to which existing and future populations could be exposed to hazardous materials.

The term “hazardous material” is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.¹

This section includes data from the Phase I Environmental Site Assessment (Phase I 2019), Prepared by ENGEO Incorporated, included as Appendix G; and the Limited Phase II Environmental Site Assessment (Phase II 2019), Prepared by ENGEO Incorporated, included as in Appendix H.

5.7.2 REGULATORY SETTING

Hazardous Materials Management

The primary federal agencies responsible for hazardous materials management include the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Labor Occupational Safety and Health Administration (OSHA).

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, the USEPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a “cradle to grave” manner. RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources.

The Hazardous and Solid Waste Amendments of 1984 both expanded the scope of RCRA and increased the level of detail in many of its provisions, reaffirming the regulation from generation to disposal and to prohibiting the use of certain techniques for hazardous waste disposal. The USEPA has largely delegated responsibility for implementing the RCRA program in California to the State, which implements this program through the California Hazardous Waste Control Law.

¹ State of California, Health and Safety Code, Chapter 6.95, Section 25501(o).

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows the USEPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 CFR Part 141, gives the USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the Project area, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows the USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Occupational Safety and Health Act of 1970

Federal and state occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by OSHA. Title 29 of the Code of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of material safety data sheets (MSDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR Part 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Adherence to applicable hazard-specific OSHA standards are required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 with regard to worker exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport. Title 42, Part 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of the US Department of Transportation (USDOT). The Hazardous Materials Transportation Act provides USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The Hazardous Materials Transportation Act governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. The Research and Special Programs Administration carries out these responsibilities by prescribing regulations and managing a user-funded grant program for planning and training grants for states and Indian tribes. USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or are involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational

standards, and highway routing. Additionally, USDOT is responsible for developing curriculum to train for emergency response and administers grants to states and Indian tribes for ensuring the proper training of emergency responders. Hazardous Materials Transportation Act was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

Hazardous Materials Management and Waste Handling

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary state agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and State hazardous waste laws.

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws and regulations are overseen by a variety of state and local agencies. The California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

The primary local agency, known as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management is the Los Angeles County Health Department, Environmental Health Division. The Unified Program is the consolidation of six state environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by Cal-EPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (CalARP)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures (SPCC) requirements)
- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

As the CUPA for the County of Los Angeles, the Los Angeles County Health Department, Environmental Health Division maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, Los Angeles County has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety. A Participating Agency (PA) is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. The City of Los Angeles Fire Department (LAFD) is a PA with the Los Angeles County Health Department, Environmental Health Division as the CUPA. The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically,

businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal Resource Conservation and Recovery Act (RCRA). California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- Included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.
- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center for public and private use dealing with all aspects of hazardous waste management.

California Government Code Section 65962.5 (a), Cortese List

The Hazardous Waste and Substance Sites List (Cortese List) is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Title 22 of the California Code of Regulations and Hazardous Waste Control Law, Chapter 6.5

The Department of Toxic Substances Control regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle-to-grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies.

Title 27 of the California Code of Regulations, Solid Waste

Title 27 of the California Code of Regulations contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the State and which therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local

Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or “Chisels”) are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Occupational Safety: Title 8 – CalOSHA

CalOSHA administers federal occupational safety requirements and additional state requirements in accordance with California Code of Regulations Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under CCR Title 8, Section 1532.1, Lead, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the proposed Project due to the potential hazards posed by onsite construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government, and private agencies. The plan is administered by the California Emergency Management Agency and includes response to hazardous materials incidents. The California Emergency Management Agency coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, Regional Water Quality Control Board, South Coast Air Quality Management District, County Fire Department, and the County Health Department.

South Coast Air Quality Management District Rule 1403

SCAQMD Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices to minimize asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of asbestos containing materials. The requirements for demolition and renovation activities include asbestos surveying, notification, asbestos containing materials removal procedures and time schedules, handling and cleanup procedures, storage, and disposal requirements for asbestos containing waste materials.

California Emergency Services Act

The California Emergency Services Act (Government Code Section 8550 et seq.) was adopted to establish the State’s roles and responsibilities during human-made or natural emergencies that result in conditions of

disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

City of Covina Emergency Plan

The City of Covina Emergency Plan serves as the community's chief guidebook for emergency preparedness planning and for comprehensively managing any type of major emergency, which is defined as "a situation that requires immediate action beyond the scope of normal City operations." According to the Emergency Plan, its purposes are as follows:

1. To answer, during emergencies, who is in charge, what should be done, and by whom;
2. To provide for the continuity of government during emergencies;
3. To facilitate public understanding of Covina emergency organization;
4. To provide guidance for disaster education and training; and
5. To provide references to additional, more detailed information.

The disaster response is directed from the City's Emergency Operating Center (EOC). The EOC is designated as the Fire and Police Department complex at 400 to 444 North Citrus Avenue, with alternate facilities identified if the primary location is unusable. Although the Emergency Plan is designed so that any trained person can step in and follow the action checklists, the position of Director of Emergency Services oversees the EOC. This position is filled by the City Manager, Fire Chief, Police Chief, or City employee with the highest degree of expertise in the type of emergency at hand.

City of Covina General Plan

City policies pertaining to hazards and hazardous materials are contained in the Safety Element of the General Plan. The existing General Plan goals and policies that are relevant to the Project include the following:

Safety Element

Policy Area 4: Hazardous Materials. The City shall:

- Policy a:** Continue to cooperate with all applicable laws and agencies concerning the regulation of the use, storage, and disposal of hazardous materials by following this Safety Element and related documents, mandates, and matters.
- Policy i:** Continue to cooperate with all applicable laws, particularly the Clean Water Act, and agencies concerning the regulation of discharges or prohibition of all wastes and non-storm water materials disposed into the public storm drainage system by implementing the National Pollutant Discharge Elimination System (NPDES)- related storm water/urban runoff management program.
- Policy k:** Put an emphasis on cumulative storm water impacts and the need to mitigate cumulative impacts to less than significant levels.
- Policy l:** Maximize, to the greatest extent practicable, the percentage of permeable surfaces to allow more percolation of storm water runoff into the ground.
- Policy m:** Minimize, to the greatest extent practicable, the amount of storm water directed to impermeable areas and to the storm drainage system.

- Policy o:** Build storm water pollution prevention requirements into other existing requirements (e.g., landscaping) to ensure that requirements do not themselves indirectly encourage practices that can cause pollution.
- Policy p:** Require proposed commercial and industrial Projects/activities to be conditioned to comply with California's general storm water permits and with the Clean Water Act.
- Policy q:** Require erosion and sediment controls for developments to minimize erosion-related damages and the spillover of sediments to adjacent sites.
- Policy s:** Consider to require proposed Projects to be conditioned with appropriate permanent controls to reduce storm water pollutant loads discharged from development sites (including parking lots), to the maximum extent practicable.

5.7.3 ENVIRONMENTAL SETTING

The existing buildings within Planning Areas 1 and 2, which are the areas in which Project related construction would occur, were developed in the 1950s. The buildings have been occupied by church, pre-school, bowling alley, restaurant, salon, office, and retail uses that do not involve use of acute hazardous materials. In addition, a review of historical records indicates that a former railroad line was adjacent to the southern boundary of the property until circa 1950, and an orchard was onsite between approximately 1928 and circa 1960 (Phase II 2019).

Previous Railroad Line and Agricultural Use

The Limited Phase II ESA (Phase II 2019) describes that a railroad line previously existed along the southern boundary of the site until circa 1950. The Limited Phase II ESA describes that vegetation inhibitor chemicals (i.e., herbicides) were applied along railroad lines, and often contained elevated levels of metals such as lead and arsenic. Therefore, a potential presence of elevated metals along the previous railroad alignment was identified. The Limited Phase II ESA also describes that the site was used as an orchard from at least 1928 through circa 1960. As a result, potential pesticides and/or herbicides may have been used on the site.

Therefore, the Limited Phase II ESA conducted soils testing and compared the laboratory test results to the US Environmental Protection Agency USEPA and CAL-EPA /Department of Toxic Substances Control (DTSC) residential screening levels. The test results showed that TPH-diesel, TPH-motor oil, and organochlorine pesticide concentrations were non-detectable; concentration of lead were below the screening level; the maximum concentration of arsenic were within the expected background concentration for arsenic in Southern California; and the remaining metal concentrations were below the corresponding screening levels. Overall, the testing results show that the site soils meet residential development standards (Phase II 2019).

Asbestos

Asbestos is a naturally occurring fibrous material that was used as a fireproofing and insulating agent in building construction before such uses were banned by the USEPA in the 1970s, although some nonfriable² use of asbestos in roofing materials still exists. The presence of asbestos can be found in materials such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, floor backing, and many other building materials. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this

² Nonfriable asbestos refers to ACMs that contain asbestos fibers in a solid matrix that does not allow for them to be easily released.

regulation. All thermal system insulation), surfacing material, and asphalt/vinyl flooring that are present in a building constructed prior to 1981 and have not been appropriately tested are “presumed asbestos-containing material”.

Asbestos and asbestos-containing materials (ACMs) are considered both a hazardous air pollutant and a human health hazard. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when ACMs are disturbed during such activities as demolition and renovation. The buildings within the Project site were constructed before 1981 when asbestos containing materials were commonly used and the Phase I identified that asbestos containing material are possible on the site (Phase I 2019).

Lead

In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06 percent by weight in a dry film of newly applied paint. In the 1970s, the chief concern for lead-based paint was its cumulative effect on body systems, primarily when paint chips containing lead were ingested by children. Research in the early 1980s showed that lead dust is of special concern because the smaller particles are more easily absorbed by the body. Common methods of paint removal, such as sanding, scraping, and burning, create excessive amounts of dust. Lead dust is especially hazardous to young children because they play on the floor and engage in a great deal of hand-to-mouth activity, increasing their potential for exposure. Due to the age of the onsite buildings, it is possible that lead-based paint and other lead containing materials are present in the buildings on the Project site (Phase I 2019).

5.7.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- | | |
|-------|--|
| HAZ-1 | Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials; |
| HAZ-2 | Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment; |
| HAZ-3 | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school; |
| HAZ-4 | Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment; |
| HAZ-5 | Result in a safety hazard or excessive noise for people residing or working in the Project area for a Project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport; |
| HAZ-6 | Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or |
| HAZ-7 | Expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. |

The Initial Study established that the Project would result in no impacts related to Thresholds HAZ-4, HAZ-5, and HAZ-7, and less than significant impacts related to Thresholds HAZ-3 and HAZ-6. No further assessment of these impacts is required in this EIR.

5.7.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hazards and hazardous materials considers both direct effects to the resource and indirect effects in a local or regional context. Potentially significant impacts would generally result in the loss or degradation of public health and safety or conflict with local, state, or federal agency regulations. Information for this section was obtained, in part, from the Phase I and the Limited Phase II Environmental Site Assessment Reports (Appendix H).

5.7.6 ENVIRONMENTAL IMPACTS

IMPACT HAZ-1: THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE OR DISPOSAL OF HAZARDOUS MATERIALS.

Less than Significant Impact. Implementation of the proposed Project would result in an increase in development intensity within the Project site. New uses proposed include residential, commercial/office mixed-uses. Exposure of the public or the environment to hazardous materials could occur by improper handling or use of hazardous materials or hazardous wastes; transportation accident; environmentally unsound disposal methods; or fire, explosion or other emergencies. The severity of potential effects varies with the activity conducted, the amount, concentration of and type of hazardous material or wastes present, and the proximity of sensitive receptors.

The types and amounts of hazardous materials generated or used within the Project site vary according to the nature of the activity at individual development sites. Hazardous materials associated with the existing and proposed residential, commercial, and office uses within the Project site consist mostly of typical cleaning products, maintenance products (e.g., paints and solvents), oils, lubricants and refrigerants, associated with building mechanical and HVAC systems; and grounds and landscape maintenance products formulated with hazardous substances, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides.

The proposed residential and commercial/office uses within the Project site are not expected to introduce any unusual or substantial volumes of hazardous materials to the area. However, should the use and/or storage of hazardous materials at individual development sites rise to a level subject to regulation, those uses would be required to comply with federal, State, and local regulations (listed above) to eliminate or reduce the consequence of hazardous materials accidents during their routine use.

Construction

The construction activities related to redevelopment of the Planning Areas would involve routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by county, state and federal regulations, which all construction activities in the City are required to strictly adhere to. As a result, the routine use and disposal of hazardous materials during construction would be less than significant.

The Phase I Environmental Site Assessment determined that asbestos-containing materials and lead-based paint may exist due to the date of construction of the existing buildings. Therefore, asbestos and lead surveys and abatement would be required prior to demolition and adaptive reuse of the existing buildings pursuant to the existing South Coast Air Quality Management District (SCAQMD), Cal/OSHA, and the sections of the California Health and Safety Code, which are described above in the Regulatory Setting. These requirements

were developed to protect human health and the environment from the hazards associated with exposure to lead based materials and airborne asbestos fibers. Compliance with these existing regulations, as ensured through the permitting process and included as PPP HAZ-1 and PPP HAZ-2, would reduce impacts related to routine transport and disposal of asbestos-containing materials and lead-based paint during construction activities to a less than significant level.

Operation

The Project involves construction of a new mixed-use development that includes 132 multi-family residential units and 12,000 square feet of commercial/office uses in Planning Areas 1 and 2; and multi-family residential and retail uses within Planning Areas 3 and 4. Residential, commercial, and office uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment because residents are not anticipated to use, store, dispose, or transport large volumes of hazardous materials. Hazardous substances associated with residential, commercial, and office uses are typically limited in both amount and use. Project operation would involve the use of potentially hazardous materials (e.g., solvents, cleaning agents, paints, fertilizers, and pesticides) that, when used correctly and in compliance with existing laws and regulations, would not result in a significant hazard to people in the vicinity of the Project site.

No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur with implementation of the proposed Project. Typical use of household, commercial, and office hazardous materials (e.g., pesticides, fertilizer, solvents, cleaning products, and paints) would not generally result in the transport, disposal, or release of hazardous materials in an amount that would create a significant hazard to the public or environment. Therefore, impacts would be less than significant, and no mitigation would be required.

IMPACT HAZ-2: THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET OR ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT.

Less than Significant Impact.

Construction

Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, excavation, grading, and construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, implementation of the proposed Project could potentially result in the accidental release of hazardous materials.

As described previously, the Limited Phase II ESA conducted soils testing that indicated TPH-diesel, TPH-motor oil, and organochlorine pesticide concentrations were non-detectable; concentration of lead were below the screening level; the maximum concentration of arsenic were within the expected background concentration for arsenic in Southern California; and the remaining metal concentrations were below the corresponding screening levels. Overall, the testing results show that the site soils meet residential development standards (Phase II 2019). Thus, on-site soils do not contain contaminants that could be released during construction that would create a significant hazard to the public or environment.

In addition, the use of BMPs during construction implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction

Permit (and included as PPP WQ-1) would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Asbestos Containing Materials. Buildings within the Project site were constructed in the 1950s when many structures were constructed with what are now recognized as hazardous building materials, such as lead and asbestos. Demolition of these structures could result in the release of hazardous materials. However, asbestos abatement contractors must follow state regulations contained in California Code of Regulations Sections 1529, and 341.6 through 341.14 as implemented by SCAQMD Rule 1403 to ensure that asbestos removed during demolition or redevelopment of the existing buildings is transported and disposed of at an appropriate facility. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition permit until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. These requirements are included as PPP HAZ-1 to ensure that the Project applicant submits verification to the City that the appropriate activities related to asbestos have occurred, which would reduce the potential of impacts related to asbestos to a less than significant level.

Lead Based Materials. Lead-based materials may also be located within existing structures within the Project site. The lead exposure guidelines provided by the U.S. Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62, and state regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1, as implemented by Cal-OSHA. These regulations cover the demolition, removal, cleanup, transportation, storage and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. Cal/OSHA's Lead in Construction Standard requires Project applicants to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. These requirements are included as PPP HAZ-2 to ensure that the Project applicant submits verification to the City that the appropriate activities related to lead have occurred, which would reduce the potential of impacts related to lead-based materials to a less than significant level.

Operation

As described above, the risks related to upset or accident conditions involving the release of hazardous materials into the environment would be adequately addressed through compliance with existing federal, state, and local regulations. Development pursuant to the proposed Project would involve multi-family

residential and commercial/office uses that would use and store common hazardous materials such as paints, solvents, and cleaning products. Also, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides.

As described previously, normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the Project site. In addition, a LID plan is required to be implemented (as further discussed in Section 5.8, *Hydrology and Water Quality* and included as PPP WQ-2). The BMPs that would be implemented as part of the LID plan would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the new development pursuant to the proposed Project. As a result, operation of the proposed Project would not result in 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, and impacts would be less than significant.

5.7.7 CUMULATIVE IMPACTS

Cumulative land use changes within the City would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. All hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety. Thus, if hazardous materials are found to be present on present or future project sites appropriate remediation activities would be required pursuant to standard federal, state, and regional regulations. Compliance with the relevant federal, state, and local regulations throughout the City during construction and operation of related projects would ensure that cumulative impacts from hazardous materials would be less than significant.

5.7.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Federal

- United States Code of Federal Regulations Title 42, Sections 6901 et seq.: Resource Conservation and Recovery Act
- United States Code of Federal Regulations Title 42, Sections 11001 et seq.: Emergency Planning & Community Right to Know Act
- United States Code of Federal Regulations Title 49, Parts 101 et seq.: Regulations implementing the Hazardous Materials Transportation Act (United States Code of Federal Regulations Title 49 Sections 5101 et seq.)
- United States Code of Federal Regulations Title 15, Sections 2601 et seq.: Toxic Substances Control Act
- US Environmental Protection Agency Asbestos Hazard Emergency Response Act, 40 United States Code of Regulations Section 763

State

- California Occupational Safety and Health Administration Regulation 29, CFR Standard 1926.62

- California Code of Regulations Title 24, Part 2: California Building Code
- California Code of Regulations Title 24, Part 9: California Fire Code
- California Code of Regulations Title 8, Section 1532.1, Lead in Construction Standard
- California Code of Regulations Title 8, Section 1529: Asbestos
- Title 8 of the California Code of Regulations, Section 1532.1: Lead

Regional

- South Coast Air Quality Management District Rule 1403: Asbestos

Plans, Program and Policies (PPPs) and Standard Conditions

The following Plans, Programs, and Policies (PPP) related to hazards and hazardous materials are incorporated into the Project and would reduce impacts related to hazards and hazardous materials. These actions will be included in the Project's mitigation monitoring and reporting program (MMRP):

PPP HAZ-1: SCAQMD Rule 1403. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted on the structures proposed for demolition. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

PPP HAZ-2: Lead. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted on the structures proposed for demolition. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building and Safety Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP WQ-2: LID. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Building and Safety Division. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.7.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and the proposed Project's design criteria, Impacts HAZ-1 and HAZ-2 would be less than significant.

5.7.10 MITIGATION MEASURES

No mitigation measures are required.

5.7.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Existing regulatory programs would reduce potential impacts associated with hazards and hazardous materials to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to hazards and hazardous materials would occur.

REFERENCES

City of Covina Safety Element. Accessed:

https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1073/safety_element.pdf

Phase I Environmental Site Assessment Report. Prepared by ENGEO Incorporated. Appendix G.

Limited Phase II Environmental Site Assessment Report. Prepared by ENGEO Incorporated. Appendix H.

5.8 Hydrology and Water Quality

5.8.1 INTRODUCTION

This section describes the environmental and regulatory settings and identifies potential impacts for hydrology and water quality resources. This section includes data from the Geotechnical Engineering Investigation (GEO 2017), Prepared by GeoSoils Consultants, Inc., included as Appendix E; the Preliminary Low Impact Development Plan (Hunsaker 2019a), Prepared by Hunsaker & Associates Irvine, Inc., included as Appendix G; and the Preliminary Hydrology Report (Hunsaker 2019b), Prepared by Hunsaker & Associates Irvine, Inc., included as Appendix J.

5.8.2 REGULATORY SETTING

Clean Water Act

The U.S. Environmental Protection Agency (USEPA) is the federal agency that implements the Clean Water Act (CWA), which is responsible for water quality management. The purpose of the CWA is to protect and maintain the quality and integrity of the nation's waters by requiring states to develop and implement state water plans and policies.

CWA Section 303, Total Maximum Daily Loads (TMDL): Section 303 of the CWA requires states to establish water quality standards consisting of designated beneficial uses of water bodies and water quality standards to protect those uses for all Waters of the United States. Under Section 303(d) of the CWA, states, territories, and authorized tribes are required to develop lists of impaired waters. Impaired waters are waters that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires that these jurisdictions establish a priority ranking for listed waters and develop action plans to improve their water quality. This process includes development of Total Maximum Daily Loads (TMDL) that set discharge limits for non-point source pollutants.

A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards. The Ducheny Bill (AB 1740) requires the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) to post this list and to provide an estimated completion date for each TMDL.

CWA Section 402, National Pollutant Discharge Elimination System (NPDES) Permit: Direct discharges of pollutants into Waters of the United States are not allowed, except in accordance with the NPDES program established in Section 402 of the CWA. The main goal of the NPDES program is to protect human health and the environment. Pursuant to the NPDES program, permits that apply to storm water discharges from municipal storm drain systems, specific industrial activities, and construction activities (one acre [ac] or more) have been issued. NPDES permits establish enforceable effluent limitations on discharges, require monitoring of discharges, designate reporting requirements, and require the permittee to include use of Best Management Practices (BMPs). Industrial (point source) storm water permits are required to meet effluent limitations, while municipal and construction permits are governed by the maximum extent practicable (MEP) or the Best Available Technology (BAT)/Best Control Technology (BCT) application of BMPs. SWRCB are required to require the development of state-specific permits that comply with the NPDES Permit.

Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969, codified as Division 7 of the California Water Code, authorizes the State Water Resources Control Board (SWRCB) to provide comprehensive protection for California's waters through water allocation and water quality protection. The SWRCB implements the requirements of Clean Water Act (CWA) and establishes water quality standards that have to be set for certain waters by adopting water quality control plans under the Porter-Cologne Act. The Porter-Cologne Act establishes the responsibilities and authorities of the 9 Regional Water Quality Control Boards (RWQCB), including preparing water quality plans for areas in the region, and identifying water quality objectives and waste discharge requirements (WDRs). Water quality objectives are defined as limits or levels of water quality constituents and characteristics established for reasonable protection of beneficial uses or prevention of nuisance. Beneficial uses consist of all the various ways that water can be used for the benefit of people and/or wildlife.

The Project site lies within the eastern-central portion of the San Gabriel River Watershed. The central and lower portions of the watershed is heavily urbanized, with the lower part of the river flowing through a concrete-lined channel prior to becoming a soft bottom channel near the City of Long Beach. The Project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The Los Angeles RWQCB has adopted the LARWQCB Basin Plan. This Basin Plan gives direction on the beneficial uses of the waters, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the established standards.

California Anti-Degradation Policy

A key policy of California's water quality program is the State's Anti-Degradation Policy. This policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (SWRCB Resolution No. 68-16), restricts degradation of surface and ground waters. In particular, this policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. Under the Anti-Degradation Policy, any actions that can adversely affect water quality in all surface and ground waters must (1) be consistent with maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of the water; and (3) not result in water quality less than that prescribed in water quality plans and policies (i.e., will not result in exceedances of water quality objectives).

California Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on July 17, 2012. The Construction General Permit regulates construction site stormwater management. Dischargers whose Projects disturb one or more acres of soil, or whose Projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Stormwater Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action

levels for pH and turbidity as well as requirements for qualified professionals to prepare and implement the plan. An appropriate permit fee must also be mailed to LARWQCB.

The Construction General Permit requires project applicants to file a Notice of Intent with the LARWQCB to discharge stormwater, and to prepare and implement a SWPPP for Projects that will disturb greater than 1 acre of soil. The SWPPP would include a site map, description of stormwater discharge activities, and best management practices (BMPs) taken from the menu of BMPs set forth in the California Stormwater Quality Association BMP Handbook that will be employed to prevent water pollution. The SWPPP is required to include BMPs that will be used to control soil erosion and discharges of other construction-related pollutants (e.g., petroleum products, solvents, paints, cement) that could contaminate nearby water resources. It must demonstrate compliance with local and regional erosion and sediment control standards, identify responsible parties, provide a detailed construction timeline, and implement a BMP monitoring and maintenance schedule. The Construction General Permit also requires the SWPPP to identify BMPs that will be implemented to reduce controlling potential chemical contaminants from impacting water quality. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-stormwater management (e.g., water conservation), and waste management. The SWPPP is also required to include BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs).

California Water Resources Control Board Low Impact Development Policy

In compliance with the NPDES Permit, the LARWQCB adopted the Permittees have implemented a stormwater quality management program (SQMP) with the ultimate goal of accomplishing the requirements of the Permit and reducing the amount of pollutants in stormwater and urban runoff wherein new development/redevelopment Projects are required to prepare a Low Impact Development (LID) report. LID is a proven approach to manage stormwater.

Los Angeles Regional Water Quality Control Board Water Quality Control Plan

The City of Covina is within the jurisdiction of the LARWQCB. The RWQCB sets water quality standards for all ground and surface waters within its region through implementation of a Water Quality Control Plan (Basin Plan). The Basin Plan describes existing water quality conditions and establishes water quality goals and policies. The Basin Plan is also the basis for the Regional Board's regulatory programs. To this end, the Basin Plan establishes water quality standards for all the ground and surface waters of the region. The term "water quality standards," as used in the federal Clean Water Act, includes both the beneficial uses of specific water bodies and the levels of quality which must be met and maintained to protect those uses. The Basin Plan includes an implementation plan describing the actions that are necessary to achieve and maintain target water quality standards. The goal of the Basin Plan is to protect public health and welfare and maintain or enhance water quality and potential beneficial uses of the water.

Los Angeles Regional Municipal Separate Storm Sewer System Permit

The Municipal Separate Storm Sewer System (MS4) Permit for the Los Angeles Region regulates urban runoff from areas under jurisdiction of the Permit's various permittees, which include Los Angeles County, Los Angeles County Flood Control District, and the incorporated cities within Los Angeles County including the City of Covina. When discharged, urban runoff (or stormwater) has the potential to mix with and carry various pollutants into receiving waters. The Permit lists allowable and unallowable discharges and requires implementation of LID infrastructure, which are engineered facilities that are designed to retain and/or biotreat runoff on the Project site. Developments that qualify as a development or redevelopment Project, which includes the proposed Project as specified by criteria in the MS4 Permit, are required to develop a site-specific LID plan, which includes site design, source control and treatment control elements to reduce the

discharge of pollutants in runoff. The LID plan is required to be approved prior to the issuance of a building or grading permit, and post-construction BMPs are required to be implemented. The MS4 Permit requires priority Projects to infiltrate, harvest and use, evapotranspire, or biotreat/biofilter, the 85th percentile of a 24-hour storm event (Design Capture Volume). The MS4 Permit also requires the evaluation and use of LID features using the following hierarchy of treatment: infiltration, evapotranspiration, harvest/reuse, and biotreatment.

Biotreatment BMPs are a broad class of LID BMPs that reduce storm water volume to the maximum extent practicable, treat storm water using various treatment mechanisms, such as media filtration (though biologically-active media), vegetative filtration (straining, sedimentation, interception, and stabilization of particles resulting from shallow flow through vegetation), general absorption processes (i.e., absorption, adsorption, ion exchange, precipitation, surface complexation), biologically-mediated transformations, and other processes to address both suspended and dissolved constituents. Examples of biotreatment BMPs include bioretention with underdrains, vegetated swales, constructed wetlands, and proprietary biotreatment systems.

City of Covina General Plan

City policies pertaining to hydrology and water quality are contained in the Land Use Element of the General Plan. The following policies from the General Plan Land Use Element are relevant to the proposed Project:

Policy 1.a: Support the efforts at all levels of government to monitor and regulate water quality and conditions, ensuring that all applicable standards are met.

Policy 1.b: Support the efforts at various codes and standards of all levels of government to protect ground water resources from depletion and sources of pollution, which as soil-leaching hazardous materials.

Policy 1.c: Support Federal, State, and regional efforts to remedy existing ground water pollution problems.

Policy 1.d: Continue local efforts to handle ground water contamination problems, including, but not limited to, shutting down or reconstructing water wells and appropriately treating water from operating wells to meet all applicable water quality standards.

Policy 1.i: Ensure the adequacy of water supplies to meet all existing and future demands and applications, particularly public safety.

Policy 1.k: Ensure adequate water pressure for all uses and purposes.

Policy 1.l: Follow the Covina Water Conservation Ordinance, when necessary, and provide conservation kits and general information to best promote water conservation.

Policy 1.m: Follow the City's Water-Efficient Landscape Ordinance for the sites of new and significantly expanded/remodeled developments as a viable conservation tool.

Policy 1.n: Encourage the incorporation of water conservation features in the design of all new and significantly expanded/remodeled developments and in the installation of conservation devices in existing developments, including, but not limited to, low-flow toilets and shower registers.

City of Covina Municipal Code

Chapter 8.50; Storm Water Quality and Urban Runoff Control: This code section states that all new development and significant redevelopment within the City shall be undertaken in accordance with the National Pollutant Discharge Elimination System (NPDES). Prior to the issuance by the City of a grading permit, building permit or nonresidential plumbing permit for any new development or significant

redevelopment, City agencies are required to review the project plans and impose terms, conditions and requirements on the project. The owner of a new development or significant redevelopment project shall implement and adhere to the terms, conditions and requirements on the new development or significant redevelopment project.

Section 13.06, Water Conservation: The City of Covina Municipal Code (Chapter 13.06, Water Conservation) includes permanent water conservation requirements to avoid waste of water.

5.8.3 ENVIRONMENTAL SETTING

Watershed

The Project site is in the San Gabriel River Watershed. The San Gabriel River Watershed is located in the eastern portion of Los Angeles County. It is bound by the San Gabriel Mountains to the north, most of San Bernardino/Orange County to the east, the division of the Los Angeles River from the San Gabriel River to the west, and the Pacific Ocean to the south. The watershed covers approximately 640 square miles and there are approximately 35 cities within the watershed. The watershed drains into the San Gabriel River from the San Gabriel Mountains flowing 58 miles south until its confluence with the Pacific Ocean. Major tributaries to the San Gabriel River include Walnut Creek, San Jose Creek, Coyote Creek, and numerous storm drains entering from the 19 cities that the San Gabriel River passes through¹.

Water Quality

Receiving Water Impairments: Section 303(d) of the federal CWA requires states to identify water bodies that are “impaired,” or those that do not meet water quality standards and are not supporting their beneficial uses. Total Maximum Daily Loads (TMDLs) are then designed to serve as pollution control plans for these specific pollutants and water bodies.

As described further below, runoff from the Project site and surrounding area is conveyed to Walnut Creek Channel, prior to discharging to Reach 3, 2 and 1 of the San Gabriel River. Impairments to these receiving waters are listed in Table 5.8-1.

Table 5.8-1: Receiving Waters and 303(d) Listing Status

Receiving Water	303(d)	TMDL Status
Walnut Creek	Benthic Community Effects Indicator Bacteria, pH	TMDL Required
San Gabriel River Reach 3	Indicator Bacteria	Approved TMDL
San Gabriel River Reach 2	Cyanide, Temperature	TMDL Required
San Gabriel River Reach 1	Lead pH, Temperature	Approved TMDL TMDL Required
San Gabriel River Estuary	Dioxin, Nickel Oxygen, Dissolved Copper, Indicator Bacteria	TMDL Required Approved TMDL

Source: Hunsaker 2019a

¹ <https://dpw.lacounty.gov/wmd/watershed/sg/>

Drainage Conditions

The Planning Areas 1 and 2 are currently 94 percent impervious (Hunsaker 2019a). Stormwater and surface water on the site generally flow from the northeast to the southwest. The runoff from the site discharges into Rimsdale Avenue and Badillo Street. There are catch basins and storm drain systems at the northwest of the Rimsdale Avenue and Badillo Street intersection and at the southwest Project site boundary along Badillo Street. The catch basin flows discharge into the existing 81-inch storm drain in Badillo Street (Hunsaker 2019b). Runoff is then conveyed westerly approximately 2.25 miles to Big Dalton Wash, which is an open, concrete lined, rectangular-channel. Runoff is then conveyed southeasterly approximately 2 miles to the confluence with the Walnut Creek Channel, prior to discharging to Reach 3, 2 and 1 of the San Gabriel River, and ultimately outflowing to the Pacific Ocean.

Flood Zone

According to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) (06037C1700F), the Project site is primarily located in “Zone X”, which is an area located outside of the 100-year and 500-year flood plains.

5.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- WQ-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- WQ-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin;
- WQ-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site;
- WQ-4 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- WQ-5 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- WQ-6 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows;
- WQ-7 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation; or
- WQ-8 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The Initial Study established that the Project would result in no impacts related to Threshold WQ-6 and WQ-7, and less than significant impacts related to Threshold WQ-2. No further assessment of these impacts is required in the EIR.

5.8.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hydrology and water quality is based on a review of published information and reports regarding regional hydrology and surface water quality. The potential impacts on hydrology and water quality were evaluated by considering the general type of pollutants that the Project would generate during construction and operation. In determining the level of significance, the analysis recognizes that development under the proposed Project would be required to comply with relevant federal, state, and regional laws and regulations that are designed to ensure compliance with applicable water quality standards and waste discharge requirements. Because the regional and local regulations related to water quality standards have been developed to reduce the potential of pollutants in the water resources (as described in the Regulatory Setting Section above), and are implemented to specific waterbodies, such as 303(d) requirements, or development Projects such as grading and construction permit regulations, implementation of all relevant water quality and hydrology requirements would limit the potential of the proposed Project to a less than significant impact.

5.8.6 ENVIRONMENTAL IMPACTS

IMPACTS WQ-1: THE PROJECT WOULD NOT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY.

Less than Significant Impact.

Construction

The proposed Project involves the redevelopment of Planning Areas 1 and 2 with a new mixed-use development that would include construction of 132 new residential units and approximately 12,000 square feet of commercial/office uses. In addition, new mixed uses may occur within Planning Areas 3 and 4 by the year 2040. Pollutants of concern during construction within the Project site include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants, such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste, could be spilled, leaked, or transported via stormwater runoff into adjacent drainages and into downstream receiving waters.

Construction pursuant to the proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff, could wash into and pollute waters.

These types of water quality impacts during construction activities would be prevented through implementation of a stormwater pollution prevention plan (SWPPP), included as PPP WQ-1. The existing NPDES Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for the proposed construction activities (included as PPP WQ-1). The SWPPP is required

to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.:

- Silt fencing, fiber rolls, or gravel bags
- Street sweeping and vacuuming
- Storm drain inlet protection
- Stabilized construction entrance/exit
- Vehicle and equipment maintenance, cleaning, and fueling
- Hydroseeding
- Material delivery and storage
- Stockpile management
- Spill prevention and control
- Solid waste management
- Concrete waste management

Adherence to the existing requirements and implementation of the appropriate BMPs as included in PPP WQ-1 and ensured through the City's construction permitting process. This would ensure that construction activities would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction would be minimized. Therefore, impacts would be less than significant.

Operation

The proposed Project would result in operation of additional residential and commercial/office uses on the site that could generate pollutants such as, suspended solids, nutrients, bacteria/viruses/pathogens, pesticides, oil and grease, trash and debris. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, new development pursuant to the Specific Plan would be required to comply with the NPDES permit requirements, which are included in the City's Municipal Code as Chapter 8.50, that would limit the potential for pollutants to discharge from the site.

Pursuant to the existing requirements, construction includes installation of drainage infrastructure in Planning Areas 1 and 2 that would convey runoff to the south to a subsurface detention basin for infiltration and treatment. From there, runoff would flow to a drywell located at the southern portion of the Project site. After treatment through the drywell, flows that have not infiltrated into site soils would be conveyed to an existing storm drain in W Badillo Street.

In compliance with the NPDES Permit and Municipal Code, development projects are required to prepare a Low Impact Development (LID) report, included as PPP WQ-2. The LID report identifies non-structural, structural, and source control and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit. A Preliminary LID report has been developed (included as Appendix G) per these requirements and it includes various BMPs to be incorporated, including those listed in Table 5.8-2. Similarly, prior to development within Planning Areas 3 and 4, a development specific LID report would be required to be approved prior to receipt of permits.

Table 5.8-2: Types of BMPs Incorporated into the Project Design

Type of BMP	Description of BMPs
LID Site Design	<u>Optimize the site layout:</u> The site has been designed so that runoff from impervious surfaces would flow to a subsurface detention basin and drywell for infiltration and treatment. This would slow and retain runoff.
	<u>Use pervious surfaces:</u> Landscaping is incorporated into the Project design to increase the amount of pervious area and onsite retention of stormflows.
Source Control	<u>Storm Drain Stenciling:</u> All inlets/catch basins would be stenciled with the words “Only Rain Down the Storm Drain,” or equivalent message.
	<u>Need for future indoor & structural pest control:</u> The buildings would be designed to avoid openings that would encourage entry of pests.
	<u>Landscape/outdoor pesticide use:</u> Final landscape plans would accomplish all of the following: <ul style="list-style-type: none"> • Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution. • Consider using pest-resistant plants, especially adjacent to hardscape. • To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions
	<u>Roofing, gutters and trim:</u> The architectural design would avoid roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff.
	<u>Plazas, sidewalks and parking lots:</u> Plazas, sidewalks, and parking lots shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing would be collected to prevent entry into the storm drain system. Wash water containing any cleaning agent or degreaser would be collected and discharged to the sanitary sewer and not discharged to a storm drain.
Treatment Control	<u>Biofiltration Systems:</u> The proposed detention basin and drywell system would detain runoff, filter it prior to discharge.

As described previously, the LID report is required to be approved prior to the issuance of a building or grading permit, which would ensure it complies with the Los Angeles County RWQCB MS4 Permit regulations. In addition, the City’s permitting process would ensure that all BMPs in the LID report would be implemented during construction and operation. Overall, implementation of the LID report pursuant to the existing regulations (included as PPP WQ-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

IMPACT WQ-3: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE.

Less than Significant Impact. The Project site does not include, and is not adjacent to, a stream or river. Implementation of the Project would not alter the course of a stream or river.

Construction

Construction related to implementation of the proposed Project would expose and loosen building materials and sediment, which has the potential to mix with storm water runoff and result in erosion or siltation off-site. However, as described previously the NPDES Construction General Permit and City Municipal Code requires

preparation and implementation of a SWPPP by a Qualified SWPPP Developer for the proposed construction activities (included as PPP WQ-1). The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit through a SWPPP (per PPP WQ-1) would prevent construction-related impacts to potential alteration of a drainage pattern or erosion from development activities. Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion, siltation, and increases in stormwater runoff would be less than significant.

Operation

As described previously, Planning Areas 1 and 2 are currently 94 percent impervious and stormwater flows from the northeast to the southwest into existing drainage facilities. The proposed drainage system would convey runoff to the south, to a subsurface detention basin for infiltration and treatment. From there, runoff would flow to a drywell located at the southern portion of the Project site. After treatment through the drywell, flows that have not infiltrated into site soils would be conveyed to an existing storm drain in W. Badillo Street. Therefore, the Project would not substantially alter the drainage pattern of the area.

In addition, as detailed in the Preliminary Hydrology Report (Appendix H), the proposed development within Planning Areas 1 and 2 would result in a reduction of impervious surfaces on the site. As described previously, the Planning Areas 1 and 2 are currently 94 percent impervious. With implementation of the proposed development the area would be 86 percent impervious, which is an 8 percent increase in pervious areas within Planning Areas 1 and 2. As described in the Hydrology Report calculations (Appendix H), in the 94 impervious condition, the area has a runoff of 11.51 cfs during a 25-year storm. With implementation of the Project, the 8 percent increase in pervious surfaces would result in a 25-year storm flow of 10.83 cfs, which is a 0.68 cfs decrease in runoff compared to the existing condition (Hunsaker 2019a). Therefore, stormwater runoff from Planning Areas 1 and 2 would decrease with implementation of the proposed Project; and additional runoff would not occur that could cause substantial erosion or siltation. With the decrease in stormwater runoff and implementation of the MS4 permit regulations implemented through the Preliminary LID plan, which would be ensured through the City's permitting approval process, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant. Similarly, prior to development within Planning Areas 3 and 4, a development specific LID report would be required to be approved prior to receipt of permits, which would ensure that impacts are less than significant.

IMPACT WQ-4: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE.

Less than Significant Impact. As described previously, the Project site does not include, and is not adjacent to, a stream or river. Implementation of the proposed Project would not alter the course of a stream or river.

Construction

Implementation of the proposed Project would include construction activities that could temporarily alter the existing drainage pattern of the site and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of the proposed construction requires a SWPPP (included as PPP WQ-1) that would address site specific drainage issues related to construction activities and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP (per PPP WQ-1), as verified by the City through the construction permitting process, would prevent construction-related impacts related to potential alteration of a drainage pattern or flooding on or off-site from development activities. Therefore, impacts would be less than significant.

Operation

As described previously, the proposed Project would result in an 8 percent decrease of impervious surfaces within Planning Areas 1 and 2. As described in the Hydrology Report calculations (Appendix H), with implementation of the Project, the increase in pervious surfaces would result in a 25-year storm flow of 10.83 cfs, which is a 0.68 cfs decrease in runoff within Planning Areas 1 and 2 compared to the existing condition (Hunsaker 2019a). Therefore, stormwater runoff from Planning Areas 1 and 2 would decrease with implementation of the proposed Project and would not cause flooding on or off-site. The Preliminary LID plan would be ensured through the City's permitting approval process. Similarly, prior to development within Planning Areas 3 and 4, a development specific LID report would be required to be approved prior to receipt of permits. Therefore, impacts related to flooding from operational activities would be less than significant.

Overall, the proposed drainage system and adherence to the existing MS4 permit regulations would ensure that potential impacts related to alteration of a drainage pattern or flooding from operational activities would be less than significant.

IMPACT WQ-5: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF.

Less than Significant Impact. As described previously, the Project site does not include, and is not adjacent to, a stream or river and implementation of the Project would not alter the course of a stream or river.

Construction

As described in the previous response, construction could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. However, as described previously, implementation of construction requires a SWPPP (included as PPP WQ-1) that would address site specific pollutant and drainage issues related to construction and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and SWPPP (per PPP WQ-1), as verified by the City through the construction permitting process, would prevent construction-related impacts related to increases in runoff and pollution from development activities. Therefore, impacts would be less than significant.

Operation

As described previously, the proposed Project would result in an 8 percent decrease of impervious surfaces within Planning Areas 1 and 2. As described in the Hydrology Report calculations (Appendix H), with implementation of the Project, the increase in pervious surfaces would result in a 25-year storm flow of 10.83 cfs, which is a 0.68 cfs decrease in runoff compared to the existing condition within Planning Areas 1 and 2 (Hunsaker 2019a). Therefore, stormwater runoff from the site would decrease with implementation of the proposed Project and would not exceed the capacity of stormwater drainage systems.

In addition, the proposed Project would install drainage infrastructure in Planning Areas 1 and 2 that would convey runoff to the south to a subsurface detention basin for infiltration and treatment. From there, runoff would flow to a drywell located at the southern portion of the Project site. After treatment through the drywell, flows that have not infiltrated into site soils would be conveyed to an existing storm drain in W. Badillo Street. This proposed stormwater system would control stormwater drainage and provide filtration to remove pollutants prior to discharge of runoff that is not infiltrated onsite.

In compliance with the NPDES Permit and Municipal Code, the development within the Project site is required to implement a Low Impact Development (LID), included as PPP WQ-2, and would be ensured through the City's permitting process. As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City's Engineering Division to ensure that construction specifications adhere to MS4 permit regulations, which would ensure that pollutants are removed prior to discharge. Overall, with compliance to the existing regulations as verified by the City's permitting process, impacts related to the capacity of the drainage system and polluted runoff would be less than significant.

IMPACT WQ-8: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN.

Less than Significant Impact. As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit and PPP WQ-1 would serve to ensure that construction activities do not result in a degradation of water quality, and impacts would be less than significant. Thus, construction associated with the proposed Project would not conflict or obstruct implementation of a water quality control plan.

Also, as described previously, new development projects are required to implement LID (per the Regional MS4 Permit), and a LID report is included as PPP WQ-2. The LID specifications and BMPs are verified as part of the City's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed Project would not conflict or obstruct with a water quality control plan.

In addition, with implementation of the Project, would have an 8 percent increase in pervious surfaces within Planning Areas 1 and 2 that would result in a 0.68 cfs decrease in runoff from a 25-year storm flow condition, compared to the existing condition (Hunsaker 2019a). The Project provides for infiltration through landscaping areas and the subsurface detention basin and drywell system that provides for infiltration of stormwater. Thus, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant.

5.8.7 CUMULATIVE IMPACTS

Water Quality: The geographic scope for cumulative impacts related to hydrology and water quality includes the San Gabriel River Watershed because cumulative projects and developments pursuant to the proposed Project could incrementally exacerbate the existing impaired condition and could result in new pollutant related impairments.

Related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a LID plan (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration, in areas permitted. The NPDES permit requirements have been set by the State Water Board and implemented by the Los Angeles RWQCB to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable with compliance with all applicable laws, permits, ordinances and plans. As detailed previously, the proposed Project would be implemented in compliance with all regulations, as would be verified during the permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

Drainage: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the drainage area, from capture of runoff through final discharge points. As described above, with implementation of the Project, pervious surfaces would increase within Planning Areas 1 and 2, and stormwater runoff would decrease. Similar drainage infrastructure pursuant to LID requirements would be included as part of future development within Planning Areas 3 and 4. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively combine to impact drainage. Thus, cumulative impacts related to drainage would be less than significant.

5.8.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

- Construction General Permit, Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ
- California Water Resources Control Board Low Impact Development (LID) Policy
- Los Angeles Region MS4 Permit
- Municipal Code Section 8.50.120; Low Impact Development

Plans, Program and Policies

The following Plans, Programs, and Policies (PPP) related to hydrology and water quality are incorporated into the Project and would reduce impacts related to hydrology and water quality. These actions will be included in the Project's mitigation monitoring and reporting program (MMRP):

PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building and Safety Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP WQ-2: LID. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Building and Safety Division. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.8.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements Impacts WQ-1, WQ-3, WQ-4, WQ-5, and WQ-8 would be less than significant.

5.8.10 MITIGATION MEASURES

No mitigation measures are required.

5.8.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to hydrology and water quality have been identified and impacts would be less than significant.

REFERENCES

City of Covina General Plan Natural Resources and Open Space Element, 2000. Accessed: https://covina.gov/sites/default/files/fileattachments/planning_commission/page/1073/natural_resources_and_open_space.pdf

FEMA Flood Map Service Center. Accessed: <https://msc.fema.gov/portal/search>

Geotechnical Engineering Investigation. Prepared by GeoSoils Consultants, Inc. Appendix E.

Preliminary Low Impact Development Plan. Prepared by Hunsaker & Associates Irvine, Inc. Appendix I.

Preliminary Hydrology Report. Prepared by Hunsaker & Associates Irvine, Inc. Appendix J.

5.9 Land Use and Planning

5.9.1 INTRODUCTION

In accordance with CEQA Guidelines Section 15125(d), this section provides a summary of the plans, policies, and regulations of the City of Covina, and regional, state, and federal agencies that have policy and regulatory control over the proposed Project site. Policy conflicts do not, in and of themselves, indicate a significant environmental effect within the meaning of CEQA. To the extent that physical environmental impacts may result from such conflicts, those impacts are analyzed in this EIR in the specific topical sections to which the impact pertains (e.g., noise, air quality, greenhouse gas emissions, or transportation and traffic). More specifically, this section examines the potential for the proposed Project to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, including relevant goals and policies of the City of Covina General Plan and the City's zoning code.

5.9.2 REGULATORY SETTING

SCAG Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016 SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). Most of the plan's goals are related to transportation and the efficiency of transportation. Because the proposed Project does not involve transportation, many of the goals are not relevant to the proposed Project:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.
3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.
5. Maximize the productivity of our transportation system
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and active transportation.
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

City of Covina General Plan

General Plan Land Use Designations

The Project site currently has General Plan Land Use designations of General Commercial and High Density Residential (shown in Figure 3-5) and the project proposes a General Plan Amendment to change the land use designation of the Project site to Specific Plan (SP). These General Plan land use designations are described below:

General Commercial: Permitted uses include various types of retail and service businesses and administrative, professional, and governmental offices, 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. The maximum development net intensity/gross floor area ratio (FAR) is 1.5 (maximum ratio of total building square footage to net acreage of site). A project may exceed the 1.5 FAR with City approval.

High Density Residential: The primary uses include apartments (two-unit structures and up), condominiums, townhouses, mobile homes, and the following two cases pertaining to a single lot: two or more single-family detached houses, or a single-family detached residence and apartments. Also permitted are single-family detached houses on individual lots and State-defined granny flat units and group homes, and, as described in the Zoning Ordinance, institutional uses, such as churches, large group houses, convalescent hospitals, meeting halls/lodges, and nursery schools plus governmental and utility facilities. Permitted residential density is 14.1-22.0 dwelling units per net acre of land. Non-residential FAR ratio is 0.5 (maximum ratio of total building square footage to net acreage of site).

General Plan Goals and Policies

The Covina General Plan is the City's blueprint for long-range growth and development and includes the following elements: Land Use; Circulation; Housing; Natural Resources and Open Space; Noise; and Safety. Each element contains a discussion of issues, goals and policies, and action measures. The following existing goal and policies in the General Plan are relevant to the proposed Project.

Land Use Element

Policy 1.1.1: Ensure that the type, location, and intensity of all new and intensified developments adhere to the requirements and standards specified for their particular land use categories and the rest of the General Plan, zoning, plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered.

Policy 1.1.4: Accommodate growth that adequately serves existing and future residents, workers, shoppers, and others while protecting their health, safety, and welfare.

Policy 1.1.5: Accommodate growth that is consistent with current general land use patterns, that maintains existing relative land use quantities, and that respects physical and environmental resources and constraints.

Policy 1.1.6: Facilitate, through zoning provisions and applicable procedures, infill development, development of now-underutilized or vacant parcels, and, where necessary, redevelopment of deteriorating properties, particularly for housing creation and rehabilitation and economic development purposes.

Policy 1.1.9: Provide for the continuation of existing and development of new or expanded public streets and facilities, storm drains and other infrastructure, parking amenities, and utilities to support the City's land uses and meet all needs.

Policy 1.1.14: Require that future growth, infill, and revitalization activities be consistent with City-adopted positions, policies, and programs regarding regional planning and growth management matters—such as air quality attainment, recycling, hazardous waste management, trip reduction, congestion management, stormwater runoff, water quality, housing, transportation, and circulation.

Policy 1.1.29: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure changes or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential land use and related impacts.

Policy 1.2.9: Encourage that medium- to high-density complexes be developed in appropriately designated areas and replace old, deteriorating residential structures.

Policy 1.2.14: Require, except where community goals, objectives, and policies are best furthered, that both new and remodeled residential developments comply with zoning and other standards, incorporate adequate amenities, and achieve a high level of architectural and site design quality to ensure a high quality of life for local residents and to ensure long-term building maintenance and viability.

Policy 1.3.7: Accommodate new and expanded commercial and industrial developments, for community economic betterment and image enhancement and related reasons, in a fashion that neither adversely affects the integrity of established commercial and/or industrial areas nor unreasonably encroaches into residential neighborhoods and that does not impose an undue burden on local infrastructure or services.

Policy 1.3.17: Encourage the revitalization or upgrading of deteriorating commercial and industrial structures through City, Redevelopment Agency, private development, and/or other efforts.

Policy 2.1.1: Ensure that all developments adhere to the requirements and standards specified for their particular land use categories and the rest of the General Plan plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered.

Policy 2.1.6: Require that parcels developed for commercial or industrial uses, when abutting residential properties, incorporate buffers that adequately protect the residential properties from noise, light, trash, visual and environmental disturbances, vehicular traffic, and other factors. Such buffers shall include, but are not limited to, building setback and architecture, landscaping, walls, and other physical and aesthetic features.

Policy 2.1.13: Permit mixed uses (residential and commercial) in appropriate areas in the downtown and, if possible, elsewhere, in a manner consistent with special, applicable standards, to provide needed housing in an alternative setting and to complement districtwide physical and economic revitalization activities.

Policy 2.1.17: Identify and encourage the retention and preservation of significant architectural, historical, and/or cultural resources.

Policy 2.2.4: Accommodate various new housing types, including apartments built with density bonuses, “granny flats” or second units, and mixed-use complexes, in a fashion that does not adversely affect the integrity of established residential areas and at numbers that will not inhibit the City’s ability to meet street capacities and to provide other infrastructure, utilities, and adequate community services.

Policy 2.2.6: Orient medium- and high-density uses, such as apartments, condominiums, townhomes, and mobile home parks, in and/or around the downtown and in areas where such developments now exist.

Policy 3.a: Achieve land use arrangements that provide for adequate separation and physical and visual buffers between land uses characterized by different functions, intensities, and/or densities to ensure their compatibility and to avoid conflicts.

Policy 3.i: Enforce all Design Guidelines and zoning provisions to ensure that all developments achieve a high degree of architectural integrity and landscaping, site design efficiency, good workmanship, a respect of physical and environmental constraints, and adequate amenities that enhance the quality of life for residents, workers, shoppers, and others, except in appropriate cases such as affordable housing construction, PCD (Planned Community Development) overlay district application, and/ or where community goals, objectives, and policies are best furthered.

Policy 5.f: Assess the impacts of incremental increases in development and housing units on emergency services and ensure, through the zoning-related Site Plan Review process, that new construction will not result in a reduction of law enforcement or fire protection services below acceptable levels.

Policy 5.i: Assure that all existing, new, and/or expanded development address fire protection in a preventative manner by requiring in various developments fire protection and smoke detection systems and/or automatic sprinkler systems. Also, require that all new buildings incorporate adequate ingress and egress and encourage owners of existing, old structures to upgrade their exit systems and structural conditions.

Policy 5.j: Assure that all new or expanded medium to high density/intensity residential, commercial, and industrial projects address police protection in a preventative way by maximizing neighborhood surveillance opportunities in the siting and design of structures, utilizing sufficient lighting, and promoting defensible space concepts, such as ensuring visibility of open public areas.

Circulation Element

Policy 1.3: Maintain and, where administratively and financially possible, improve the physical condition, structural integrity, design capacity, utilization, appearance, and/or cleanliness of Covina's public rights-of-way and facilities, including, but not limited to, streets, alleys, sidewalks, medians, landscaping, parking areas, and miscellaneous infrastructure.

Policy 1.4: Where necessary and feasible, conduct traffic circulation improvements and congestion mitigation measures, including, but not limited to, traffic signal installation, synchronization, or upgrade, lane restriping or modification, and/or speed limit, stop sign, or street light installation.

Policy 1.8: In conjunction with major development proposals or other situations on the most congested streets, consider requiring the detailed analysis of specific intersections at peak hours as a means of clarifying the operations of and better identifying acceptable or sufficient mitigation for particular roadway segments.

Policy 1.12: Ensure, where applicable, that private as well as public parking, drive-through, and drop-off/pick-up ingress/ egress locations off of public rights-of-way provide for sufficient access, circulation, maneuverability, visibility, and safety as well as separation from any residential or other sensitive adjacent uses and that all on-site parking facilities adequately serve their accompanying uses and are designed to facilitate safe, functionable, and viable circulation and maneuverability.

Policy 1.26: Ensure that all new and modified public streets and appurtenant components thereof and other infrastructure are designed in accordance with all applicable City standards, except where community goals, objectives, and policies are best furthered, and are designed so as to minimize construction and maintenance costs.

Policy 5.1: For major developments, continue requiring builders/developers to incorporate various traffic congestion mitigation/reduction and additional infrastructure-related amenities and features into their projects, in accordance with the Covina Municipal Code and any other City or Redevelopment Agency provisions.

Policy 5.2: Follow, in a reasonable manner, through the Covina Site Plan Review and other processes, applicable portions of all Federal, State, regional, and County transportation plans/provisions, such as the Los Angeles County Congestion Management Program (CMP), that mandate traffic congestion mitigation and air pollution reduction measures be imposed on major private developments by, among other strategies, minimizing single-occupant trips, advancing alternative modes of transportation, and/or alleviating traffic-

related impacts by requiring the incorporation of appropriate facilities into site design and the performing of necessary traffic impact analyses.

Policy 5.5: Balance the City's obligation to address certain traffic-, circulation-, and general infrastructure-related deficiencies with Covina's need to accommodate residential and non-residential growth or to continue with ongoing communitywide economic development, commercial revitalization, neighborhood preservation, and affordable housing activities/programs.

Policy 5.13: Continue accommodating pedestrian circulation, to the greatest degree possible, in terms of adequately-sized, conveniently located, safe, functional, unobstructed, and disabled-accessible major- and small-street public sidewalks, public crosswalks, private walkways and access routes, private walkways/access route linkages to public sidewalks, and sufficient connections between public sidewalks and crosswalks.

Policy 5.24: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential traffic, circulation, and/or infrastructure impacts.

Policy 6.9: Continue requiring private developers and project proponents to construct street improvements and/or other infrastructure, where required and necessary, to mitigate development impacts.

Policy 6.10: Continue requiring private developers and project proponents to perform traffic/circulation studies/analyses in particular areas or on certain streets or intersections thereof to mitigate development impacts.

Housing Element

Objective 1: The City of Covina will promote the development of various types of dwelling units, at reasonable quantities, that are suitable for all economic segments.

Policy 1.1: The City of Covina shall maintain and/or accommodate development of a variety of housing types, including single-family detached houses, condominiums/town homes, apartments, and mobile homes, second units/granny flats, and mixed uses, to suit all economic segments and as a means of addressing the City's regional housing obligations to the greatest extent possible.

Policy 1.2: The City of Covina shall maintain and consider to reasonably facilitate development of dwelling units particularly suitable for lower and moderate-income residents, such as medium and high density apartments, condominiums/townhouses, second units, and mixed uses, to ensure lower and moderate income household accommodation.

Policy 1.3: The City of Covina shall maintain to the greatest extent practical areas zoned/designated for medium and high density residential facilities and for mobile homes.

Policy 1.5: The City of Covina shall permit and facilitate maximum feasible residential infill development or development of vacant and underutilized parcels through existing zoning provisions and new appropriate procedures as a means of providing a mix of housing for all economic segments and of meeting regional housing needs targets.

Policy 1.8: The City of Covina shall follow all General Plan and Zoning density and development standards, except where community goals, objectives, and policies are best furthered.

Policy 2.2: The City of Covina shall accommodate new housing of various types and densities that reflect the use, scale, and character of existing and/or planned residential uses.

Policy 3.4: The City of Covina shall maintain development and site design standards, architectural and landscaping guidelines, and amenity requirements for all housing types to ensure attractive, functional, and high quality building construction and additions.

Policy 3.11: The City of Covina shall ensure that State noise insulation standards for applicable apartments and condominiums/town homes are met.

Policy 3.14: The City of Covina shall preserve residential districts and buildings in the community that are deemed architecturally and/or historically significant.

Natural Resources and Open Space Element

Natural Resources

Policy 1.m: Follow the City's Water-Efficient Landscape Ordinance for the sites of new and significantly expanded/ remodeled developments as a viable conservation tool.

Policy 1.n: Encourage the incorporation of water conservation features in the design of all new and significantly expanded/ remodeled developments and in the installation of conservation devices in existing developments, including, but not limited to, low-flow toilets and shower registers.

Policy 1.o: Comply with applicable portions of Federal, State, regional, and County plans and programs pertaining to air pollution mitigation/air quality enhancement by following, in a manner that recognizes local needs, issues, views, and policy and financial constraints, various vehicular emissions-reducing and traffic congestion-reducing land use and transportation control and energy conservation measures, proposals, and policies outlined in the Land Use and Circulation Elements, to the greatest extent feasible and practical.

Policy 1.u: Encourage and, where necessary, require the incorporation of energy conservation features in the design of all new and significantly expanded/remodeled private and public developments and encourage the installation of conservation devices in existing developments to increase energy efficiency and decrease pollution emissions from off-site electrical power plants and on-site natural gas use.

Policy 2.g: Require that new and significantly expanded/remodeled private, quasi-public, and public developments, including parking lots, incorporate adequate landscaping, in accordance with City Zoning, Design Guidelines, and general landscape installation provisions, for both aesthetic and ecological reasons.

Policy 3.f: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, particularly those in or abutting natural resource areas, to address all applicable potential impacts, including, but not limited to, land use, circulation, noise, and aesthetics.

Open Space

Policy 1.h: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, particularly those in or abutting natural resource areas, to address all applicable potential impacts, including, but not limited to, land use, circulation, noise, and aesthetics.

Policy 6.p: Continue to require new and significantly enlarged or remodeled single-family detached residences plus apartment, condominium/townhouse, and, if appropriate, mixed use projects to provide

sufficient, on-site open space and, if appropriate, recreational amenities, in accordance with City Zoning and Design Guidelines provisions, to accommodate residents and to supplement public facilities.

Policy 6.p: Continue to require sufficient building setbacks and/or, if appropriate, open space facilities in new and significantly enlarged or remodeled commercial, industrial, institutional, and other nonresidential proposals, in accordance with City Zoning and Design Guidelines provisions, for visual relief and, if applicable, to supplement public facilities.

Policy 6.z: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential impacts on open space lands, including, but not limited to, land use, circulation, noise, and aesthetics.

Safety Element

Policy 1.a: Require all new and expanded or improved buildings and structures to comply with current seismic-related codes, standards, and construction practices.

Policy 1.b: Require adequate soils, geologic, and/or structural studies/evaluations prior to any building construction, particularly in the Covina Hills area, to identify appropriate, development-accommodating engineering and development siting measures.

Policy 2.c: Continue to require that all new and significantly expanded developments incorporate sufficient measures to mitigate flood hazards, including the design of on-site drainage systems to link with citywide flood control infrastructure, the gradation of sites such that runoff does not impact adjacent private properties or structures, and the location of structures above and away from any flooding elevation.

Policy 2.j: Require the use of the greatest amount of landscaping feasible in new and significantly expanded developments to maximize permeable surface area to reduce site runoff as well as for aesthetic purposes, particularly along or near the unimproved portion of Walnut Creek.

Policy 3.b: Maintain all fire-inhibiting Building and Safety and Fire Department requirements and standards for new construction and for substantial additions to existing structures, including those for fire-resistant building materials; fire-resistant roofing components (untreated wood-shakes being prohibited); building construction; detector and alarm systems; fire service equipment; automatic fire sprinklers; one-hour fire walls; clearances around structures; accessibility to and into buildings; and the proper storage of flammable and combustible materials.

Policy 3.c: Maintain all fire-inhibiting Planning Department requirements and standards for new construction and for substantial additions to existing structures, including those for architectural design, site planning, building setback, landscape design, minimum road and driveway widths, and property usage and maintenance.

Policy 4.p: Require proposed commercial and industrial projects/activities to be conditioned to comply with California's general storm water permits and with the Clean Water Act.

Policy 4.q: Require erosion and sediment controls for developments to minimize erosion-related damages and the spillover of sediments to adjacent sites.

Policy 4.ii: Require all new development in Covina to be connected to public sewers.

Policy 5.dd: Where appropriate, apply standards for defensible space in reviewing new and expanded developments to best promote personal security. (Defensible space refers to planning and design techniques that can be used to discourage crime. The concept was developed by Oscar Newman in his book “Defensible Space: Crime Prevention Through Urban Design.”)

Policy 5.pp: Continue to maintain a coordinated, cooperative, and inter-departmental approach in reviewing new or expanded/altered public and private developments and uses and temporary activities through administering the Covina Site Plan Review and Building Permit Issuance processes to facilitate implementation of all City public safety-related codes and standards or to ensure that City Fire, Police, Building and Safety, Planning, and other officials can best comment on all aspects of the proposals involving public safety, including, but not limited to, building and roofing materials; fire sprinklers (if required); alarms and related features; emergency vehicle accessibility/circulation with respect to streets, driveways, parking aisles, clearances around structures, and/or driveway approaches; emergency vehicle parking and unloading; response times; water pressure; defensible space; traffic; lighting; impacts on surrounding areas; and overall structural adequacy as well as the impacts of the projects on existing services/resources. These reviews shall take place at the earliest possible point to permit changes in the proposal, if necessary.

Policy 5.uu: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential general safety and public safety impacts.

Noise Element

Policy 1.1: 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.

Policy 1.2: 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.

Policy 1.6: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.

Policy 1.14: 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.

Policy 2.3: 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.

Policy 2.4: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.

Policy 2.5: Require that parking lots and structures and loading areas be designed to minimize on-site noise impacts and off-site incursions by calling for the use of appropriate walls, buffers, and materials and by insisting upon the configuration of on-site or interior spaces that minimize sound amplification and transmission.

Policy 2.12: Ensure that commercial or industrial buildings are constructed soundly to prevent adverse noise transmission onto adjacent businesses.

Policy 2.13: Ensure that condominium/townhouse and apartment structures are constructed soundly to prevent adverse noise transmission onto adjacent dwelling units.

Policy 2.24: Require that commercial uses developed as part of a mixed use project (e.g., residential dwelling units situated above commercial businesses) not be noise-intensive, except where determined to be appropriate through appropriate features and mitigation.

Policy 2.25: Require that mixed use structures be designed to prevent the transfer of noise and vibration from the commercial activity to the residential use.

Policy 2.26: Require that common walls and doors between commercial and residential uses be constructed so as to minimize the transmission of noise and vibration.

Policy 2.27: Orient mixed use residential units away from major noise sources, to the greatest degree possible.

Policy 2.28: Locate balconies and openable windows of residential units in mixed use projects away from major noise sources, to the greatest degree possible.

Policy 2.32: Continue supporting Federal and State standards pertaining to interior noise levels of commercial and industrial businesses.

Policy 3.2: Encourage the installation of quiet residential air conditioners and outside appliances and devices, with proper installation procedures.

Policy 4.1: Continue implementing the Covina Noise Ordinance to regulate the hours of operation and excessive noise associated with on-site construction activities, particularly activities occurring in or near residential uses, permitting exceptions only under special circumstances.

Policy 4.2: Where necessary, require the construction of barriers to shield noise-sensitive uses from intrusive, construction related noise.

Policy 4.3: Require that construction activities incorporate feasible and practical techniques, measures, and procedures that minimize the noise impacts on all adjacent uses.

Policy 4.4: Consider requiring sound attenuation devices on construction equipment to reduce noises associated with building activities.

Policy 4.8: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential noise impacts.

City of Covina Municipal Code

Title 17, Zoning

The City's Municipal Code Title 17, Zoning, regulates the location and uses of specific uses within the city, including residences, businesses, trades, industries, use of buildings, structures, and land, the location, height, bulk, and size of buildings and structures. .

The project site currently has three zoning designations: Regional or Community Shopping Center (C-3A), Administrative and Professional Office (C-P), and Multiple Family Residential Zone (RD). Pursuant the City's Zoning Code Chapter 17.42, Uses permitted in the C-3A zone includes a variety of retail, service, and entertainment uses. Pursuant the City's Zoning Code Chapter 17.34, Uses permitted in the C-P zone includes

a variety of professional office and service uses. Also, Municipal Code Chapter 17.28 describes that allowable uses in the RD zone includes residential uses up to 22 dwelling units per acre.

5.9.3 ENVIRONMENTAL SETTING

Project Site

The 7.5-acre Specific Plan area includes four Planning Areas, as shown in Figure 3-7, *Project Planning Areas*. The existing buildings within the Project site total 110,542 square feet of residential and non-residential uses, as listed in Table 5.9-1 and described below.

Table 5.9-1: Specific Plan Planning Areas

Address	APN	Acres	Existing Land Use	Proposed Land Use
Planning Area 1				
1060 W San Bernardino	8434-018-020	0.96	Vacant Bowling (Covina Bowl)	Office/Commercial
Planning Area 2				
1060 W San Bernardino	8434-018-020	4.54	Vacant Bowling (Covina Bowl)	Residential
1103 W Badillo Street	8434-017-008		Vacant Day Care	
1111 W Badillo Street	8434-017-009		Church	
Planning Area 3				
1085 W Badillo Street	8434-018-021	0.35	Office	Office/Commercial/Residential
Planning Area 4				
1118 W San Bernardino	8434-017-007	1.71	Restaurant, Residential	Restaurant/Residential

The Covina Bowl and day care buildings are currently vacant. The other buildings onsite include: 32,589 square feet of restaurant use and the 31 multi-family residences within Planning Area 4; 1,646 square foot church within Planning Area 2; and 4,175 square feet of office within Planning Area 3. Approximately, 72,132 square feet of building area (approximately 65 percent) is currently vacant.

General Plan Land Use: As shown on Figure 3-5, *Existing General Plan Land Use Designations*, 77 percent of the Specific Plan area is currently designated for General Commercial (with a maximum FAR of 1.5) and 23 percent is designated as High Density Residential (14.1 to 22 dwelling units per acre).

Table 5.9-2: Existing General Plan Land Use Designations

Land Use	Acres	Percentage of the Specific Plan area
General Commercial	5.83	77%
High Density Residential	1.71	23%
Total	7.54	100%

Zoning: As shown in Figure 3-6, *Existing Zoning* and Table 5.9-3, *Existing Zoning Districts*, 73 percent of the Specific Plan area is zoned as Regional or Community Shopping Center (C-3A), 23 percent is zoned Multiple Family (RD), and 4 percent as Administrative and Professional Office (C-P).

Table 5.9-3: Existing Zoning Designations

Land Use	Acres	Percentage of the Specific Plan area
Regional or Community Shopping Center (C-3A)	5.48	73%
Multiple Family (RD)	1.71	23%
Administrative and Professional Office (C-P)	.35	4%
Total	7.54	100%

Surrounding Land Uses

The Specific Plan area is located in an urban and developed area. Surrounding land uses include:

North: W. San Bernardino Avenue (a 4-lane secondary arterial roadway) bounds the site to the north, followed by commercial, retail uses, and associated parking areas.

South: W. Badillo Street (a 2-lane collector roadway) bounds the site to the south, followed by single-family residential uses, associated structures, and driveways.

East: N. Rimsdale Avenue (a 4-lane primary arterial roadway) bounds the site to the east, followed by office and retail uses, and associated parking areas.

West: The Specific Plan area is bound to the west by multi-family residential and retail uses, including associated structures and parking areas.

5.9.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- LU-1 Physically divide an established community; or
- LU-2 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.

The Initial Study established that the project would result in no impacts related to Thresholds LU-1. No further assessment of this impact is required in this EIR.

5.9.5 METHODOLOGY

The analysis of land use consistency impacts considers whether the proposed Project would be inconsistent with (or conflict with) with regional and local plans, policies, and regulations that are applicable to the proposed Project site including the: SCAG RTP/SCS and City of Covina General Plan and zoning code.

Consistent with the scope and purpose of this EIR, this discussion primarily focuses on those goals and policies that relate to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. Thus, a project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts (as defined by CEQA Guidelines Section 15382).

Also, CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. A project need not be consistent with each and every policy and objective in a planning document. Rather, a project is considered consistent with the provisions of the

identified regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary goals of the land use plan or policy.

5.9.6 ENVIRONMENTAL IMPACTS

Impact LU-2: THE PROJECT WOULD NOT 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 analysis below, evaluates the consistency of the proposed Project with existing regional and City plans and policies. As described in detail below, the proposed Project would be consistent with applicable regional and local goals and policies that are intended to avoid or mitigate adverse environmental effects. Thus, impacts related to conflict with these plans, policies, and regulations would be less than significant.

SCAG Regional Transportation Plan Policies. As described above, SCAG RTP policies focus largely on transportation and the efficiency of transportation, which are not applicable to the proposed Project. However, the proposed Project would implement and is consistent with the SCAG policies that are listed in Table 5.9-4. Therefore, implementation of the Project would not result in conflict with SCAG policies, and impacts related to a SCAG RTP policy that was adopted for the purpose of avoiding or mitigating an environmental effect would not occur.

Table 5.9-4: Project Consistency with Applicable SCAG Regional Transportation Plan

RTP Goal	Proposed Project Consistency with Goal
1. Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent. The proposed Project would redevelop partially vacant buildings that would improve regional economics by providing an increase of employment and housing options and providing additional goods and services within Covina. Thus, the proposed Project is consistent with RTP Goal 1.
2. Maximize mobility and accessibility for all people and goods in the region.	Consistent. The proposed Project would implement new residential, commercial, and office uses near the I-10 freeway that would increase the accessibility of goods in the region due to access to regional transportation facilities. Thus, the proposed Project is consistent with RTP Goal 2.
3. Ensure travel safety and reliability for all people and goods in the region.	Consistent. The proposed Project does not involve regional travel improvements, but does provide street improvements, driveway accessibility, and a safe onsite circulation system (as detailed in Section 3.0, <i>Project Description</i>) that provides for reliable safe travel within and adjacent to the Project site. Thus, the proposed Project is consistent with RTP Goal 3.
4. Preserve and ensure a sustainable regional transportation system.	Consistent. As described above, the proposed Project does not involve regional travel improvements but does provide improvements within and adjacent to the site that provide connections to regional transportation systems. Thus, the proposed Project is consistent with RTP Goal 4.

RTP Goal	Proposed Project Consistency with Goal
5. Maximize the productivity of our transportation system.	Consistent. The proposed Project includes street improvements, driveway design, and site access planning to efficiently utilize surrounding roadways. Thus, proposed Project is consistent with RTP Goal 5.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	Consistent. As described in Section 3.0, <i>Project Description</i> , sidewalks would be installed on W. San Bernardino Road, N. Rimsdale Avenue, and along W. Badillo Street within the Project site. These facilities would facilitate active transportation. Thus, proposed Project is consistent with RTP Goal 6.
7. Actively encourage and create incentives for energy efficiency, where possible.	Consistent. As described in Section 5.4, <i>Energy</i> , the proposed Project includes design features that promote energy efficiency and sustainability. Thus, the proposed Project is consistent with RTP Goal 7.
8. Encourage land use and growth patterns that facilitate transit and active transportation.	<p>Consistent. As described in Section 3.0, <i>Project Description</i>, sidewalks would be installed on W. San Bernardino Road, N. Rimsdale Avenue, and along W. Badillo Street within the Project site. These facilities would facilitate active transportation.</p> <p>In addition, the Foothill Transit bus route runs adjacent to the north of the site with an existing stop on the southeast corner of W. San Bernardino Road and N. Rimsdale Avenue. The location of the project facilitates use of these existing routes.</p>
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Not Applicable. The proposed Project does not involve the security of the regional transportation system, or regional transportation system planning.

Land Use Consistency: As described previously, the Project site is currently designated by the General Plan for General Commercial and High Density Residential development. The proposed development would provide additional multi-family residential and commercial/office uses to the site. This would be consistent with the existing development within the Project site and adjacent areas. The site would provide additional housing for local employees and provide commercial retail or services for local residents and employees. The site would provide both vehicular and pedestrian access and would integrate into the existing land uses of the area.

Although, implementation of the proposed Project includes a General Plan Amendment to change the site's land use designations from General Commercial and High Density Residential (shown on Figure 3-5) to Specific Plan (SP), as shown in Figure 5.9-1, the same types of land uses would continue to occur onsite. The proposed SP land use designation would provide specific development standards and architectural guidelines for the site to coordinate with the existing Covina Bowl building and surrounding development.

The proposed Project land use designation would not result in a land use inconsistency. Rather, it would provide consistency with the existing area, the historic structure on the site, and would not conflict with a policy or plan adopted for the purpose of avoiding or mitigating an environmental effect. The General Commercial and High Density Residential land use designations do not provide avoidance of an environmental effect and the SP land use designation provides for development flexibility to design a

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Proposed General Plan Land Use



--- Specific Plan Area Boundary



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development that could avoid an environmental effect. Therefore, impacts related to land use inconsistency would be less than significant.

City of Covina General Plan Policies. A detailed analysis of the proposed Project's consistency with the applicable goals, policies, and objectives of the City's General Plan that serve to avoid or mitigate environmental impacts is provided in Table 5.9-5. As described, the proposed Project would be consistent with the relevant goals, policies, and objectives of the City's General Plan that avoid or mitigate environmental impacts, and impacts related to conflict with a General Plan policy related to an environmental effect would be less than significant.

Table 5.9-5: Project Consistency with Applicable General Plan Policies

General Plan Policy	Proposed Specific Plan Consistency with Policy
Land Use Element	
Policy 1.1.1: Ensure that the type, location, and intensity of all new and intensified developments adhere to the requirements and standards specified for their particular land use categories and the rest of the General Plan, zoning, plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered.	Consistent. The proposed Project would redevelop the site pursuant to the proposed Specific Plan that provides specific development criteria to ensure the new development references the historic structure and architecture on the site, provides sufficient parking, and adequate open space, which would further community goals, objectives, and policies. Thus, the proposed Project is consistent with Land Use Element Policy 1.1.1.
Policy 1.1.4: Accommodate growth that adequately serves existing and future residents, workers, shoppers, and others while protecting their health, safety, and welfare.	Consistent. The Project would provide new commercial/office space and multi-family residences that would accommodate growth and serve existing and future residents, workers, and shoppers. Thus, the proposed Project is consistent with Land Use Element Policy 1.1.4.
Policy 1.1.5: Accommodate growth that is consistent with current general land use patterns, that maintains existing relative land use quantities, and that respects physical and environmental resources and constraints.	Consistent. The project would redevelop the site with similar residential and commercial/office land uses that would be consistent with existing land use patterns on and adjacent to the site. Thus, the proposed Project is consistent with Land Use Element Policy 1.1.5.
Policy 1.1.6: Facilitate, through zoning provisions and applicable procedures, infill development, development of now-underutilized or vacant parcels, and, where necessary, redevelopment of deteriorating properties, particularly for housing creation and rehabilitation and economic development purposes.	Consistent. The proposed Project involves adaptive office reuse of deteriorating and underutilized buildings. Further, the new housing and commercial/office uses provided by the Project would assist economic development within the City. Therefore, the proposed Project is consistent with Land Use Element Policy 1.1.6.
Policy 1.1.9: Provide for the continuation of existing and development of new or expanded public streets and facilities, storm drains and other infrastructure, parking amenities, and utilities to support the City's land uses and meet all needs.	Consistent. As detailed in Section 3.0, <i>Project Description</i> , Section 5.8, <i>Hydrology and Water Quality</i> and Section 5.13, <i>Transportation</i> , the street and vehicular circulation improvements, as well as new parking amenities and utilities, that would be implemented by the Project would be completed to support the proposed uses. Therefore, the proposed Project would be consistent with Land Use Element Policy 1.1.9.
Policy 1.1.14: Require that future growth, infill, and revitalization activities be consistent with City-adopted positions, policies, and programs regarding regional planning and growth management matters—such as air quality attainment, recycling, hazardous waste	Consistent. The proposed Project would be consistent with City-adopted positions, policies, and programs regarding air quality attainment (as detailed in Section 5.2, <i>Air Quality</i>), recycling, hazardous waste management (as detailed in Section 5.7, <i>Hazards and</i>

General Plan Policy	Proposed Specific Plan Consistency with Policy
management, trip reduction, congestion management, stormwater runoff, water quality, housing, transportation, and circulation.	<i>Hazardous Materials</i>), trip reduction, congestion management, circulation, and transportation (as detailed in Section 5.13, <i>Transportation</i>), stormwater runoff and water quality (as detailed in Section 5.8, <i>Hydrology and Water Quality</i>), and housing as described throughout this Draft EIR. Therefore, the proposed Project would be consistent with Land Use Element Policy 1.1.14.
Policy 1.1.29: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure changes or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential land use and related impacts.	Consistent. The proposed Project has been appropriately evaluated pursuant CEQA through preparation of this Draft EIR. Thus, the proposed Project would be consistent with Land Use Element Policy 1.1.29.
Policy 1.2.9: Encourage that medium- to high-density complexes be developed in appropriately designated areas and replace old, deteriorating residential structures.	Consistent. The proposed Project would develop the site with high-density residential uses within an area that already contains high-density residential. Thus, the proposed Project is consistent with Land Use Element Policy 1.2.9.
Policy 1.2.14 Require, except where community goals, objectives, and policies are best furthered, that both new and remodeled residential developments comply with zoning and other standards, incorporate adequate amenities, and achieve a high level of architectural and site design quality to ensure a high quality of life for local residents and to ensure long-term building maintenance and viability.	Consistent. As detailed in Section 3.0, <i>Project Description</i> , the proposed development would incorporate amenities, such as lawn bowling, a community garden, and open space areas, as well as a high level of architectural and site design elements to compliment the historic architecture of the Covina Bowl, which would provide a high quality of life for residents and to ensure long-term building maintenance and viability. Therefore, the proposed Project would be consistent with Land Use Element Policy 1.2.14.
Policy 1.3.7: Accommodate new and expanded commercial and industrial developments, for community economic betterment and image enhancement and related reasons, in a fashion that neither adversely affects the integrity of established commercial and/or industrial areas nor unreasonably encroaches into residential neighborhoods and that does not impose an undue burden on local infrastructure or services.	Consistent. The commercial/office development implemented by the Project would replace existing vacant commercial facilities in a manner that would not affect the integrity of established commercial and/or industrial areas, would not encroach into residential neighborhoods, and as detailed throughout this EIR it would not impose an undue burden on local infrastructure or services. Thus, the proposed Project is consistent with Land Use Element Policy 1.3.7.
Policy 1.3.17: Encourage the revitalization or upgrading of deteriorating commercial and industrial structures through City, Redevelopment Agency, private development, and/or other efforts.	Consistent. The proposed Project would revitalize the Covina Bowl for adaptive office reuse through private development. Thus, the proposed Project is consistent with Land Use Element Policy 1.3.17.
Policy 2.1.1: Ensure that all developments adhere to the requirements and standards specified for their particular land use categories and the rest of the General Plan plus any other applicable plans or programs, except where community goals, objectives, and policies are best furthered.	Consistent. As detailed herein, the commercial/office and residential uses proposed by the Project would adhere to the requirements and standards of the General Plan plus any other applicable plans or programs. Thus, the proposed Project is consistent with Land Use Element Policy 2.1.1.
Policy 2.1.6: Require that parcels developed for commercial or industrial uses, when abutting residential	Consistent. The proposed mixed-use development has been designed to include setbacks, decorative 6-foot

General Plan Policy	Proposed Specific Plan Consistency with Policy
properties, incorporate buffers that adequately protect the residential properties from noise, light, trash, visual and environmental disturbances, vehicular traffic, and other factors. Such buffers shall include, but are not limited to, building setback and architecture, landscaping, walls, and other physical and aesthetic features.	high walls, building orientation design, and landscape buffers between different on and adjacent to the site. The proposed design would shield the existing and proposed residential uses from noise, light, trash, visual and environmental disturbances, vehicular traffic, and other factors. Further, the project would be implemented pursuant to the requirements of the municipal code that provide for shielding of light. Thus, the proposed Project is consistent with Land Use Element Policy 2.1.6.
Policy 2.1.13: Permit mixed uses (residential and commercial) in appropriate areas in the downtown and, if possible, elsewhere, in a manner consistent with special, applicable standards, to provide needed housing in an alternative setting and to complement districtwide physical and economic revitalization activities.	Consistent. The proposed Project would implement additional multi-family housing and commercial/office uses within an area developed with similar uses. Thus, the proposed Project is consistent with Land Use Element Policy 2.1.13.
Policy 2.1.17: Identify and encourage the retention and preservation of significant architectural, historical, and/or cultural resources.	Consistent. As described in Section 5.4, <i>Cultural Resources</i> , the Project site contains the Covina Bowl building, which is a historic resource. The proposed Project would redevelop the former Covina Bowl building for adaptive office reuse and would retain and preserve the most architecturally significant portions of the building. Thus, the proposed Project is consistent with Policy 2.1.17.
Policy 2.2.4: Accommodate various new housing types, including apartments built with density bonuses, “granny flats” or second units, and mixed use complexes, in a fashion that does not adversely affect the integrity of established residential areas and at numbers that will not inhibit the City’s ability to meet street capacities and to provide other infrastructure, utilities, and adequate community services.	Consistent. The proposed Project would develop new residential units in a currently established residential area and as detailed within this EIR, the project would not inhibit the City’s ability to meet street capacities and to provide other infrastructure, utilities, and adequate community services. Thus, the proposed Project would be consistent with Land Use Element Policy 2.2.4.
Policy 2.2.6: Orient medium- and high-density uses, such as apartments, condominiums, townhomes, and mobile home parks, in and/or around the downtown and in areas where such developments now exist.	Consistent. The proposed Project would develop new multi-family residential units in a currently established multi-family residential area. Thus, the proposed Project is consistent with Land Use Element Policy 2.2.6.
Policy 3.a: Achieve land use arrangements that provide for adequate separation and physical and visual buffers between land uses characterized by different functions, intensities, and/or densities to ensure their compatibility and to avoid conflicts.	Consistent. The proposed mixed-use development has been designed to include setbacks, decorative 6-foot high walls, building orientation design, and landscape buffers between different uses that are on and adjacent to the site. The proposed design would shield the existing and proposed residential uses from noise, light, and other potential conflicts. Thus, the proposed Project is consistent with Land Use Element Policy 3.a.
Policy 3.I: Enforce all Design Guidelines and Zoning provisions to ensure that all developments achieve a high degree of architectural integrity and landscaping, site design efficiency, good workmanship, a respect of physical and environmental constraints, and adequate amenities that enhance the quality of life for residents, workers, shoppers, and others, except in appropriate cases such as affordable housing construction, PCD	Consistent. As detailed in Section 3.0, <i>Project Description</i> , the proposed development would incorporate amenities, such as lawn bowling, a community garden, and open space areas, as well as a high level of architectural and site design elements to complement the historic architecture of the Covina Bowl, which would provide a high quality of life for residents

General Plan Policy	Proposed Specific Plan Consistency with Policy
(Planned Community Development) overlay district application, and/ or where community goals, objectives, and policies are best furthered.	and shoppers. Therefore, the proposed Project would be consistent with Land Use Element Policy 3.I.
Policy 5.f: Assess the impacts of incremental increases in development and housing units on emergency services and ensure, through the zoning-related Site Plan Review process, that new construction will not result in a reduction of law enforcement or fire protection services below acceptable levels.	Consistent. As discussed in Section 5.11, <i>Public Services</i> , the proposed Project would not result in a reduction of law enforcement or fire protection services below acceptable levels. Therefore, the proposed Project is consistent with Land Use Element Policy 5.f.
Policy 5.i: Assure that all existing, new, and/or expanded development address fire protection in a preventative manner by requiring in various developments fire protection and smoke detection systems and/or automatic sprinkler systems. Also, require that all new buildings incorporate adequate ingress and egress and encourage owners of existing, old structures to upgrade their exit systems and structural conditions.	Consistent. As discussed in Section 5.11, <i>Public Services</i> , the city's permitting process for development projects assures that fire protection systems and adequate ingress and egress is implemented pursuant to the California Fire Code. Therefore, the proposed Project is consistent with Land Use Element Policy 5.i.
Policy 5.j: Assure that all new or expanded medium to high density/intensity residential, commercial, and industrial projects address police protection in a preventative way by maximizing neighborhood surveillance opportunities in the siting and design of structures, utilizing sufficient lighting, and promoting defensible space concepts, such as ensuring visibility of open public areas.	Consistent. As discussed in Section 5.11, <i>Public Services</i> , the city's permitting process for development projects assures address police protection in a preventative way by ensuring sufficient lighting and promoting defensible space concepts, such as ensuring visibility of open public areas. Therefore, the proposed Project is consistent with Land Use Element Policy 5.j.
Circulation Element	
Policy 1.3: Maintain and, where administratively and financially possible, improve the physical condition, structural integrity, design capacity, utilization, appearance, and/or cleanliness of Covina's public rights-of-way and facilities, including, but not limited to, streets, alleys, sidewalks, medians, landscaping, parking areas, and miscellaneous infrastructure.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the proposed development includes an enlargement of the right-of-way N. Rimsdale Avenue along the easterly property frontage (westerly portion of the right-of-way) to provide for the addition of angled on-street parking spaces. In addition, the Project includes street trees along the modified right-of-way and landscaping along the street frontages. Therefore, the proposed Project would improve the physical condition and appearance of the area and is consistent with Circulation Element Policy 1.3.
Policy 1.4: Where necessary and feasible, conduct traffic circulation improvements and congestion mitigation measures, including, but not limited to, traffic signal installation, synchronization, or upgrade, lane restriping or modification, and/or speed limit, stop sign, or street light installation.	Consistent. As detailed in Section 5.13, <i>Transportation</i> , Mitigation Measure TR-1 is included to provide roadway improvements at the intersection of Azusa Avenue/Badillo Street (#9) that include addition of a third lane and modified approach lane configurations to improve cumulative traffic operation at the intersection. Therefore, the Project is consistent with Circulation Element Policy 1.4.
Policy 1.8: In conjunction with major development proposals or other situations on the most congested streets, consider requiring the detailed analysis of specific intersections at peak hours as a means of clarifying the operations of and better identifying	Consistent. As attached as Appendix L, and detailed in Section 5.13, <i>Transportation</i> , a Traffic Impact Study for the proposed Project was prepared which determined that Mitigation Measure TR-1 is required in the cumulative year 2040 with Project condition, which would provide roadway improvements at the intersection of

General Plan Policy	Proposed Specific Plan Consistency with Policy
acceptable or sufficient mitigation for particular roadway segments.	Azusa Avenue/Badillo Street (#9). Therefore, the proposed Project is consistent with Circulation Element Policy 1.8.
Policy 1.12: Ensure, where applicable, that private as well as public parking, drive-through, and drop-off/pick-up ingress/ egress locations off of public rights-of-way provide for sufficient access, circulation, maneuverability, visibility, and safety as well as separation from any residential or other sensitive adjacent uses and that all on-site parking facilities adequately serve their accompanying uses and are designed to facilitate safe, functionable, and viable circulation and maneuverability.	Consistent. As detailed in Section 5.13, <i>Transportation</i> , parking lots and driveways would be required to be installed in conformance with City design standards. The City's construction permitting process includes review of site plans to ensure that no potentially hazardous transportation design features would be introduced, and that the site would facilitate safe and functional circulation. Therefore, the proposed Project is consistent with Circulation Element Policy 1.12.
Policy 1.26: Ensure that all new and modified public streets and appurtenant components thereof and other infrastructure are designed in accordance with all applicable City standards, except where community goals, objectives, and policies are best furthered, and are designed so as to minimize construction and maintenance costs.	Consistent. The Project proposes partial encroachment on N. Rimsdale Avenue along the easterly property frontage for the addition of angled on-street parking spaces. The City's permitting process ensures that construction specifications are consistent with all applicable City standards prior to construction permit approval. Therefore, the proposed Project would be consistent with Circulation Element Policy 1.26.
Policy 5.1: For major developments, continue requiring builders/developers to incorporate various traffic congestion mitigation/reduction and additional infrastructure-related amenities and features into their projects, in accordance with the Covina Municipal Code and any other City or Redevelopment Agency provisions.	Consistent. As described previously and detailed in Section 5.13, <i>Transportation</i> , Mitigation Measure TR-1 is included to provide roadway improvements at the intersection of Azusa Avenue/Badillo Street (#9) that include addition of a third lane and modified approach lane configurations to improve cumulative traffic operation at the intersection. Also, the City's permitting process ensures that construction specifications are consistent with all applicable City standards prior to construction permit approval. Therefore, the proposed Project is consistent with Circulation Element Policy 5.1.
Policy 5.2: Follow, in a reasonable manner, through the Covina Site Plan Review and other processes, applicable portions of all Federal, State, regional, and County transportation plans/provisions, such as the Los Angeles County Congestion Management Program (CMP), that mandate traffic congestion mitigation and air pollution reduction measures be imposed on major private developments by, among other strategies, minimizing single-occupant trips, advancing alternative modes of transportation, and/or alleviating traffic-related impacts by requiring the incorporation of appropriate facilities into site design and the performing of necessary traffic impact analyses.	Consistent. As detailed in Section 5.13, <i>Transportation</i> , the proposed Project would not result in impacts related to the CMP. In addition, Mitigation Measure TR-1 is included to provide roadway improvements at the intersection of Azusa Avenue/Badillo Street (#9). Also, as shown in Section 5.2, <i>Air Quality</i> , the Project would not result in impacts related to air quality and mitigation is not required. Therefore, the proposed Project is consistent with Circulation Element Policy 5.2.
Policy 5.5: Balance the City's obligation to address certain traffic-, circulation-, and general infrastructure-related deficiencies with Covina's need to accommodate residential and nonresidential growth or to continue with ongoing communitywide economic development, commercial revitalization, neighborhood preservation, and affordable housing activities/programs.	Consistent. As described previously, the proposed Project provides for multi-family development along with new commercial/office uses that address growth and economic development. In addition, Mitigation Measure TR-1 is included to provide roadway improvements to accommodate the development in addition to projected

General Plan Policy	Proposed Specific Plan Consistency with Policy
	growth to the year 2040. Therefore, the proposed Project is consistent with Circulation Element Policy 5.2.
<p>Policy 5.13: Continue accommodating pedestrian circulation, to the greatest degree possible, in terms of adequately-sized, conveniently located, safe, functional, unobstructed, and disabled-accessible major- and small-street public sidewalks, public crosswalks, private walkways and access routes, private walkways/access route linkages to public sidewalks, and sufficient connections between public sidewalks and crosswalks.</p>	<p>Consistent. As discussed in Section 3.0, <i>Project Description</i>, the Project also includes pedestrian paths to provide for non-vehicular onsite circulation for connection to existing sidewalks and bike lanes adjacent to the Project site. Therefore, the proposed Project is consistent with Circulation Element Policy 5.2.</p>
<p>Policy 5.24: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential traffic, circulation, and/or infrastructure impacts.</p>	<p>Consistent. The proposed Project's impacts are analyzed in the context of existing (2020), Project opening year (2024), and future (2040) conditions by the Transportation Impact Study (TIS 2020) and Supplemental VMT Analysis (VMT 2020), which are included as Appendix L. In addition, Mitigation Measure TR-1 is included to provide roadway improvements to accommodate the development in addition to projected growth to the year 2040. Therefore, the proposed Project is consistent with Circulation Element Policy 5.2.</p>
<p>Policy 6.9: Continue requiring private developers and project proponents to construct street improvements and/or other infrastructure, where required and necessary, to mitigate development impacts.</p>	<p>Consistent. As described previously and detailed in Section 5.13, <i>Transportation</i>, Mitigation Measure TR-1 is included to require that the developer provide roadway improvements at the intersection of Azusa Avenue/Badillo Street (#9). Therefore, the proposed Project is consistent with Circulation Element Policy 6.9.</p>
<p>Policy 6.10: Continue requiring private developers and project proponents to perform traffic/circulation studies/analyses in particular areas or on certain streets or intersections thereof to mitigate development impacts.</p>	<p>Consistent. As described previously the proposed Project's impacts are analyzed by the Transportation Impact Study and Supplemental VMT Analysis, which are included as Appendix L. In addition, Mitigation Measure TR-1 is included to provide roadway improvements to accommodate the development in addition to projected growth to the year 2040. Therefore, the proposed Project is consistent with Circulation Element Policy 6.10.</p>
Housing Element	
<p>Policy 1.1: The City of Covina shall maintain and/or accommodate development of a variety of housing types, including single-family detached houses, condominiums/town homes, apartments, and mobile homes, second units/granny flats, and mixed uses, to suit all economic segments and as a means of addressing the City's regional housing obligations to the greatest extent possible.</p>	<p>Consistent. The proposed Project includes development of new multi-family residential units in a currently established residential and mixed-use area. Thus, the proposed Project would be consistent with Housing Element Policy 1.1.</p>
<p>Policy 1.2: The City of Covina shall maintain and consider to reasonably facilitate development of dwelling units particularly suitable for lower and moderate income residents, such as medium and high density apartments, condominiums/townhouses, second units, and mixed uses, to ensure lower and moderate income household accommodation.</p>	<p>Consistent. As described in Section 3.0, <i>Project Description</i>, the proposed Project includes development of 132 multi-family residential units, which is consistent with the dwelling types described by this policy. Therefore, the proposed Project would be consistent with Housing Element Policy 1.2.</p>

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Policy 1.3: The City of Covina shall maintain to the greatest extent practical areas zoned/designated for medium and high density residential facilities and for mobile homes.	Consistent. The proposed Project includes development of multi-family residential units adjacent to a residential area. Thus, the proposed Project is consistent Housing Element Policy 1.3.
Policy 1.5: The City of Covina shall permit and facilitate maximum feasible residential infill development or development of vacant and underutilized parcels through existing zoning provisions and new appropriate procedures as a means of providing a mix of housing for all economic segments and of meeting regional housing needs targets.	Consistent. The proposed Project includes infill and redevelopment of the site with 132 multi-family residential units. Therefore, the proposed Project is consistent with Housing Element Policy 1.5.
Policy 1.8: The City of Covina shall follow all General Plan and zoning density and development standards, except where community goals, objectives, and policies are best furthered.	Consistent. The proposed development of the project site pursuant to the proposed Specific Plan provides for development flexibility to further community goals, objectives, and policies. This includes providing for infill development of residential units, provision of additional commercial/office, and use of the existing historic structure on the site. Thus, the proposed Project is consistent with Housing Element Policy 1.8.
Policy 2.2: The City of Covina shall accommodate new housing of various types and densities that reflect the use, scale, and character of existing and/or planned residential uses.	Consistent. The proposed Project would develop new multi-family residential units adjacent to existing apartments, while reflecting the historic characteristics of the Covina Bowl building. Thus, the proposed Project would be consistent with Housing Element Policy 2.2.
Policy 3.4: The City of Covina shall maintain development and site design standards, architectural and landscaping guidelines, and amenity requirements for all housing types to ensure attractive, functional, and high quality building construction and additions.	Consistent. The proposed Specific Plan includes design guidelines and architectural and landscaping guidelines. Thus, the proposed Project is consistent with Housing Element Policy 3.4.
Policy 3.11: The City of Covina shall ensure that State noise insulation standards for applicable apartments and condominiums/town homes are met.	Consistent. As discussed in Section 5.9, <i>Noise</i> , the proposed development would comply with all State noise insulation standards through compliance with the City's development standards and permitting processes. Thus, the proposed Project would be consistent with Housing Element Policy 3.11.
Policy 3.14: The City of Covina shall preserve residential districts and buildings in the community that are deemed architecturally and/or historically significant.	Consistent. As described in Section 5.4, <i>Cultural Resources</i> , the project site contains the Covina Bowl building, which is a historic resource. The proposed redevelopment the former Covina Bowl within Planning Area 1 for adaptive office reuse and would retain and preserve the most architecturally significant portions of the building. In addition, the Project would provide for additional residential development on the site. Thus, the proposed Project is consistent with Housing Element Policy 3.14.
Natural Resources and Open Space Element	
<i>Natural Resources</i>	
Policy 1.m: Follow the City's Water-Efficient Landscape Ordinance for the sites of new and significantly	Consistent. As detailed in Section 3.0, <i>Project Description</i> , the proposed landscaping would use water efficient landscaping and irrigation systems that would

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expanded/remodeled developments as a viable conservation tool.	follow the City's Water-Efficient Landscape Ordinance. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 1.m.
Policy 1.n: Encourage the incorporation of water conservation features in the design of all new and significantly expanded/remodeled developments and in the installation of conservation devices in existing developments, including, but not limited to, low-flow toilets and shower registers.	Consistent. As detailed in Section 3.0, <i>Project Description</i> , the proposed Project would comply with the California Green Building Standards Code ([CALGreen]; California Code of Regulations, Title 24, Part 11), which includes installation of water conservation features, such as low flow water fixtures. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 1.n.
Policy 1.o: Comply with applicable portions of Federal, State, regional, and County plans and programs pertaining to air pollution mitigation/air quality enhancement by following, in a manner that recognizes local needs, issues, views, and policy and financial constraints, various vehicular emissions-reducing and traffic congestion-reducing land use and transportation control and energy conservation measures, proposals, and policies outlined in the Land Use and Circulation Elements, to the greatest extent feasible and practical.	Consistent. As described in Section 5.2, <i>Air Quality</i> , the proposed Project would comply with all applicable regulations and the emissions generated from buildout of the proposed Project would not exceed either federal or state thresholds. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 1.o.
Policy 1.u: Encourage and, where necessary, require the incorporation of energy conservation features in the design of all new and significantly expanded/remodeled private and public developments and encourage the installation of conservation devices in existing developments to increase energy efficiency and decrease pollution emissions from off-site electrical power plants and on-site natural gas use.	Consistent. The proposed Project would comply with all CalGreen (Title 24) Building Codes relative to energy efficiency, which would be verified by the City during the building permitting process. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 1.u.
Policy 2.g: Require that new and significantly expanded/remodeled private, quasi-public, and public developments, including parking lots, incorporate adequate landscaping, in accordance with City zoning, design guidelines, and general landscape installation provisions, for both aesthetic and ecological reasons.	Consistent. As discussed in Section 3.0, <i>Project Description</i> , the project includes new ornamental landscaping throughout the development area that would include decorative elements, and a variety of trees, shrubs, and ground covers with both aesthetic and ecological benefits in accordance with the City's municipal code requirements and the design guidelines within the proposed Project. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 2.g.
Policy 3.f: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, particularly those in or abutting natural resource areas, to address all applicable potential impacts, including, but not limited to, land use, circulation, noise, and aesthetics.	Consistent. The proposed Project has been appropriately evaluated pursuant to the California Environmental Quality Act (CEQA) through preparation of this Draft EIR. As described herein, impacts to natural resource areas would not occur from implementation of the proposed Project. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 3.f.
<i>Open Space</i>	
Policy 1.h: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when	Consistent. The proposed Project has been appropriately evaluated pursuant to the California

General Plan Policy	Proposed Specific Plan Consistency with Policy
reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, particularly those in or abutting natural resource areas, to address all applicable potential impacts, including, but not limited to, land use, circulation, noise, and aesthetics.	Environmental Quality Act (CEQA) through preparation of this Draft EIR. As described herein, impacts to natural resource areas would not occur from implementation of the proposed Project. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 1.h.
Policy 6.p: Continue to require new and significantly enlarged or remodeled single-family detached residences plus apartment, condominium/townhouse, and, if appropriate, mixed use projects to provide sufficient, on-site open space and, if appropriate, recreational amenities, in accordance with City zoning and design guidelines provisions, to accommodate residents and to supplement public facilities.	Consistent. As detailed in Section 3.0, <i>Project Description</i> , the proposed development would comply with the City's zoning and other standards, and includes open space areas with amenities, such as lawn bowling, a community garden, and open space areas. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 6.p.
Policy 6.q: Continue to require sufficient building setbacks and/or, if appropriate, open space facilities in new and significantly enlarged or remodeled commercial, industrial, institutional, and other non-residential proposals, in accordance with City zoning and Design Guidelines provisions, for visual relief and, if applicable, to supplement public facilities.	Consistent. The proposed mixed-use development has been designed to include building setbacks, decorated walls, landscaping, and open space with facilities, such as lawn bowling, a community garden, which are in accordance with City zoning guidelines. Thus, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 6.q.
Policy 6.z: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential impacts on open space lands, including, but not limited to, land use, circulation, noise, and aesthetics.	Consistent. The proposed project has been appropriately evaluated pursuant to the California Environmental Quality Act (CEQA) through preparation of this Draft EIR. As described herein, impacts to open space lands would not occur from implementation of the proposed Project. Therefore, the proposed Project would be consistent with Natural Resources and Open Space Element Policy 6.z.
Safety Element	
Policy 1.a: Require all new and expanded or improved buildings and structures to comply with current seismic-related codes, standards, and construction practices.	Consistent. As described in Section 5.6, <i>Geology and Soils</i> , and included as PPP GEO-1, the development pursuant to the proposed Project is required to comply with the California Building Code (CBC) as included in the City's Municipal Code to comply with current seismic-related codes, standards, and construction practices. CBC related and geologist and/or civil engineer specifications for the development shall be incorporated into grading plans and building specifications as a condition of construction permit approval. Therefore, the proposed Project is consistent with Safety Element Policy 1.a.
Policy 1.b: Require adequate soils, geologic, and/or structural studies/evaluations prior to any building construction, particularly in the Covina Hills area, to identify appropriate, development-accommodating engineering and development siting measures.	Consistent. As described in previously and detailed in in Section 5.6, <i>Geology and Soils</i> , a Geotechnical Investigation has been prepared for the proposed development that identifies appropriate, development-accommodating engineering and development siting measures, pursuant to the CBC, to preclude significant adverse effects associated with geologic, structural, and soils hazards. In addition, the Project is not located in the

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	Covina Hills area. Therefore, the proposed Project is consistent with Safety Element Policy 1.b.
Policy 2.c: Continue to require that all new and significantly expanded developments incorporate sufficient measures to mitigate flood hazards, including the design of on-site drainage systems to link with citywide flood control infrastructure, the gradation of sites such that runoff does not impact adjacent private properties or structures, and the location of structures above and away from any flooding elevation.	Consistent. As described in Section 5.8, <i>Hydrology and Water Quality</i> , a Project is required to have City reviewed and approved drainage/hydrology, a Preliminary Low Impact Development Plan, and a Preliminary Hydrology Report has been prepared that details the stormwater runoff and the adequate capacity of the proposed drainage system. Therefore, the Project is consistent with Policy 2.c.
Policy 2.j: Require the use of the greatest amount of landscaping feasible in new and significantly expanded developments to maximize permeable surface area to reduce site runoff as well as for aesthetic purposes, particularly along or near the unimproved portion of Walnut Creek.	Consistent. As described in Section 3.0, <i>Project Description</i> , the Project includes new ornamental landscaping, including a variety of trees, shrubs, and ground covers that would provide for site runoff and improve site aesthetics. In addition, Project is not located near any portion of Walnut Creek. Therefore, the Project is consistent with Policy 2.j.
Policy 3.b: Maintain all fire-inhibiting Building and Safety and Fire Department requirements and standards for new construction and for substantial additions to existing structures, including those for fire-resistant building materials; fire-resistant roofing components (untreated wood-shakes being prohibited); building construction; detector and alarm systems; fire service equipment; automatic fire sprinklers; one-hour fire walls; clearances around structures; accessibility to and into buildings; and the proper storage of flammable and combustible materials.	Consistent. The proposed development would consist of fire-inhibiting materials and would be consistent with the California Fire Code, as included in Chapter 14.02.10 of the City's Municipal Code and verified through the City's building permitting process. Therefore, the Project would be consistent with Safety Element Policy 3.b.
Policy 3.c: Maintain all fire-inhibiting Planning Department requirements and standards for new construction and for substantial additions to existing structures, including those for architectural design, site planning, building setback, landscape design, minimum road and driveway widths, and property usage and maintenance.	Consistent. As described previously, the proposed redevelopment would utilize fire-resistant building materials and be consistent with the California Fire Code, as included in Chapter 14.02.10 of the City's Municipal Code and verified through the City's building permitting process. Therefore, the Project is consistent with Safety Element Policy 3.c.
Policy 4.p: Require proposed commercial and industrial projects/activities to be conditioned to comply with California's general storm water permits and with the Clean Water Act.	Consistent. As described in Section 5.9, <i>Hydrology and Water Quality</i> , a Preliminary Low Impact Development Plan and a Preliminary Hydrology Report have been prepared, which provide for compliance with California's general storm water permits and the Clean Water Act. Therefore, the proposed Project would be consistent with Safety Element Policy 4.p.
Policy 4.q: Require erosion and sediment controls for developments to minimize erosion-related damages and the spillover of sediments to adjacent sites.	Consistent. As described in Section 5.9, <i>Hydrology and Water Quality</i> , a Preliminary Low Impact Development Plan and a Preliminary Hydrology Report have been prepared, which include BMPs to control erosion and minimize erosion-related damages. Therefore, the Project is consistent with Policy 4.q.

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Policy 4.ii: Require all new development in Covina to be connected to public sewers.	Consistent. The Project site is currently connected to the public sewer and would remain connected to the sewer with redevelopment of the site. Therefore, the proposed Project is consistent with Safety Element Policy 4.ii.
Policy 5.dd: Where appropriate, apply standards for defensible space in reviewing new and expanded developments to best promote personal security. (Defensible space refers to planning and design techniques that can be used to discourage crime. The concept was developed by Oscar Newman in his book "Defensible Space: Crime Prevention Through Urban Design.")	Consistent. As described in Section 5.12, <i>Public Services</i> , the proposed Project would include installation of security features, such as the provision of low-intensity security lighting in parking areas and adjacent to building structures and other crime prevention measures that would be reviewed by the Sheriff's Department and the City during the permitting process. Therefore, the proposed Project would be consistent with Safety Element Policy 5.dd.
Policy 5.pp: Continue to maintain a coordinated, cooperative, and inter-departmental approach in reviewing new or expanded/alterd public and private developments and uses and temporary activities through administering the Covina Site Plan Review and Building Permit Issuance processes to facilitate implementation of all City public safety-related codes and standards or to ensure that City Fire, Police, Building and Safety, Planning, and other officials can best comment on all aspects of the proposals involving public safety, including, but not limited to, building and roofing materials; fire sprinklers (if required); alarms and related features; emergency vehicle accessibility/circulation with respect to streets, driveways, parking aisles, clearances around structures, and/or driveway approaches; emergency vehicle parking and unloading; response times; water pressure; defensible space; traffic; lighting; impacts on surrounding areas; and overall structural adequacy as well as the impacts of the projects on existing services/resources. These reviews shall take place at the earliest possible point to permit changes in the proposal, if necessary.	Consistent. Development proposed by the Project would be reviewed through the Covina Site Plan Review and Building Permit Issuance processes to ensure compliance Fire, Police, Building and Safety, Planning, and other regulations that are required. Therefore, the proposed Project is consistent with Policy 5.pp.
Policy 5.uu: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential general safety and public safety impacts.	Consistent. The proposed Project has been appropriately evaluated pursuant to the California Environmental Quality Act (CEQA) through preparation of this Draft EIR. As described herein, impacts to general safety and public safety would not occur. Therefore, the proposed Project would be consistent with Policy 5.uu.
Noise Element	
Policy 1.1: 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.	Consistent. As described in Section 5.10, <i>Noise</i> , a Noise Impact Analysis was prepared and is included as Appendix K. As detailed in the analysis the operational noise levels would be within the City of Covina 60 dBA Leq daytime and 50 dBA Leq nighttime exterior noise level standards at residential land uses and the 65 dBA Leq daytime and 55 dBA Leq nighttime exterior noise level standards at commercial land uses. Therefore, the

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	operational noise impacts related to noise standards would be less than significant. In addition, development would require inclusion of insulation in compliance with State standards. Therefore, the proposed Project is consistent with Noise Element Policy 1.1.
Policy 1.2: 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.	Consistent. As detailed in the analysis the operational noise levels would be within the City of Covina 60 dBA Leq daytime and 50 dBA Leq nighttime exterior noise level standards at residential land uses and the 65 dBA Leq daytime and 55 dBA Leq nighttime exterior noise level standards at commercial land uses. Therefore, the operational noise impacts related to noise standards would be less than significant. In addition, development would require inclusion of insulation in compliance with State standards. Therefore, the proposed Project is consistent with Noise Element Policy 1.2.
Policy 1.6: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.	Consistent. As described previously, the operational noise levels would be within the City of Covina 60 dBA Leq daytime and 50 dBA Leq nighttime exterior noise level standards at residential land uses and the 65 dBA Leq daytime and 55 dBA Leq nighttime exterior noise level standards at commercial land uses. Therefore, the operational noise impacts related to noise standards would be less than significant. In addition, development would require inclusion of insulation in compliance with State standards. Therefore, the proposed Project would be consistent with Noise Element Policy 1.6.
Policy 1.14: 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.	Consistent. As described previously and detailed in Section 5.11, Noise, the location of driveways and parking would not result in noise impacts on the adjacent noise-sensitive uses. Thus, the proposed Project is consistent with Noise Element Policy 1.14.
Policy 2.3: 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.	Consistent. As described previously and detailed in Section 5.11, Noise, the proposed residential housing, which is part of the mixed-use development has been considered and evaluated as a “noise-sensitive use”. Therefore, the proposed Project is consistent with Noise Element Policy 2.3.
Policy 2.4: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.	Consistent. As described in Section 5.11, Noise, the proposed development would not result in impacts related to noise. However, Mitigation Measure NOI-1 was included to reduce potential impacts related to construction vibration to a less than significant level. Therefore, the proposed Project is consistent with Noise Element Policy 2.4.
Policy 2.5: Require that parking lots and structures and loading areas be designed to minimize on-site noise impacts and off-site incursions by calling for the use of appropriate walls, buffers, and materials and by insisting upon the configuration of on-site or interior	Consistent. As described previously and detailed in Section 5.11, Noise, impacts from operation and construction of the development would result in less than significant noise impacts. The design of the development includes setbacks and 6-foot high perimeter block walls to reduce encroachment of offsite noise sources.

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spaces that minimize sound amplification and transmission.	Therefore, the proposed Project is consistent with Noise Element Policy 2.5.
Policy 2.12: Ensure that commercial or industrial buildings are constructed soundly to prevent adverse noise transmission onto adjacent businesses.	Consistent. As shown in Figure 3-8, Conceptual Site Plan, the orientation and vehicular access to the proposed commercial/office uses in the Covina Bowl building are orientated towards N. Rimsdale Avenue and away from the proposed residential uses. Noise from the commercial/office uses would be orientated toward the street right-of ways. Therefore, the Project is consistent with Noise Element Policy 2.12.
Policy 2.13: Ensure that condominium/townhouse and apartment structures are constructed soundly to prevent adverse noise transmission onto adjacent dwelling units.	Consistent. As described in Section 5.11, <i>Noise</i> , in a “windows closed” condition with standard windows with a minimum Sound Transmission Class (STC) of 27, the interior noise levels of the residential units would be below the City’s interior noise standards. Therefore, impacts related to interior noise would be less than significant. In addition, the City’s permitting process would ensure that all construction plans are consistent with State Title 24 insulation and construction materials standards. Therefore, the Project is consistent with Noise Element Policy 2.13.
Policy 2.24: Require that commercial uses developed as part of a mixed use project (e.g., residential dwelling units situated above commercial businesses) not be noise-intensive, except where determined to be appropriate through appropriate features and mitigation.	Consistent. As detailed in Section 3.0, <i>Project Description</i> , the proposed commercial/office uses within the mixed-use development would be designed for a variety of uses, which include but are not limited to administrative offices, retail, coffee shop/bakery and other uses commonly found in neighborhood commercial zones in accordance with City zoning and design guidelines that are not noise-intensive. Therefore, the proposed Project would be consistent with Noise Element Policy 2.24.
Policy 2.25: Require that mixed use structures be designed to prevent the transfer of noise and vibration from the commercial activity to the residential use.	Consistent. As described in Section 5.11, <i>Noise</i> , in a “windows closed” condition with standard windows with a minimum STC of 27, the interior noise levels of the residential units would be below the City’s interior noise standards. Therefore, impacts related to interior noise would be less than significant. In addition, the City’s permitting process would ensure that all construction plans are consistent with State Title 24 insulation and construction materials standards to prevent transfer of noise between onsite uses. Therefore, the Project is consistent with Noise Element Policy 2.25.
Policy 2.26: Require that common walls and doors between commercial and residential uses be constructed so as to minimize the transmission of noise and vibration.	Consistent. As described previously and in Section 5.11, <i>Noise</i> , in a “windows closed” condition with standard windows construction, the interior noise levels of the residential units would be below the City’s interior noise standards. In addition, the City’s permitting process would ensure that all construction plans are consistent with State Title 24 insulation and construction materials standards to prevent transfer of noise between onsite uses. Therefore, the Project is consistent with Noise Element Policy 2.26.

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Policy 2.27: Orient mixed use residential units away from major noise sources, to the greatest degree possible.	Consistent. As shown in Figure 3-8, <i>Conceptual Site Plan</i> , the orientation and vehicular access to the proposed commercial/office uses in the Covina Bowl building are orientated towards N. Rimsdale Avenue and away from the proposed residential uses. Noise from the commercial/office uses would be orientated toward the street right-of ways and not toward the residential uses. Thus, the proposed Project would be consistent with Noise Element Policy 2.27.
Policy 2.28: Locate balconies and openable windows of residential units in mixed use projects away from major noise sources, to the greatest degree possible.	Consistent. As described previously and shown in Figure 3-8, <i>Conceptual Site Plan</i> , the orientation and vehicular access to the proposed commercial/office uses in the Covina Bowl building are orientated towards N. Rimsdale Avenue and away from the proposed residential uses. The orientation of the residential units would not be toward any major noise sources. Thus, the proposed Project would be consistent with Noise Element Policy 2.28.
Policy 2.29: Continue supporting Federal and State standards pertaining to interior noise levels of commercial and industrial businesses.	Consistent. As described in Section 5.11, <i>Noise</i> , development pursuant to the proposed Project would comply with the State Title 24 insulation and construction materials standards, as a condition of construction permit approval, which include regulations pertaining to interior noise levels. Therefore, the proposed Project is consistent with Noise Element Policy 2.29.
Policy 3.2: Encourage the installation of quiet residential air conditioners and outside appliances and devices, with proper installation procedures.	Consistent. As described in Section 5.11, <i>Noise</i> , the proposed HVAC units would not result in noise impacts and City permitting would ensure appropriate installation. Therefore, the proposed Project is consistent with Noise Element Policy 3.2.
Policy 4.1: Continue implementing the Covina Noise Ordinance to regulate the hours of operation and excessive noise associated with on-site construction activities, particularly activities occurring in or near residential uses, permitting exceptions only under special circumstances.	Consistent. As described in Section 5.11, <i>Noise</i> , the proposed Project would not result in noise that would exceed the regulations of the City's Noise Ordinance. Therefore, the proposed Project is consistent with Noise Element Policy 4.1.
Policy 4.2: Where necessary, require the construction of barriers to shield noise-sensitive uses from intrusive, construction related noise.	Consistent. As described in Section 5.11, <i>Noise</i> , construction of the proposed development would result in less than significant noise impacts, and noise barriers are not necessary. Therefore, the proposed Project is consistent with Noise Element Policy 4.2.
Policy 4.3: Require that construction activities incorporate feasible and practical techniques, measures, and procedures that minimize the noise impacts on all adjacent uses.	Consistent. As described previously and in Section 5.11, <i>Noise</i> , construction and operation of the proposed development would result in less than significant noise impacts. Therefore, the proposed Project is consistent with Noise Element Policy 4.3.
Policy 4.4: Consider requiring sound attenuation devices on construction equipment to reduce noises associated with building activities.	Consistent. As described in Section 5.11, <i>Noise</i> , construction permitting includes requirements that construction equipment have effective noise control equipment, as intended by the manufacturer. Also,

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	construction noise impacts would be less than significant. Therefore, the proposed Project is consistent with Noise Element Policy 4.4.
Policy 4.8: Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alterations or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential noise impacts.	Consistent. The proposed Project has been evaluated pursuant to CEQA through preparation of this Draft EIR. All applicable potential noise impacts have been addressed in Section 5.10, Noise, and the Noise Impact Analysis, included as Appendix K. Therefore, the proposed Project would be consistent with Safety Element Policy 4.8.

Zoning Code

The proposed Project would re-designate the area as Specific Plan but would maintain the same base zoning uses. As shown on Figure 5.9-2, Planning Area 1 would be designated as Covina Bowl Specific Plan (CBSP) Commercial/Office; Planning Area 2 would be designated as CBSP Residential (RD); Planning Area 3 would be designated as CBSP Mixed Use; and Planning Area 4 would be designated as CBSP Mixed Use.

Thus, the same types of land uses would continue to occur on the site under the revised zoning. However, the proposed SP land use designation would provide specific development standards for the site to coordinate with the existing Covina Bowl building and surrounding development. The proposed Specific Plan zoning designation would provide for consistency with the existing area. Therefore, impacts related to the proposed zone change would not occur from the proposed Project.

5.9.7 CUMULATIVE IMPACTS

The cumulative study area for land use and planning includes the City of Covina and the nearby areas in the City of West Covina and the County of Los Angeles. The proposed Project provides for redevelopment of the site with new mixed-uses that are similar to the existing multi-family, commercial, and office uses that are on and adjacent to the site. The proposed Project provides for infill development that is consistent with existing uses, and land use impacts would not occur. As shown in Table 5-1 and Figure 5-1, there are no cumulative projects located adjacent to or within the local vicinity of the Project site. In addition, a large portion of the cumulative projects consist of multi-family residential, commercial, and office development. These related projects are similar and consistent to the proposed Project. Thus, the types of development that would occur from implementation of the proposed Project in addition to the cumulative projects would not combine to be cumulatively considerable.

Also, as described previously, the proposed Project would not result in conflicts with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the area, which has the purpose of avoiding or mitigating an environmental effect. Thus, the proposed Project would not generate an environmental impact that could cumulatively contribute to impacts from related projects. As a result, cumulative impacts related to land use and planning would not occur from implementation of the proposed Project.

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Proposed Zoning



--- Specific Plan Area Boundary



5.9.8 EXISTING PLANS, PROGRAMS, OR POLICIES

There are no Plans, Programs, or Policies related to Land Use and Planning.

5.9.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact LU-2 would be less than significant.

5.9.10 MITIGATION MEASURES

No mitigation measures are required.

5.9.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Thus, impacts related to land use and planning would be less than significant.

REFERENCES

City of Covina General Plan. Accessed: <https://covinaca.gov/pc/page/general-plan>

City of Covina Municipal Code. Accessed: <https://www.codepublishing.com/CA/Covina>

5.10 Noise

5.10.1 INTRODUCTION

This EIR section evaluates the potential noise impacts that would result from implementation of the proposed Project. It discusses the existing noise environment within and around the Project site, as well as the regulatory framework for regulation of noise. This section analyzes the effect of the proposed Project on the existing ambient noise environment during demolition, construction, and operational activities; and evaluates the Project's noise effects for consistency with relevant local agency noise policies and regulations. This section includes data from the Noise Impact Analysis (NOI 2020), Prepared by Urban Crossroads, included as Appendix K.

Noise and Vibration Terminology

Various noise descriptors are utilized in this EIR analysis, and are summarized as follows:

dB: Decibel, the standard unit of measurement for sound pressure level.

dBA: A-weighted decibel, an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

Lx: The sound level that is equaled or exceeded "x" percent of a specified time period. The "x" thus represents the percentage of time a noise level is exceeded. For instance, L50 and L90 represents the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

Ldn: Also termed the "day-night" average noise level (DNL), Ldn is a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of nighttime noises.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

The "ambient noise level" is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be by those hearing it. With regard to increases in A-weighted noise levels, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3-dBA change in noise levels is considered to be a barely perceivable difference.
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of 6 dBA per doubling of distance from the source over hard surfaces to 7.5 dBA per doubling of distance from the source over hard surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a noise measured at 90 dBA 50 feet from the source would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. In addition to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles)

attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.

Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

5.10.2 REGULATORY SETTING

Title 24, California Building Code

State regulations related to noise include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as the California Noise Insulation Standards and are found in California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of DNL 45 dBA in any habitable room and, where such units are proposed in areas subject to noise levels greater than DNL 60 dBA require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment.

The mandatory measures for non-residential buildings states that new construction shall provide an interior noise level that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation. Title 24 standards are included in the City's Municipal Code in Section 14.02.010(N) and are enforced through the building permit application process in the City.

City of Covina General Plan Noise Element

The City's Noise Element includes standards related to excessive noise levels. The following existing goal and policies in the Noise Element are relevant to the proposed Project.

Policy 1.1: 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.

Policy 1.2: 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.

Policy 1.3: 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.

Policy 1.6: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.

Policy 2.2: Discourage the location of noise-sensitive land uses in noise environments.

Policy 2.3: 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.

Policy 2.4: Require noise-reduction techniques and features in site planning, architectural design, project landscaping, building materials, and/or construction, where necessary or required by law.

Policy 2.13: Ensure that condominium/townhouse and apartment structures are constructed soundly to prevent adverse noise transmission onto adjacent dwelling units.

Policy 2.19: Continue enforcing the Covina Noise Ordinance and maintaining coordination among City departments/ divisions involved in noise abatement.

Policy 2.22: Evaluate and make recommendations on potential noise impacts of permanent developments and uses through environmental or noise-related studies or analyses and, for minor work, by observing project plans as well as the potential noise impacts of temporary activities and special events.

Policy 2.24: Require that commercial uses developed as part of a mixed use project (e.g., residential dwelling units situated above commercial businesses) not be noise-intensive, except where determined to be appropriate through appropriate features and mitigation.

Policy 2.25: Require that mixed use structures be designed to prevent the transfer of noise and vibration from the commercial activity to the residential use.

Policy 3.2: Encourage the installation of quiet residential air conditioners and outside appliances and devices, with proper installation procedures.

Policy 3.1: Continue implementing the Covina Noise Ordinance to regulate the hours of operation and excessive noise associated with on-site construction activities, particularly activities occurring in or near residential uses, permitting exceptions only under special circumstances.

Policy 3.2: Where necessary, require the construction of barriers to shield noise-sensitive uses from intrusive, construction-related noise.

Policy 3.3: Require that construction activities incorporate feasible and practical techniques, measures, and procedures that minimize the noise impacts on all adjacent uses.

City of Covina Municipal Code

Municipal Code Section 9.40.040, Exterior Noise Standards: Table 5.10-1 provides the City's Municipal Code exterior noise standards.

Table 5.10-1: City of Covina Exterior Noise Standards

Land Use	7:00 a.m. – 10:00 p.m.	10:00 p.m. - 7:00 a.m.
Residential Estate or Agricultural	50 dBA	40 dBA
Residential Low Density	55 dBA	45 dBA
Residential Medium and High Density	60 dBA	50 dBA
Commercial	65 dBA	55 dBA
Industrial	70 dBA	60 dBA

Source: Municipal Code Section 9.40.040

Municipal Code Section 9.40.060, Interior Noise Level Limits: Table 5.10-2 provides the Municipal Code interior noise level limits for residential dwellings that apply to a windows closed condition.

Table 5.10-2: City of Covina Municipal Code Interior Noise Standards

Land Use	7:00 a.m. – 10:00 p.m.	10:00 p.m. - 7:00 a.m.
Residential (All Densities)	45 dBA Leq (1-hr)	35 dBA Leq (1-hr)

Source: Municipal Code Section 9.40.060

Municipal Code Section 9.40.060 further specifies that the above standards shall not be exceeded by 5 dBA Leq for a cumulative period of more than one minute or more in any hour, or 10 dBA or the maximum measured ambient for any period of time. Subsection F states all newly constructed residential dwellings located in areas that are exposed to ambient noise levels in excess of 60 dBA DNL be designed and built so all habitable rooms comply with these standards.

Municipal Code Section 9.40.090, Controlled Hours of Operation: It is unlawful for any period to operate, permit, use, or cause to operate any of the following other than between the hours of 7:00 AM and 8:00 PM of any one day:

- Powered model vehicles;
- Loading and unloading vehicles such as garbage trucks, forklifts, or cranes in a residential area or within 500 feet of a residence;
- Domestic power tools;
- Lawn equipment, including, but not limited to: lawn mowers, edgers, cultivators, chainsaws, and leaf blowers in any residential area or within 500 feet of any residence;
- Equipment associated with the repair and maintenance of any real property.

Municipal Code Section 9.40.110, Construction: It is unlawful to operate equipment or perform outside construction or repair work within 500 feet of a residential land use between the hours of 8:00 PM of any one day and 7:00 AM of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance.

Municipal Code Section 9.40.120, Loud and Unusual Noises. Prohibits the operation of any device that creates a vibration that is above the vibration perception threshold of an average individual at or beyond the property boundary of the source if on a private property or at 150 feet from the source if on a public space or public right-of-way. Per Section 9.40.020(30) the threshold of perception is considered by the City to be 0.01 in/sec.

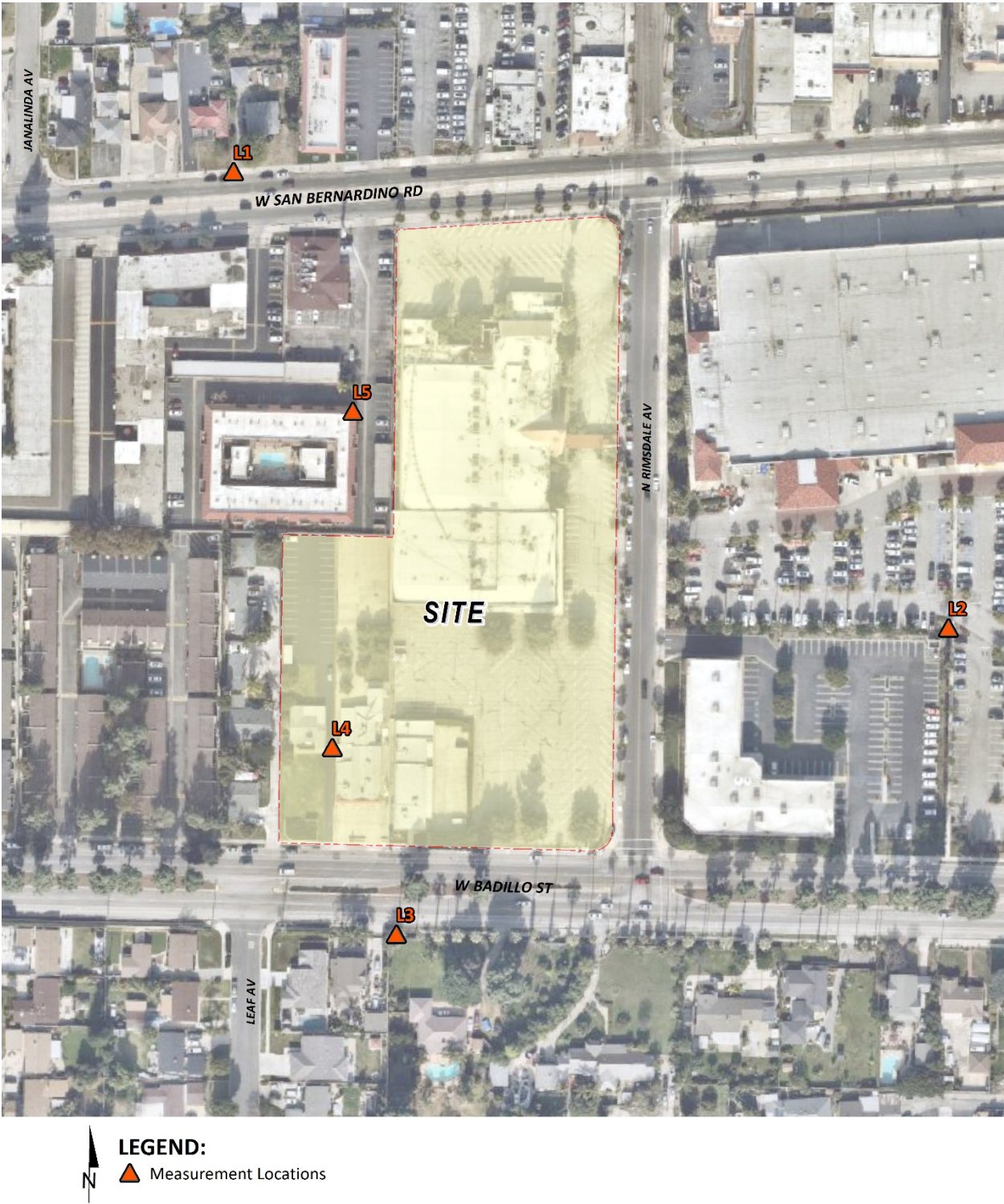
5.10.3 ENVIRONMENTAL SETTING

Existing Noise Levels

To assess the existing noise level environment, 24-hour noise level measurements were taken at 5 locations on Wednesday, May 6, 2020, which are shown in Figure 5.10-1. A description of these locations and the existing noise levels are provided below and listed in Table 5.10-3.

- Location L1 represents the noise levels north of the Project site on W. San Bernardino Road near existing single-family home at 1123 W. San Bernardino Road. The noise level measurements collected show an overall 24-hour exterior noise level of 71.3 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 68.6 dBA L_{eq} with an average nighttime noise level of 63.1 dBA L_{eq} .
- Location L2 represents the noise levels east of the Project site in the parking lot of Home Depot. The noise level measurements collected show an overall 24-hour exterior noise level of 59.2 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 55.0 dBA L_{eq} with an average nighttime noise level of 52.0 dBA L_{eq} .
- Location L3 represents the noise levels south of the Project site on W. Badillo Street near existing single-family residence at 1108 Badillo Street. The noise level measurements collected show an overall 24-hour exterior noise level of 69.1 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 65.2 dBA L_{eq} with an average nighttime noise level of 61.6 dBA L_{eq} .
- Location L4 represents the noise levels by the western boundary of the Project site near the existing single-family residence at 1119 W. Badillo Street. The noise level measurements collected show an overall 24-hour exterior noise level of 60.6 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 59.5 dBA L_{eq} with an average nighttime noise level of 51.7 dBA L_{eq} .
- Location L5 represents the noise levels northwest of the Project site by the Covina Bonita Apartments at 1130 W. San Bernardino Road. The 24-hour CNEL indicates that the overall exterior noise level is 58.0 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 52.4 dBA L_{eq} with an average nighttime noise level of 51.1 dBA L_{eq} .

Noise Measurement Locations



Source: Urban Crossroads

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Table 5.10-3: Summary of 24-Hour Ambient Noise Level Measurements

Location	Description	Energy Average Noise Level (dBA L _{eq})		CNEL
		Daytime	Nighttime	
L1	Located north of the Project site near existing single-family home at 1123 W. San Bernardino Road.	68.6	63.1	71.3
L2	Located east of the Project site in the parking lot of Home Depot.	55.0	52.0	59.2
L3	Located south of the Project site near an existing single-family residence at 1108 W. Badillo Street.	65.2	61.6	69.1
L4	Located by the western boundary of the Project site near the existing single-family residence at 1119 W. Badillo Street.	59.5	51.7	60.6
L5	Located northwest of the Project site by the Covina Bonita Apartments at 1130 W. San Bernardino Road.	52.4	51.1	58.0

Source: Urban Crossroads, 2020, Appendix J.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

In addition, the Noise Impact Analysis modeled the existing roadway volumes (detailed in the Traffic Impact Study) to identify the existing traffic noise from roadways near the Project site. As shown in Table 5.10-4, the existing roadway noise near the Project site ranges from 61.0 to 69.8 dBA CNEL.

Table 5.10-4: Existing Noise Contours

ID	Road	Segment	Receiving Land Use	CNEL at Nearest Receiving Land Use (dBA) ¹	Distance to Contour from Centerline (Feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Lark Ellen Av.	n/o Cypress St.	Sensitive	68.6	RW	69	149
2	Lark Ellen Av.	s/o Cypress St.	Sensitive	68.0	RW	63	136
3	Lark Ellen Av.	s/o San Bernardino Rd.	Sensitive	69.0	RW	74	158
4	Lark Ellen Av.	n/o Puente Av.	Sensitive	69.8	RW	83	180
5	Rimsdale Av.	s/o San Bernardino Rd.	Non-Sensitive	61.0	RW	RW	46
6	Azusa Av.	n/o Cypress St.	Non-Sensitive	68.4	RW	84	181
7	Azusa Av.	n/o San Bernardino Rd.	Non-Sensitive	68.3	RW	83	178
8	Azusa Av.	s/o Badillo St	Sensitive	68.7	RW	88	189
9	Azusa Av.	s/o Puente Av.	Sensitive	69.3	RW	96	208
10	Hollenbeck Av.	n/o San Bernardino Rd.	Sensitive	66.7	RW	52	112
11	Hollenbeck Av.	s/o Badillo St	Sensitive	66.3	RW	49	105
12	San Bernardino Rd.	w/o Lark Ellen Av.	Sensitive	69.1	RW	76	163
13	San Bernardino Rd.	e/o Rimsdale Av.	Non-Sensitive	67.9	RW	62	134
14	San Bernardino Rd.	e/o Hollenbeck Av.	Sensitive	65.0	RW	40	86
15	Badillo St.	w/o Lark Ellen Av.	Sensitive	69.0	RW	93	200
16	Badillo St.	w/o Azusa Av.	Sensitive	68.0	RW	80	172
17	Badillo St.	e/o Armel Dr.	Sensitive	67.8	RW	77	166
18	Puente Av.	w/o Lark Ellen Av.	Sensitive	65.8	RW	57	122
19	Puente Av.	e/o Azusa Av.	Sensitive	66.6	RW	51	109

Source: Urban Crossroads, 2020.

¹ The CNEL is calculated at the boundary of the roadway right-of-way and the property line of the nearest receiving land use.

"RW" = Location of the respective noise contour falls within the right-of-way of the road.

Sensitive Receptors

General Plan Policies 1.3 and 2.3, state that “noise-sensitive uses” 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.

The Project site currently contains a church and 31-unit apartment complex, which are considered by the City of Covina to be sensitive receptors. The closest sensitive receptors are shown on Figure 5.10-2 and include:

- R1: Location R1 represents the existing noise sensitive residence at 1123 W. San Bernardino Road, approximately 201 feet northwest of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R1 is at the residential building façade facing the Project site.
- R2: Location R2 represents the existing office building at 1041 W. Badillo Street, approximately 87 feet east of the Project site.
- R3: Location R3 represents the residence at 1112 W. Badillo Street, approximately 130 feet south of the Project site. Receiver R3 is at the building façade facing the Project site.
- R4: Location R4 represents the residence at 1119 W. Badillo Street, approximately 12 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site R4 is at building façade facing the Project site.
- R5: Location R5 represents the Continental Garden Apartments within Planning Area 4, approximately 15 feet east of the construction area within Planning Area 2. Receiver R5 is placed at the building façade.

5.10.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- NOI-2 Generate excessive groundborne vibration or groundborne noise levels;
- NOI-3 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.

The Initial Study established that the Project would result in no impact related to Threshold NOI-3; no further assessment of this impact is required in this EIR.

Construction Noise and Vibration

- The Project could result in a noise related impact if construction activities:
 - Occur between the hours of 8:00 p.m. and 7:00 a.m. of the next day, or on Sundays or public

Noise Reciever Locations



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holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance (City of Covina Municipal Code Section 9.40.110)

- Create noise levels which exceed the 85 dBA Leq acceptable noise level threshold at the nearby sensitive receiver locations (National Institute for Occupational Safety and Health (NIOSH) Criteria for Recommended Standard: Occupational Noise Exposure); or
- If Project-related construction activities generate vibration levels which exceed the Covina Municipal Code, Section 9.40.020(30), RMS vibration threshold of 0.01 in/sec at receiver locations.

Off-Site Traffic Noise

- The Project would result in a noise related impact if the noise levels at existing and future noise-sensitive land uses (e.g. residential, etc.):
 - Are less than 60 dBA CNEL and the Project creates a *readily perceptible* 5 dBA CNEL or greater project-related noise level increase; or
 - Range from 60 to 65 dBA CNEL and the Project creates a *barely perceptible* 3 dBA CNEL or greater project-related noise level increase; or
 - Already exceeds 65 dBA CNEL, and the project creates a community noise level impact of greater than 1.5 dBA CNEL.
- The Project would result in a noise related impact if the noise levels at existing and future non-noise-sensitive land uses (e.g. office, commercial, etc.):
 - are less than the OPR General Plan Guidelines, Figure 2, *normally acceptable* 70 dBA CNEL and the Project creates a *readily perceptible* 5 dBA CNEL or greater noise level increase; or
 - are greater than the OPR General Plan Guidelines, Figure 2, *normally acceptable* 70 dBA CNEL and the Project creates a *barely perceptible* 3 dBA CNEL or greater noise level increase.

On-Site Traffic Noise

- The Project would result in a noise related impact if the on-site noise levels:
 - exceed an interior noise level of 45 dBA Leq daytime or 35 dBA Leq nighttime of residential uses (City of Covina Municipal Code 9.40.060); or

Operational Noise

- The Project would result in a noise related impact if Project related operational (stationary source) noise levels:
 - exceed the exterior 60 dBA Leq daytime or 50 dBA Leq nighttime noise level standards at nearby sensitive residential receiver locations (City of Covina Municipal Code, Section 9.40.040).
 - exceed the exterior 65 dBA Leq daytime or 55 dBA Leq nighttime noise level standards at nearby commercial receiver locations (City of Covina Municipal Code, Section 9.40.040).
- The Project would result in a noise related impact if the existing ambient noise levels at the nearby noise-sensitive receivers:
 - are less than 60 dBA Leq and the Project creates a *readily perceptible* 5 dBA Leq or greater Project-related noise level increase; or

- range from 60 to 65 dBA L_{eq} and the Project creates a *barely perceptible* 3 dBA L_{eq} or greater Project-related noise level increase; or
- already exceed 65 dBA L_{eq} , and the Project creates a community noise level increase of greater than 1.5 dBA L_{eq} .

5.10.5 METHODOLOGY

Construction Noise

To identify the temporary construction noise contribution to the existing ambient noise environment, the construction noise levels anticipated from usage of construction equipment needed to implement the proposed Project were combined with the existing ambient noise level measurements at the sensitive receiver locations. The construction noise levels are compared against the thresholds listed previously to assess the level of significance associated with temporary construction noise level impacts.

Operational Noise

The primary source of noise associated with the operation of the proposed Project would be from vehicular trips. The expected roadway noise level increases from vehicular traffic were calculated using the Federal Highway Administration (FHWA) traffic noise prediction model and the average daily traffic volumes from the Traffic Impact Analysis prepared for the proposed Project.

As detailed in Section 5.14, *Transportation*, the proposed mixed-use development within Planning Areas 1 and 2 is anticipated to generate a net increase of approximately 1,081 daily trips, 133 a.m. peak hour trips and 97 p.m. peak hour trips. In addition, buildout of Planning Areas 3 and 4 in 2040 would generate a net increase of approximately 834 daily trips, of these 94 are p.m. peak hour trips. The increase in noise levels generated by the vehicular trips have been quantitatively estimated and compared to the applicable noise standards and thresholds of significance listed previously.

Secondary sources of noise would include new stationary sources (such as heating, ventilation, and air conditioning units) associated with the new buildings on the Project site. The increase in noise levels generated by these activities have been quantitatively estimated and compared to the applicable noise standards listed previously.

Vibration

Aside from noise levels, groundborne vibration would also be generated during construction of the Project by various construction-related activities and equipment; and could be generated by truck traffic traveling to and from the Project site. The potential ground-borne vibration levels resulting from construction activities occurring from the proposed Project were estimated by data published by the Federal Transit Administration (FTA). Thus, the groundborne vibration levels generated by these sources have also been quantitatively estimated and compared to the applicable thresholds of significance listed previously.

5.10.6 ENVIRONMENTAL IMPACTS

IMPACT NOI-1: THE PROJECT WOULD NOT GENERATE A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES.

Construction

Less than Significant. Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction is expected to occur in the following stages: demolition, excavation and grading, building construction, architectural coating, paving. Noise levels generated by heavy construction equipment can range from approximately 59.2 dBA to 73.5 dBA when measured at 50 feet, as shown on Table 5.10-5.

Table 5.10-5: Construction Reference Noise Levels

ID	Noise Source	Reference Distance From Source	Reference Noise Levels @ Reference Distance (dBA Leq)	Reference Noise Levels @ 50 Feet (dBA Leq)
1	Truck Pass-Bys & Dozer Activity	30'	63.6	59.2
2	Dozer Activity	30'	68.6	64.2
3	Construction Vehicle Maintenance Activities	30'	71.9	67.5
4	Foundation Trenching	30'	72.6	68.2
5	Rough Grading Activities	30'	77.9	73.5
6	Framing	30'	66.7	62.3
7	Concrete Mixer Truck Movements	50'	71.2	71.2
8	Concrete Paver Activities	30'	70.0	65.6
9	Concrete Mixer Pour & Paving Activities	30'	70.3	65.9
10	Concrete Mixer Backup Alarms & Air Brakes	50'	71.6	71.6
11	Concrete Mixer Pour Activities	50'	67.7	67.7

Source: Urban Crossroads, 2020.

Noise levels are calculated at 50 feet using a drop off rate of 6 dBA per doubling of distance (point source).

However, per Municipal Code Section 9.40.110, noise sources associated with construction activities are exempt from the City's established noise standards as long as the activities do not take place within 500 feet of a residential land use between the hours of 8:00 PM of any one day and 7:00 AM of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the proposed Project would be in compliance with the City's construction related noise standards.

Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. The construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators.

As detailed on Table 5.10-6, construction noise as close as 12 and 15 feet away from receiver locations during construction within Planning Areas 1 and 2 (shown on Figure 5.10-3) would range from 67.4 to 76.4 dBA Leq, which would not exceed the 85 dBA Leq daytime construction noise level threshold. Construction within Planning Areas 3 and 4 would occur at similar distances of 12 and 15 feet from receiver

locations; and therefore, would result in the same noise levels that would not exceed the threshold. Overall, construction noise impacts would be less than significant.

Table 5.10-6: Construction Noise Levels at Receptor Locations

Receiver Location	dBA Leq						
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels
R1	64.0	67.4	65.6	63.7	63.3	57.3	67.4
R2	66.3	69.7	67.9	66.0	65.6	59.6	69.7
R3	73.0	76.4	74.6	72.7	72.3	66.3	76.4
R4	72.6	76.0	74.2	72.3	71.9	65.9	76.0
R5	68.9	72.3	70.5	68.6	68.2	62.2	72.3

Source: Urban Crossroads, 2020.

Operation

On-Site Operational Noise Generation

Less than Significant. Operational noise would occur from stationary equipment such as heating, ventilation, and air conditioning (HVAC) units that would be installed for the new buildings, use of parking facilities, trash removal activity, and activity at outdoor recreation areas. As described previously, the Project includes development of residences, which would be sensitive receivers. Typical noise levels from onsite operations at 50 feet from the noise source include roof-top air conditioning units at 57.2 dBA L₅₀ and parking lot vehicle movements at 41.7 dBA L₅₀.

The Noise Impact Analysis calculated the operational source noise levels that would be generated by implementation of Planning Areas 1 and 2 and the noise increases that would be experienced at the closest sensitive receptor locations. Table 5.10-7 shows the operational noise levels during the daytime hours at the sensitive receptor locations would range from 34.7 to 42.3 dBA Leq.

Table 5.10-7: Daytime Operational Noise Levels

Noise Source	dBA Leq				
	R1	R2	R3	R4	R5
Roof-Top Air Conditioning Units	39.0	34.5	37.7	42.2	39.7
Parking Lot Vehicle Movements	29.7	20.7	22.2	26.7	29.1
Total (All Noise Sources)	39.5	34.7	37.8	42.3	40.1

Source: Urban Crossroads, 2020.

Table 5.10-8 shows the operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the sensitive receptor locations with implementation of Planning Areas 1 and 2 would range from 32.4 to 40.0 dBA Leq.

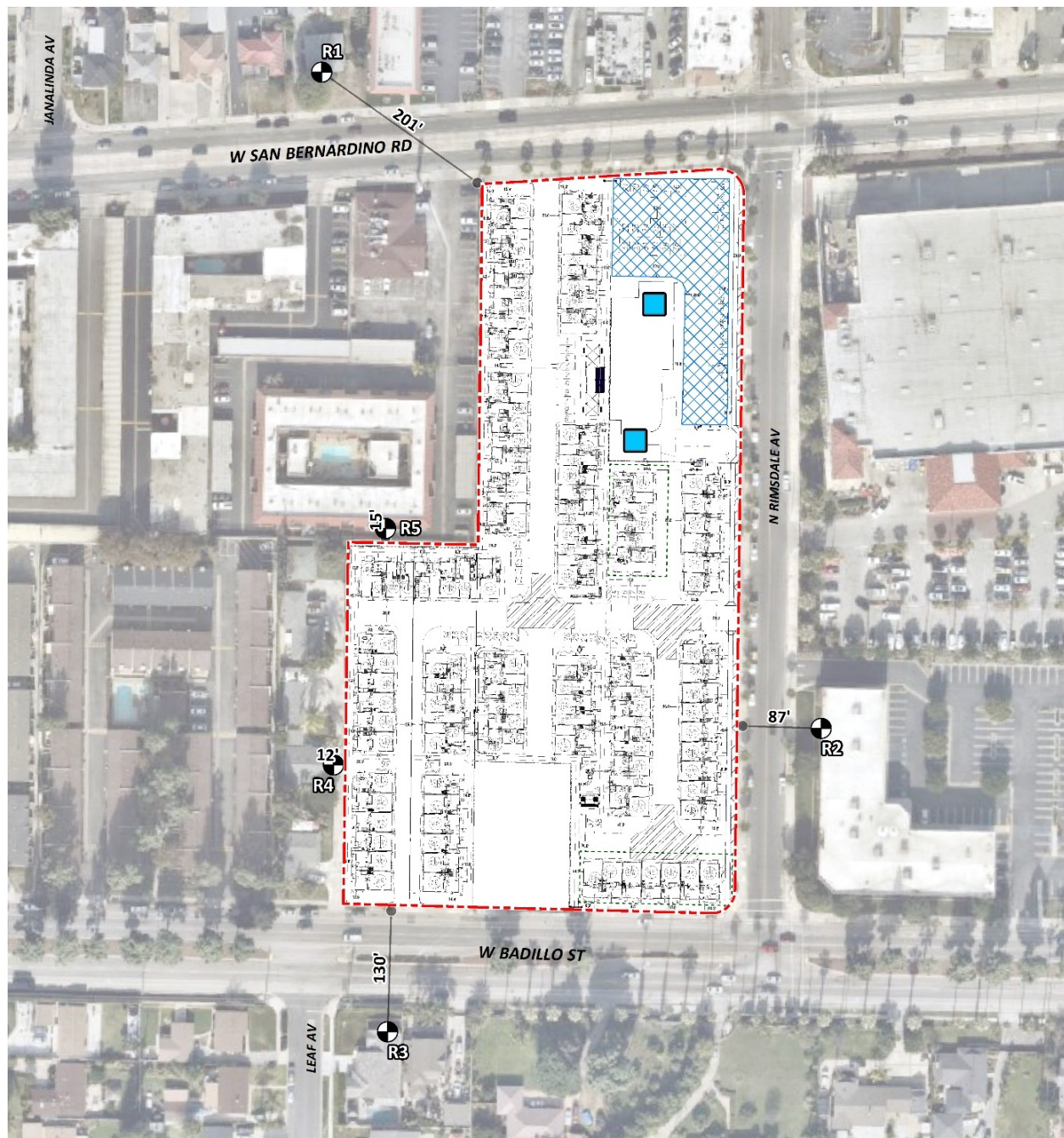
Table 5.10-8: Nighttime Operational Noise Levels

Noise Source	dBA Leq				
	R1	R2	R3	R4	R5
Roof-Top Air Conditioning Units	36.6	32.1	35.3	39.8	37.3
Parking Lot Vehicle Movements	29.7	20.7	22.2	26.7	29.1
Total (All Noise Sources)	37.4	32.4	35.5	40.0	37.9

Source: Urban Crossroads, 2020.

Table 5.10-9 shows the operational noise levels be within the City of Covina 60 dBA Leq daytime and 50 dBA Leq nighttime exterior noise level standards at residential land uses and the 65 dBA Leq daytime and 55 dBA Leq nighttime exterior noise level standards at commercial land uses with implementation of

Operational Noise Source and Reciever Locations



LEGEND:

Site Boundary

Receiver Locations

Distance from receiver to Project site boundary (in feet)

Roof-Top Air Conditioning Unit

Parking Lot Vehicle Movements

Source: Urban Crossroads

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Planning Areas 1 and 2. Therefore, the operational noise impacts related to noise standards would be less than significant.

Table 5.10-9: Operational Noise Level Compliance

Receiver Location	Receiving Land Use	Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	Residential	39.5	37.4	60	50	No	No
R2	Commercial	34.7	32.4	65	55	No	No
R3	Residential	37.8	35.5	60	50	No	No
R4	Residential	42.3	40.0	60	50	No	No
R5	Residential	40.1	37.9	60	50	No	No

Source: Urban Crossroads, 2020.

Operation of buildout of Planning Areas 3 and 4 would include similar retail and multi-family residential uses at similar distances of 12 and 15 feet from receiver locations; and therefore, would result in the same noise levels that would be less than significant. Although, no specific development is proposed for Planning Areas 3 and 4; and the location of new sensitive receivers and/or noise generating uses are currently unknown, the proposed Specific Plan includes Design Guidelines to incorporate buffers that adequately protect sensitive receivers from noise that exceeds the City's municipal code requirements, which would be verified during the City's permitting process. Therefore, impacts related to operational noise sources from implementation of Planning Areas 3 and 4 would be less than significant.

On-Site Operational Noise Level Increase

Less than Significant. To describe the operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels at the nearby receptor locations. The increase from the ambient noise levels describe the Project related noise increase. As shown on Tables 5.10-10 and 5.10-11, the Project would generate daytime and nighttime operational noise level increases ranging from 0.0 to 0.5 dBA Leq at the nearby receptor locations, which is a less than significant increase.

Table 5.10-10: Daytime Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded
R1	39.5	L1	68.6	68.6	0.0	1.5	No
R2	34.7	L2	55.0	55.0	0.0	5.0	No
R3	37.8	L3	65.2	65.2	0.0	1.5	No
R4	42.3	L4	59.5	59.6	0.1	5.0	No
R5	40.1	L5	52.4	52.6	0.2	5.0	No

Source: Urban Crossroads, 2020.

Table 5.10-11: Nighttime Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	39.5	L1	63.1	63.1	0.0	3.0	No
R2	34.7	L2	52.0	52.1	0.1	5.0	No
R3	37.8	L3	61.6	61.6	0.0	3.0	No
R4	42.3	L4	51.7	52.2	0.5	5.0	No
R5	40.1	L5	51.1	51.4	0.3	5.0	No

Source: Urban Crossroads, 2020.

Off-Site Traffic Noise

Less than Significant

The proposed Project would generate traffic related noise from operation. As described in Section 3.0, *Project Description*, the proposed Project provides access from W. San Bernardino Road, N. Rimsdale Avenue and W. Badillo Street. To identify the potential of traffic from the proposed Project to generate noise impacts, modeling of vehicular noise on area roadways was conducted by the Noise Impact Analysis (Appendix I). The tables below provide a summary of the exterior traffic noise levels for the area roadway segments in the without and with Project conditions.

Opening Year (2024) with Project Conditions. In the opening year (2024) with operation of Planning Areas 1 and 2 (Table 5.10-12) noise would range from 61.2 to 70.0 dBA CNEL. Implementation of Planning Areas 1 and 2 would generate a noise level increase of up to 0.1 dBA CNEL on the study area roadway segments, which is less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts in the opening year plus project condition would be less than significant.

Table 5.10-12: Opening Year (2024) with Specific Plan Off-Site Traffic Noise

ID	Road	Segment	Sensitive Land Use?	CNEL at Receiving Land Use (dBA)			Noise Level Increase Threshold	
				No Project	With Project	Increase	Limit	Exceeded?
1	Lark Ellen Av.	n/o Cypress St.	Sensitive	68.8	68.9	0.1	1.5	No
2	Lark Ellen Av.	s/o Cypress St.	Sensitive	68.2	68.3	0.1	1.5	No
3	Lark Ellen Av.	s/o San Bernardino Rd.	Sensitive	69.2	69.2	0.0	1.5	No
4	Lark Ellen Av.	n/o Puente Av.	Sensitive	70.0	70.0	0.0	1.5	No
5	Rimsdale Av.	s/o San Bernardino Rd.	Non-Sensitive	61.2	61.2	0.0	5.0	No
6	Azusa Av.	n/o Cypress St.	Non-Sensitive	68.6	68.7	0.1	5.0	No
7	Azusa Av.	n/o San Bernardino Rd.	Non-Sensitive	68.6	68.6	0.0	5.0	No
8	Azusa Av.	s/o Badillo St	Sensitive	69.0	69.0	0.0	1.5	No
9	Azusa Av.	s/o Puente Av.	Sensitive	69.6	69.6	0.0	1.5	No
10	Hollenbeck Av.	n/o San Bernardino Rd.	Sensitive	67.0	67.0	0.0	1.5	No
11	Hollenbeck Av.	s/o Badillo St	Sensitive	66.6	66.6	0.0	1.5	No
12	San Bernardino Rd.	w/o Lark Ellen Av.	Sensitive	69.5	69.6	0.1	1.5	No
13	San Bernardino Rd.	e/o Rimsdale Av.	Non-Sensitive	68.2	68.2	0.0	5.0	No
14	San Bernardino Rd.	e/o Hollenbeck Av.	Sensitive	65.4	65.5	0.1	1.5	No
15	Badillo St.	w/o Lark Ellen Av.	Sensitive	69.3	69.3	0.0	1.5	No
16	Badillo St.	w/o Azusa Av.	Sensitive	68.3	68.3	0.0	1.5	No
17	Badillo St.	e/o Armel Dr.	Sensitive	68.0	68.1	0.1	1.5	No
18	Puente Av.	w/o Lark Ellen Av.	Sensitive	66.1	66.1	0.0	1.5	No
19	Puente Av.	e/o Azusa Av.	Sensitive	66.8	66.8	0.0	1.5	No

Source: Urban Crossroads, 2020.

Year 2040 with Project Conditions. In 2040 with operation of all four Planning Areas (Table 5.10-13) noise would range from 61.5 to 70.4 dBA CNEL. Implementation of all four Planning Areas would generate a noise level increase of up to 0.2 dBA CNEL on the study area roadway segments, which is less than the 1.5 dBA CNEL threshold. Thus, off-site traffic noise impacts in the 2040 plus operation of all four Planning Areas would be less than significant.

Table 5.10-13: Year 2040 with Specific Plan Off-Site Traffic Noise Impacts

ID	Road	Segment	Sensitive Land Use	CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase Threshold	
				No Project	With Project	Increase	Limit	Exceeded?
1	Lark Ellen Av.	n/o Cypress St.	Sensitive	69.2	69.2	0.0	1.5	No
2	Lark Ellen Av.	s/o Cypress St.	Sensitive	68.6	68.6	0.0	1.5	No
3	Lark Ellen Av.	s/o San Bernardino Rd.	Sensitive	69.5	69.6	0.1	1.5	No
4	Lark Ellen Av.	n/o Puente Av.	Sensitive	70.4	70.4	0.0	1.5	No
5	Rimsdale Av.	s/o San Bernardino Rd.	Non-Sensitive	61.5	61.5	0.0	5.0	No
6	Azusa Av.	n/o Cypress St.	Non-Sensitive	69.0	69.0	0.0	5.0	No
7	Azusa Av.	n/o San Bernardino Rd.	Non-Sensitive	68.9	68.9	0.0	5.0	No
8	Azusa Av.	s/o Badillo St	Sensitive	69.3	69.3	0.0	1.5	No
9	Azusa Av.	s/o Puente Av.	Sensitive	69.9	70.0	0.1	1.5	No
10	Hollenbeck Av.	n/o San Bernardino Rd.	Sensitive	67.3	67.3	0.0	1.5	No
11	Hollenbeck Av.	s/o Badillo St	Sensitive	66.9	66.9	0.0	1.5	No
12	San Bernardino Rd.	w/o Lark Ellen Av.	Sensitive	69.9	70.0	0.1	1.5	No
13	San Bernardino Rd.	e/o Rimsdale Av.	Non-Sensitive	68.5	68.7	0.2	5.0	No
14	San Bernardino Rd.	e/o Hollenbeck Av.	Sensitive	65.8	65.8	0.0	1.5	No
15	Badillo St.	w/o Lark Ellen Av.	Sensitive	69.6	69.7	0.1	1.5	No
16	Badillo St.	w/o Azusa Av.	Sensitive	68.6	68.7	0.1	1.5	No
17	Badillo St.	e/o Armel Dr.	Sensitive	68.4	68.5	0.1	1.5	No
18	Puente Av.	w/o Lark Ellen Av.	Sensitive	66.5	66.5	0.0	1.5	No
19	Puente Av.	e/o Azusa Av.	Sensitive	67.2	67.2	0.0	1.5	No

Source: Urban Crossroads, 2020.

Interior Noise

Less than Significant. Using the FHWA traffic noise prediction model, the Noise Impact Analysis determined that the exterior noise levels at the first-floor building façades would range from 54.4 to 67.1 dBA CNEL. Thus, the interior noise levels were analyzed by the Noise Impact Analysis to identify if the interior noise would exceed the Municipal Code Standard interior noise level standard of 45 dBA CNEL in the daytime and 35 dBA CNEL at nighttime.

Tables 5.10-14 through 5.10-16 show that the daytime exterior noise levels at the first, second and third floor would range from 27.7 to 40.8 dBA Leq and would satisfy the 45 dBA Leq daytime interior noise level standards. Also, the nighttime exterior noise levels at the first, second and third-floor building façades would range from 19.9 to 34.9 dBA Leq and would satisfy the 35 dBA Leq nighttime interior noise level standards. Overall, in a “windows closed” condition with standard windows with a minimum Sound Transmission Class (STC) of 27, the interior noise levels of the residential units would be below the City’s interior noise standards. Therefore, impacts related to interior noise would be less than significant.

Table 5.10-14: First Floor Residential Interior Noise Levels (CNEL)

Unit	Exterior Noise Levels (dBA Leq) ¹		Interior Noise Levels (dBA Leq) ²		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
98	64.5	56.6	39.5	31.6	45	35	No	No
55	65.8	58.0	40.8	33.0	45	35	No	No
131	53.3	45.5	28.3	20.5	45	35	No	No

Source: Urban Crossroads, 2020.

¹ Exterior noise level at the facade with a windows closed condition requiring a means of mechanical ventilation.² A minimum of 25 dBA exterior to interior noise reduction is assumed with standard building construction.

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Table 5.10-15: Second Floor Residential Interior Noise Levels (CNEL)

Receiver Location	Exterior Noise Levels (dBA Leq) ¹		Interior Noise Levels (dBA Leq) ²		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
98	64.3	56.5	39.3	31.5	45	35	No	No
55	65.7	59.9	40.7	34.9	45	35	No	No
131	53.1	45.3	28.1	20.3	45	35	No	No

Source: Urban Crossroads, 2020.

¹ Exterior noise level at the facade with a windows closed condition requiring a means of mechanical ventilation.² A minimum of 25 dBA exterior to interior noise reduction is assumed with standard building construction.

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Table 5.10-16: Third Floor Residential Interior Noise Levels (CNEL)

Unit	Exterior Noise Levels (dBA Leq) ¹		Interior Noise Levels (dBA Leq) ²		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
98	63.9	56.1	38.9	31.1	45	35	No	No
55	65.3	57.5	40.3	32.5	45	35	No	No
131	52.7	44.9	27.7	19.9	45	35	No	No

Source: Urban Crossroads, 2020.

¹ Exterior noise level at the facade with a windows closed condition requiring a means of mechanical ventilation.² A minimum of 25 dBA exterior to interior noise reduction is assumed with standard building construction.

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

IMPACT NOI-2: THE PROJECT WOULD NOT GENERATE EXCESSIVE GROUND-BORNE VIBRATION OR GROUNDBORNE NOISE LEVELS.

Construction

Less than Significant with Mitigation Incorporated. Construction activities would include demolition, excavation, and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

Demolition, excavation, and grading activities are required for implementation of the Project and can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec PPV at 25 feet.

At distances ranging from 12 to 201 feet from construction, vibration levels are anticipated to range from 0.0028 to 0.1900 in/sec PPV, as shown on Table 5.10-17. These vibration levels would not be sustained during the entire construction period but would occur only during the times that heavy construction equipment is operating in the vicinity of the sensitive receivers. This level of vibration would exceed the City of Covina's Municipal Code vibration standard of 0.01 in/sec RMS at receptor locations R4 and R5. Therefore, vibration impacts would be potentially significant and Mitigation Measure NOI-1 would be required.

Table 5.10-17: Unmitigated Construction Vibration Levels

Receiver	Distance to Const. Activity (Feet)	Receiver Levels (in/sec) RMS					Threshold (in/sec) RMS	Threshold Exceeded?
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration		
R1	201'	0.0001	0.0011	0.0024	0.0028	0.0028	0.01	No
R2	87'	0.0003	0.0038	0.0083	0.0097	0.0097	0.01	No
R3	130'	0.0002	0.0021	0.0046	0.0053	0.0053	0.01	No
R4	12'	0.0064	0.0747	0.1623	0.1900	0.1900	0.01	Yes
R5	15'	0.0046	0.0535	0.1161	0.1360	0.1360	0.01	Yes

Source: Urban Crossroads, 2020.

Mitigation Measure NOI-1 would implement a 90-foot buffer zone to restrict the use of large loaded trucks, heavy mobile equipment greater than 80,000 pounds, and jack hammers within 90-feet of occupied sensitive receptor locations R4 and R5. With implementation of the 90-foot buffer zone, construction vibration levels would be reduced to 0.009 in/sec RMS, as shown on Table 5.10-18, which would be less than the 0.01 in/sec RMS threshold. Therefore, impacts would be less than significant with mitigation.

Table 5.10-18: Mitigated Construction Vibration Levels

Receiver	Distance to Const. Activity (Feet)	Receiver Levels (in/sec) RMS					Threshold (in/sec) RMS	Threshold Exceeded?
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration		
R4	90	0.0003	0.0036	0.0079	0.0093	0.0093	0.01	No
R5	90	0.0003	0.0036	0.0079	0.0093	0.0093	0.01	No

Source: Urban Crossroads, 2020.

Operation

Less than Significant. Operation of the proposed commercial/office and multi-family uses would include heavy trucks for residents moving in and out of the residential units, product deliveries to retail and restaurant uses, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, typical vibration levels for the heavy truck activity at normal traffic speeds would be approximately 0.006 in/sec PPV, based on the FTA Transit Noise Impact and Vibration Assessment. Truck movements on site would be travelling at very low speed, so it is expected that truck vibration at nearby sensitive receivers would be less than the vibration threshold of 0.08 in/sec PPV for fragile historic buildings and 0.04 in/sec PPV for human annoyance, and therefore, would be less than significant.

5.10.7 CUMULATIVE IMPACTS

Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project site. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts.

Development of the proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise. However, Sections 9.40.090 and 9.40.110 require construction activities to not occur between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or anytime on Sunday or a federal holiday. Also, construction noise and vibration is localized in nature and decreases substantially with distance. Consequently, in order to achieve a substantial

cumulative increase in construction noise and vibration levels, more than one source emitting high levels of construction noise would need to be in close proximity to the proposed Project construction. As shown on Figure 5-1, there are no cumulative projects within hearing distance of the Project site. Thus, construction noise and vibration levels from the projects would not combine to become cumulatively considerable, and cumulative noise and vibration impacts associated with construction activities would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project in the opening year (2024) and the year 2040 cumulative traffic volumes on the roadways in the Project vicinity. The noise levels associated with these traffic volumes with the proposed Project were identified previously in Tables 5.10-12 and 5.10-13. As shown, cumulative development along with the proposed Project would increase local noise levels by a maximum of 0.2 dBA CNEL. As the increase is much lower than 1.5 dBA threshold, cumulative impacts associated with traffic noise would be less than significant.

5.10.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

- Section 9.40.110, Construction, of the City's Municipal Code does not allow construction activities to occur between the hours of 8:00 p.m. of any one day and 7:00 a.m. of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance.
- CalGreen Building Standards Code as included in the City's Municipal Code in Section 14.02.010(N).

5.10.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements Impact NOI-1 would be less than significant.

Without mitigation, Impact NOI-2 would be **potentially significant**.

5.13.10 MITIGATION MEASURES

Mitigation Measure NOI-1: Construction Vibration: Plans, specifications, and permits for construction within the Project site shall specify that loaded trucks and dozers (greater than 80,000 pounds) and jack hammers shall not be used within 90 feet of occupied residences located at 1119 W. Badillo Street (R4) and Covina Bonita Apartments at 1130 W. San Bernardino Road (R5) as shown in Draft EIR Figure 5.10-2: Noise Receptor Locations; and that small rubber-tired or alternative equipment shall be used within 90 feet of these occupied residences.

5.10.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The mitigation measure and existing regulatory programs described previously would reduce potential impacts associated with noise to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to noise would occur.

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5.11 Public Services

5.11.1 INTRODUCTION

This section describes the existing fire protection, police protection, and schools that serve the Project site and vicinity and evaluates the potential for implementation of the Project to result in an impact. This section of the EIR addresses whether there are physical environmental effects of new or expanded facilities that are necessary to maintain acceptable service levels related to fire, police, school services, and other public facilities. Because CEQA focuses on physical environmental effects, this section analyzes whether any physical changes resulting from an increase in service demands from development pursuant to the proposed Project could result in significant adverse environmental effects. Thus, an increase in staffing associated with public services, an increase in calls for services, would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs resulting from the Project could constitute a significant impact.

5.11.2 FIRE PROTECTION SERVICES

5.11.2.1 FIRE PROTECTION REGULATORY SETTING

California Fire Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in Title 24, Part 9 of the California Code of Regulations, the California Building Code), fire protection and notification systems, fire protection devices (such as extinguishers and smoke alarms), building evacuation and access standards, and fire suppression training.

California Health and Safety Code

Additional State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which includes regulations for building standards, fire protection and notification systems, fire protection devices such as extinguishers, smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Fighting Equipment,” California Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire house sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

City of Covina Municipal Code

Chapter 14.12; Fire Code. The Covina Municipal Code includes the California Fire Code as published by the California Building Standards Commission and the International Code Council (with some City-specific amendments). The California Fire Code is Title 24, Part 9 of the California Code of Regulations, and regulates new structures, alterations, additions, changes in use or changes in structures. The Code includes

specific information regarding safety provisions, emergency planning, fire-resistant construction, fire protection systems, means of egress and hazardous materials.

City of Covina General Plan

The Safety Element of the Covina General Plan includes the following policies related to fire protection services and the proposed Project.

Policy 3.b: Maintain all fire-inhibiting Building and Safety and Fire Department requirements and standards for new construction and for substantial additions to existing structures, including those for fire-resistant building materials; fire-resistant roofing components (untreated wood-shakes being prohibited); building construction; detector and alarm systems; fire service equipment; automatic fire sprinklers; one-hour fire walls; clearances around structures; accessibility to and into buildings; and the proper storage of flammable and combustible materials.

Policy 3.c: Maintain all fire-inhibiting Planning Department requirements and standards for new construction and for substantial additions to existing structures, including those for architectural design, site planning, building setback, landscape design, minimum road and driveway widths, and property usage and maintenance.

Policy 3.e: Maintain ongoing fire and business license inspection and business monitoring programs as well as code enforcement activities, particularly relating to establishments using or storing hazardous materials, to reduce fire dangers associated with commercial, industrial, and institutional buildings.

Policy 3.f: Maintain ongoing Neighborhood Preservation Program (NPP) and general code enforcement activities to reduce fire and other dangers in residential areas.

Policy 3.i: Consider to require fire-retardant plantings in conjunction with new construction and major expansions, if appropriate.

Policy 3.j: Continue to ensure the appropriate placement of fire hydrants and related infrastructure as well as water availability or the adequacy of fire flow pressure.

Policy 3.k: Maintain sufficient personnel, equipment, facilities, and resources in the Fire and Police Departments to handle fire incidents.

Policy 3.l: Maintain fire service-related mutual aid agreements with surrounding jurisdictions to supplement City personnel in fighting fires or in responding to small-scale hazardous materials incidents, when needed.

Policy 5.q. Continue to supply the Covina Fire Department with adequate personnel, equipment, resources, and facilities to perform its many duties, including responding to disasters, emergencies, and everyday public safety-related service requests, managing emergency preparedness planning, and conducting fire prevention activities, such that all Covina residents, workers, and others are afforded the highest quality, most efficient fire protection and paramedical service.

Policy 5.s: Maintain a sufficient ratio of sworn fire personnel to each 1,000 population and keep adequate civilian employees to support sworn staff.

Policy 5.t: Ensure continuing adequate fire and paramedical response times for all Covina properties.

Policy 5.ee: Ensure that the quality and scope of future fire, paramedical, and police protective resources and services keep pace with projected moderate growth and redevelopment and community revitalization activities.

Policy 5.jj: Maintain adequate water pressure flow capacity at all times and in all areas of Covina as well as ample, strategically placed fire hydrants to allow for proper firefighting capabilities.

5.11.2.2 FIRE PROTECTION SERVICE ENVIRONMENTAL SETTING

The City contracts with the Los Angeles County Fire Department (LACFD) to provide fire protection services and emergency response services. There are three fire stations within the City: Fire Station 152, located at 807 West Cypress Street; Fire Station 153, located at 1577 East Cypress Street; and Fire Station 154, located at 401 North 2nd Avenue.

Table 5.11-1: Fire Stations within the City of Covina

Fire Station	Location	Distance from Site	Estimated Response Time	Equipment	Staffing
Station 152	807 West Cypress Street	0.9 mile	3 minutes	1 Paramedic Engine	1 Fire Captain, 1 Fire Fighter Specialist, and 1 Fire Fighter
Station 153	1577 East Cypress Street	1.0 mile	3 minutes	1 combination ladder truck/pumper engine	1 fire captain, 1 fire fighter engineer, and 2 fire fighters
Station 154	401 North 2nd Avenue	1.5 miles	5 minutes	1 Paramedic Engine	1 Captain, 1 Fire Fighter Specialist and 1 Fire Fighter/Paramedic and a 2-person paramedic squad, staffed with 2 Fire Fighter/Paramedics.

Source: LACFD 2020

Fire Station 152, which is located approximately 0.9 mile to the north of the Project site, is the first responder to calls for service from the site. Station 152 is staffed daily with a three-person engine company consisting of one fire captain, one fire fighter engineer, and one fire fighter, and has an estimated response time of 3 minutes to the site.

Fire Station 154 is located 1.5 miles to the east of the Project site. Fire Station 154 has a three-person assessment engine staffed with one fire captain, one fire fighter engineer, and one fire fighter paramedic, and a paramedic squad staffed with two fire fighter paramedics and has an estimated response time of 5 minutes to the site. Daily on-duty staffing consists of 5 uniformed employees. Fire Station 154 also has a two-person paramedic squad staffed daily with two fire fighters/paramedics.

Fire Station 153 is located 1.0 mile from the site at 1577 East Cypress Street. However, Fire Station 153 would not be dispatched to the site unless there is a significant incident that would require regional resources (LACFD 2020). Currently, the Los Angeles County Fire Department does not have plans to expand facilities, staff, or equipment at Fire Stations 152, 153, or 154 (LACFD 2020).

5.11.2.3 FIRE PROTECTION SERVICE THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

5.11.2.4 FIRE PROTECTION SERVICE METHODOLOGY

The potential impacts related to fire protection services were evaluated based on the ability of existing fire department staffing, equipment, and facilities to meet the additional demand for fire protection and emergency medical services resulting from implementation of the proposed Project. Impacts are considered

significant if implementation of the proposed Project would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction or expansion of new or altered facilities that might have an adverse physical effect on the environment. For fire services, a significant impact could occur if the proposed Project generated the need for additional personnel or equipment that could not be accommodated within the existing stations and would require the construction of a new station or an expansion of an existing station.

5.11.2.5 FIRE PROTECTION SERVICE ENVIRONMENTAL IMPACTS

IMPACT PS-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED FIRE SERVICE FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS AND RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES FOR FIRE PROTECTION SERVICES.

Less than Significant. The proposed Project would result in development of 132 multi-family residences and 12,000 square feet of commercial/office uses in Planning Areas 1 and 2 in the short-term that would result in approximately 363 new residents and 26 additional employees¹. In addition, buildout of Planning Areas 3 and 4 by 2040 would result in development of 4,175 square-feet of retail space or 11 multi-family residential units in Planning Area 3 and 37,244 square feet of retail space or 52 multi-family residential units in Planning Area 4. If all of Planning Areas 3 and 4 were redeveloped with multi-family residences, approximately 173 residents would result by 2040. Conversely, if all of Planning Areas 3 and 4 were redeveloped with retail uses, approximately 87 employees would result by the year 2040.

Construction and operation of the commercial/office, retail, and multi-family residential development is expected to create the typical range of service calls that are largely related to medical emergencies and would incrementally increase demands for fire protection and emergency medical services over the existing site condition. However, the Project site is within 1.5 miles of three existing fire stations, 0.9 mile from the first responding fire station, and is within a developed area that is currently served. Therefore, the increase in needs for services from infill development on the site would be limited in comparison to the services currently provided by the existing fire stations. The existing fire stations would be able to meet the needs of the additional residents and employees that would result from implementation of the Project, and construction of a new fire station or an expansion of an existing fire station facility would not be required to meet the needs of the Project. Furthermore, in the event of simultaneous calls for service in the City, such that Fire Station 152 cannot meet the immediate needs of a call for service or does not have capability to address the full extent of a larger incident within the City, Fire Station 153 or 154 would respond or provide support. Thus, impacts related to fire services would be less than significant.

Additionally, development throughout the City, including the Project site, is subject to the California Fire Code (Part 9 of Title 24 of the California Code of Regulations), as is adopted in the City of Covina Municipal Code Section 14.12.010. The Fire Code includes requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access, and other fire and emergency access requirements. Compliance with these standards would be ensured through the plan check process prior to the issuance of building permits, which would further reduce potential impacts to fire services. Overall, impacts related to fire protection services would be less than significant.

¹ Based Upon the City's General Plan average number of persons per household of 2.745 and the U.S. Green Building Council's (2008) average SF/employee for commercial of 475 square feet.

5.11.2.6 FIRE PROTECTION SERVICE CUMULATIVE IMPACTS

The geographic context for cumulative fire protection and emergency services is the City of Covina. Staffing of the fire stations is done through contracting with LACFD. Thus, augmenting the existing fire station facilities, equipment, and staffing is under the jurisdiction of the City and evaluated on an annual basis during the City's budgeting process. The proposed Project would be reviewed by City and LACFD staff prior to permit approval to ensure that the new development implements fire protection design features per California building and fire code regulations that are included in the City's Municipal Code Section 14.12.010, which would reduce potential fire hazards.

As shown in Table 5-1 and Figure 5-1 there nine other identified development projects within Covina that would combine to generate additional demands for fire services. Seven of the nine other projects are similar multi-family and commercial developments that include 396 residential units; one is a transit center parking structure, and the other is an event center/office project. Based on the existing average persons per household of 2.75, the 396 residential units within cumulative projects would result in approximately 1,089 residents, which would require an incremental increase in the need for fire protection services. Consistent with the proposed Project, these related projects involve redevelopment of existing lands and the projects would be reviewed by City and LAFD staff prior to permit approval to ensure that the projects implement fire code requirements, which would reduce potential fire hazards.

Because three existing fire stations are located within 1.5 miles of the Project site, and related projects would be subject to the same California Fire Code and City Municipal Code fire protection requirements, impacts related to fire services from the proposed Project would not combine with other related projects to result in a cumulative impact related to the need for new or physically altered fire service facilities. Therefore, cumulative impacts associated with fire services would be less than cumulatively considerable.

5.11.2.7 FIRE PROTECTION SERVICE EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

The following standard regulation would reduce potential impacts related to fire protection services:

- Covina Municipal Code Chapter 14.12; Fire Code

5.11.2.8 FIRE PROTECTION SERVICE LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-1 would be less than significant

5.11.2.9 FIRE PROTECTION SERVICE MITIGATION MEASURES

No mitigation measures are required.

5.11.2.10 FIRE PROTECTION SERVICE LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to fire protection services would occur.

5.11.3 POLICE SERVICES

5.11.3.1 POLICE SERVICES REGULATORY SETTING

City of Covina General Plan

The Safety Element of the Covina General Plan includes the following policies are related to police services and the proposed Project.

Policy 5.w: Continue to supply the Covina Police Department with adequate personnel, equipment, resources, and facilities to perform its many duties, including responding to disasters, emergencies, and every day public safety-related service requests, managing the City's emergency communications systems, and conducting crime prevention programs, such that all Covina residents, workers, and others are afforded the highest quality, most efficient law enforcement.

Policy 5.x. Constantly monitor and evaluate operations and procedures relative to law enforcement to identify where improvements can be made.

Policy 5.y. Maintain a sufficient ratio of sworn police officers for each 1,000 population and keep adequate civilian employees to support sworn staff.

Policy 5.z. Ensure continuing adequate police response times for all Covina properties.

Policy 5.aa. Attempt to reduce crime to persons and property by alleviating the underlying causes of and opportunities for offenses through physical design, City programs, and community development and neighborhood preservation activities.

Policy 5.dd. Where appropriate, apply standards for defensible space in reviewing new and expanded developments to best promote personal security. (Defensible space refers to planning and design techniques that can be used to discourage crime. The concept was developed by Oscar Newman in his book "Defensible Space: Crime Prevention Through Urban Design.")

Policy 5.ee. Ensure that the quality and scope of future fire, paramedical, and police protective resources and services keep pace with projected moderate growth and redevelopment and community revitalization activities.

Policy 5.ff. Require that new, expanded, or altered potentially problematic or public safety-threatening developments, uses, and businesses mitigate any impacts on services that may result from the proposals through measures acceptable to the City.

Policy 5.gg. Maintain fire-, paramedical-, and law enforcement-related mutual aid agreements with surrounding communities and with Los Angeles County to provide supplemental emergency service assistance, if necessary.

5.11.3.2 POLICE SERVICES ENVIRONMENTAL SETTING

The Covina Police Department provides police services throughout the City. The Police Department headquarters is located approximately 1.28 miles east of the Project site at 444 N Citrus Avenue.

The Covina Police Department has 101 personnel, which includes 59 sworn (1 Chief, 2 Captains, 4 Lieutenants, 9 Sergeants, and 43 Police Officers) and 42 non-sworn positions. Based on the California Department of Finance estimate that 48,683 residents lived within the City in 2019, the City's sworn officer to population ratio is 0.83 officers per 1,000 population.

In 2019, officers responded to 35,867 calls for service and incidents of proactive enforcement activity and had the following response times per service call priority:

- Priority One – 4 minutes and 28 seconds
- Priority Two – 12 minutes
- Priority Three – 16 minutes

5.11.3.3 POLICE SERVICES THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered police department facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services. Priority One calls include robbery, assault with a deadly weapon, traffic collisions with injuries, etc.

5.11.3.4 POLICE SERVICES METHODOLOGY

The potential impacts related to police services were evaluated based on the ability of existing and planned police department staffing, equipment, and facilities to meet the additional demand for police services resulting from implementation of the proposed Project. Impacts are considered significant if implementation of the proposed Project would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction or expansion of new or altered facilities that might have an adverse physical effect on the environment. For police services, a significant impact could occur if the proposed Project generated the need for additional personnel or equipment that could not be accommodated within the existing station and substations and would require the construction of a new station or an expansion of an existing station.

5.11.3.5 POLICE SERVICES ENVIRONMENTAL IMPACTS

IMPACT PS-2 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED POLICE SERVICE FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS AND RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES FOR POLICE SERVICES.

Less than Significant. The proposed Project would result in new residents, additional employees, and valuables onsite that would result in the need for an incremental increase in police services. During the construction and operation of the Project, the need for police services may increase due to: theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. During operation, the proposed Project is anticipated to generate a typical range of police service calls, such as vehicle burglaries, residential thefts, commercial shoplifting, and disturbances. The proposed Project addresses typical residential security concerns by providing low-intensity security lighting. Pursuant to the City's existing permitting process, the Police Department would review and approve the development site plans to ensure that public safety measures are incorporated appropriately to provide a safe environment.

The proposed Project would result in an incremental increase in demands on law enforcement services but would not be significant when compared to the current demand levels. As described previously, the population of the proposed 132 residences at full occupancy would be approximately 363 residents and based on the Police Department's 2019 staffing of 0.83 officers per thousand population, the proposed development would require 0.3 additional officer. The need for 0.3 additional officer would not result in the need to expand existing or build new police facilities.

Similarly, buildout of Planning Areas 3 and 4 by the year 2040 could result in approximately 173 residents. Based on the Police Department's 2019 staffing of 0.83 officers per thousand population, the additional 173 residents would require 0.1 additional officer. Therefore, buildout of all of the Planning Areas would result in a need for 0.4 additional officer by 2040, which would not result in the need to expand existing or build new police facilities. As such, the proposed Project would not result in substantial adverse physical

impacts associated with the provision of new or physically altered police facilities. Thus, impacts resulting from the proposed Project would be less than significant.

5.11.3.6 POLICE SERVICES CUMULATIVE IMPACTS

The geographic context for cumulative police services is the City of Covina. As described above, the Project would result in a limited incremental increase in demands on law enforcement services. In addition, the Project would provide security lighting and would be reviewed by the Police Department to provide for incorporation of security design features, which would lessen the demand for police protection services.

Table 5-1 lists seven projects that include 396 multi-family residential units and approximately 83,000 square feet of commercial, office, and event center uses. Based on the existing average persons per household of 2.75, the 396 residential units within cumulative projects would result in approximately 1,089 residents, which would require one additional officer to maintain the City's existing officers to population ratio. The addition of 0.4 officer from the proposed Project and one officer from the cumulative projects would not result in the need for, new or physically altered police protection facilities. The new officers would be added to the Police Department staffing and would likely be in the field and on patrol. Therefore, the law enforcement service-related impacts from the proposed Project would not combine with the cumulative projects to result in a cumulatively considerable impact. Cumulative impacts associated with police services would be less than significant.

5.11.3.7 POLICE SERVICES EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

There are no applicable regulations related to police services that would reduce potential impacts.

5.11.3.8 POLICE SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-2 would be less than significant.

5.11.3.9 POLICE SERVICES MITIGATION MEASURES

No mitigation measures are required.

5.11.3.10 POLICE SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to police services would occur.

5.11.4 SCHOOL SERVICES

5.11.4.1 SCHOOL SERVICES REGULATORY SETTING

California State Assembly Bill 2926: School Facilities Act of 1986

In 1986, AB 2926 was enacted to authorize the levy of statutory fees on new residential and commercial/office development in order to pay for school facilities. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of statutory fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50

The passage of SB 50 in 1998 defined the needs analysis process that is codified in Government Code Sections 65995.5 through 65998. Under the provisions of SB 50, school districts may collect fees to offset

the costs associated with increasing school capacity as a result of development. Level I fees are assessed based upon the proposed square footage of residential, commercial/office, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the other half. Level III fees require the developer to pay the full cost of accommodating the students in new schools and are implemented at the time the funds available from Proposition 1A (approved by the voters in 1998) are expended. School districts must demonstrate to the state their long-term facilities needs and costs based on long-term population growth in order to qualify for this source of funding.

Government Code Section 65996

Section 65996 designates Section 17620 of the Education Code (the mitigation fees authorized by SB 50) and Section 65970 of the Government Code to be the exclusive method for considering and mitigating development impacts on school facilities.

5.11.4.2 SCHOOL SERVICES ENVIRONMENTAL SETTING

The Project site is located within the Covina Valley Unified School District (CVUSD) boundary, which serves the communities of Covina, West Covina, Glendora, San Dimas, and Irwindale and has a total of 18 schools, including: nine elementary schools, three middle schools, and four high schools, one children's center, and one nonpublic, nonsectarian school (CDE 2019).

Covina Valley Unified School District's school facilities had an enrollment of 11,713 students in the 2018/2019 school year (CDE 2019). The Project site is in the attendance areas of Grovecenter Elementary School (775 N. Lark Ellen Avenue, West Covina), which is approximately 0.5 miles from the site; Las Palmas Middle School (641 N. Lark Ellen Avenue, Covina), which is approximately 0.6 miles from the site; and Northview High School (1016 W. Cypress Street, Covina), which is approximately 1.4 miles from the site (CVUSD 2020).

As shown on Table 5.11-2, the enrollment for these schools in ranged by 110 students in the elementary school, 121 students in the middle school, and 141 students in the high school between the 2019-2020 and the 2013-2014 school years.

Table 5.11-2: School Enrollment Between 2019-20 and 2013-14

School	2019-20	2018-19	2017-18	2016-17	2015-16	2014-15	2013-14
Grovecenter Elementary School	555	589	577	499	479	489	500
Las Palmas Middle School	805	860	900	878	844	870	926
Northview High School	1,265	1,247	1,274	1,314	1,333	1,346	1,388

Source: California Department of Education.

5.11.4.3 SCHOOL SERVICES THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain provision of acceptable school services.

5.11.4.4 SCHOOL SERVICES METHODOLOGY

The potential impacts related to school services were evaluated based on the ability of existing and planned schools to accommodate the student population that would be generated by the proposed Project. Specifically, impacts on schools are determined by analyzing the estimated increase in student population as a result of Project buildout and comparing the increase to the capacity of schools that would serve the Project site to determine whether new or altered facilities would be required, the construction of which could result in adverse environmental effects.

5.11.4.5 SCHOOL SERVICE ENVIRONMENTAL IMPACTS

IMPACT PS-3 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

Less than Significant. The proposed Project would develop 132 multi-family residences, which would provide housing for families that have school children. The Covina Valley Unified School District uses the State's Student Yield Factor for Unified School Districts, which is 0.7 students per dwelling unit (Office of Public School Construction 2009). Using this factor, the proposed 132 multi-family residences could result in approximately 92 new students that would range in age from elementary through high school. Also, buildout of Planning Areas 3 and 4 by the year 2040 could result in 11 multi-family residential units in Planning Area 3 and 52 multi-family residential units in Planning Area 4, which would result in an additional 44 students.

While development of the new residential units would increase the number of students, this increase would be accommodated by the existing schools. As described previously, the enrollment for the schools serving the Project site in ranged by 110 students in the elementary school, 121 students in the middle school, and 141 students in the high school between the 2019-2020 and the 2013-2014 school years (CDE 2020). Thus, the 136 new students generated from buildout of the Project site that would range in age from kindergarten to high school students would be accommodated by existing school facilities.

In addition, as described within the Regulatory Setting, the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for commercial, office, and residential projects. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would be less than significant with the Government Code required fee payments.

5.11.4.6 SCHOOL SERVICES CUMULATIVE IMPACTS

The geographic context for cumulative impacts to schools is the Covina Valley Unified School District boundaries. The Project and other development within the Covina Valley Unified School District could generate additional students resulting in the need to expand or construct new schools. As described above, buildout of the Project site would generate approximately 136 additional students. These additional students would be accommodated by the existing schools with additional capacity available for cumulative projects.

As described previously, Table 5-1 lists seven projects that include 396 multi-family residential units. Based on the 0.7 students per dwelling unit generation rate, the 396 residential units within cumulative projects

would result in approximately 277 students that would range from elementary school through high school. However, the attendance boundary of Grovecenter Elementary School does not include these cumulative projects. Thus, a cumulative increase of attendance at Grovecenter Elementary School would not occur from the proposed Project. Also, only one project (Project C4 listed on Table 5-1 and Figure 5-1) that includes 117 residential units is included in the Las Palmas Middle School and Northview High School attendance boundaries. The additional 117 residential units from this cumulative project would result in approximately 82 students, a portion of which would be middle school and high school students. As described previously, the enrollment for the middle and high schools serving the Project site in ranged by 121 students in the middle school and 141 students in the high school between the 2019-2020 and the 2013-2014 school years (CDE 2020). Thus, the new students generated by the cumulative projects would also be accommodated by the existing school facilities and cumulative impacts related to school services would be less than significant.

Additionally, as described above, the state provided authority for school districts to assess impact fees for both residential and non-residential development projects. Fees collected in accordance with Government Code Section 65995(b) allows the Covina Valley Unified School District to plan and construct for future growth. Furthermore, the payment of those fees constitutes full mitigation for the impacts generated by new development, per Government Code Section 65995, which would further reduce potential impacts related to the projects cumulative school service impacts to a less than significant level.

5.11.4.7 SCHOOL SERVICES EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

- Government Code Section 65995(b)

5.11.4.8 SCHOOL SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-3 would be less than significant.

5.11.4.9 SCHOOL SERVICES MITIGATION MEASURES

No mitigation measures are required.

5.11.4.10 SCHOOL SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to school services would occur.

5.11.5 OTHER SERVICES

5.11.5.2 OTHER SERVICES ENVIRONMENTAL SETTING

Library services are provided by the Covina Public Library located at 234 North Second Avenue, Covina, CA 91723. The library supports a variety of resources, including computers and wireless internet access; journal articles, magazines, and newspapers; literacy programs; homework help programs; and computer tutoring sessions. The library also supports a community room that can be rented by non-profit and commercial groups (City of Covina 2018).

5.11.5.3 OTHER SERVICES THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, the construction of which could cause significant environmental impacts, or other performance objectives for other services.

5.11.5.4 OTHER SERVICES METHODOLOGY

The potential impacts related to other public services were evaluated based on the ability of existing and planned libraries to accommodate the additional population that would be generated by the proposed Project. Specifically, impacts on library services are determined by analyzing the estimated increase in the additional population as a result of Project buildout and comparing the increase to the other public facilities that would serve the Project site to determine whether new or altered facilities would be required, the construction of which could result in adverse environmental effects.

5.11.5.5 OTHER SERVICES ENVIRONMENTAL IMPACTS

IMPACT PS-4 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED OTHER PUBLIC FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

Less than Significant. Other public facilities and services provided within the City include library services. Library services are provided by the Covina Public Library, located at 234 North Second Avenue. The proposed development in Planning Areas 1 and 2 would develop 132 multi-family residences, which would generate approximately 363 residents, who in addition to employees of the proposed 12,000 square feet of commercial/office space could use the City's library services. Similarly, buildout of Planning Areas 3 and 4 by the year 2040 could result in approximately 173 residents that could use library services.

However, library service needs are changing with increasing resources being available online and the availability of high speed internet services. Therefore, the additional people on the site does not necessarily have an incremental increased need for library resources/services or square footage of library space. A majority of the proposed residential units would be equipped with internet access, which provides access to many of the same resources provided by the library and would limit the increased need for library services and resources. Thus, any increase in library use from the proposed Project would not be significant relative to citywide demand, and it is anticipated that existing library would accommodate implementation of the proposed Project. As such, impacts to other public facilities would be less than significant.

5.11.5.6 OTHER SERVICES CUMULATIVE IMPACTS

Table 5-1 lists seven projects that include 396 multi-family residential units and approximately 83,000 square feet of commercial, office, and event center uses. Based on the existing average persons per household of 2.75, the 396 residential units within cumulative projects would result in approximately 1,089 residents that could use library services. However, as described previously, library service needs are changing with increasing resources being available online and the availability of high speed internet services. Thus, it is anticipated that existing library services would accommodate the additional population that would occur from the proposed Project in combination with the cumulative projects, and construction of a new library or expansion of the existing library would not be necessitated by the cumulative development. Therefore, cumulative impacts related to library services would be less than significant.

5.11.5.7 OTHER SERVICES EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

There are no applicable regulations related to other services that would reduce potential impacts.

5.11.5.8 OTHER SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-4 would be less than significant.

5.11.5.9 OTHER SERVICES MITIGATION MEASURES

No mitigation measures are required.

5.11.5.10 OTHER SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to other services would occur.

REFERENCES

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5.12 Parks and Recreation

5.12.1 INTRODUCTION

Pursuant to the requirements of CEQA, this section of the EIR analyzes whether the proposed Project would (1) increase the use of existing parks and recreational facilities such that substantial physical deterioration or degradation of the facilities would occur or be accelerated or that new or expanded facilities would be required; (2) result in substantial adverse construction-related effects associated with the provision of new or physically altered parks and recreational facilities, whether on site or off-site; and/or (3) adversely affect existing recreational facilities.

New housing can result in the need for additional park and recreation facilities. Because CEQA focuses on physical environmental effects, this section analyzes whether any physical changes resulting from an increase in demands for park and recreation facilities from the proposed Project could result in significant adverse environmental effects. Thus, an increase in use of parks would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs related to substantial physical deterioration could constitute a significant impact. The proposed Project has also been evaluated to determine its consistency with the City's zoning code provisions related to the provision of park and recreation facilities.

5.12.1 REGULATORY SETTING

Quimby Act

California Government Code Section 66477, referred to as the Quimby Act, permits local jurisdictions to require the dedication of land and/or the payment of in-lieu fees solely for park and recreation purposes. The required dedication and/or fees are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds.

City of Covina Municipal Code

Municipal Code, Section 16.28.030 requires that as a condition of approval of a tentative or final tract map or parcel map for a residential subdivision, or for a building permit within a subdivision, the subdivider shall be required to pay an impact fee, offer for dedication parkland in lieu thereof or both, for park and recreational purposes.

Municipal Code, Section 16.28.040 requires three acres of parkland for every 1,000 persons residing within the city, and states that to determine the number of persons for parkland purposes, the dwelling unit occupancy factors shall be as follows: 3.02 for owner-occupied dwelling units and 2.72 for rental dwelling units. The maximum amount of parkland required for any subdivision shall be determined by multiplying the number of dwelling units in the subdivision for each housing type by the occupancy factor for each housing type by 0.003 (i.e., the ratio of the maximum park area standard of three acres per 1,000 population). This is represented as follows: $(\text{No. of dwelling units}) \times (\text{occupancy factor}) \times (.003) = \text{Area of park to be dedicated}$. In addition, Municipal Code Section 16.28.050 states that the project can pay a fee in lieu of the parkland dedication.

City of Covina General Plan

The Natural Resources and Open Space Element of the Covina General Plan includes the following park and recreation policies that are related to the proposed Project:

Policy 1.g: Encourage optimum usage of available green space and recreational facilities.

Policy 1.h: Endeavor to provide for its citizens a total park acreage equal to 2.0 acres for every 1,000 population at the time of General Plan buildout.

Policy 1.v: Provide active and passive park and recreational facilities and programs to serve the needs of as many population segments as possible.

5.12.2 ENVIRONMENTAL SETTING

The Open Space, Parks, and Recreation Element of the Covina General Plan states that the City has approximately 63.5-acres of accessible parkland/open space across seven parks, one plaza, and two ball fields. Based on the 2019 population estimate of 48,683 residents, the City has approximately 1.30 acres of public park and/or recreational space per every 1,000 residents. The existing parks, plaza, and ball fields within the City of Covina are listed in Table 5.12-1.

Table 5.12-1: City of Covina Existing Recreation Facilities

Park Facility	Amenities	Acreage	Miles from Project Site
Savoy Field 1359 East Cypress Street	Ball field(s).	5.0 acres	1.1 miles
Covina Park 303 North Fourth Avenue	Bandshell, baseball field(s), basketball courts, community room, horseshoe pit, jogging track, picnic tables, picnic shelter, playground, recreational hall, softball field(s), swimming pools, and tennis courts.	10.0 acres	1.2 miles
Heritage Plaza Park 400 North Citrus Avenue	Playground, performance platforms, picnic tables.	1.5 acres	1.3 miles
Edna Park 220 West Edna Place	Picnic tables and playground.	2.5 acres	1.4 miles
Cougar Park 150 W. Puente Street	Community center, community garden, playground, picnic tables, and splash pad.	1.0 acre	1.6 miles
Xalapa Park 1321 East Garvey Avenue North	Picnic tables, and playground.	2.5 acres	1.6 miles
Hollenbeck Park 1250 North Hollenbeck Avenue	Baseball field(s), basketball courts, football field, picnic tables, playground, scout houses, soccer field, and softball field(s)	10.0 acres	1.7 miles
Kelby Park 815 North Barranca Avenue	Community room, Joslyn Center, picnic tables, playground, scout houses, and soccer field.	7.0 acres	2.1 miles
Kahler Russell Park (aka Wingate Park) 735 North Glendora Avenue	Baseball field(s), basketball courts, football field, picnic tables, picnic shelter, playground, hockey, tennis, soccer field, softball field(s), and nature trails.	17.0 acres	2.4 miles
Heyler Field 303 South Glendora Avenue	Ball field(s).	5.0 acres	3.0 miles

Park Facility	Amenities	Acreage	Miles from Project Site
Banna Park Cypress Street and Banna Avenue	Dog Park and Tot Lot	2.0 acres	3.5
Total Acreage of Parkland		63.5 acres	

Source: City of Covina 2000.

In addition to the City parks and ball fields described above, the Covina-Valley and Charter Oak School Districts and large private schools manage several campuses in and around the City that provide supplemental green space and recreational facilities, such as gymnasiums, to City residents subject to the allowable hours by the schools. Additionally, there are several County recreational facilities located near the City that are often used by City residents. The closest of these facilities is Charter Oak Park, located at 20261 East Covina Boulevard in an unincorporated neighborhood. Charter Oak Park is a 19-acre open space land providing generally similar amenities to those found in City parks, such as ball fields, basketball courts, and playgrounds (City of Covina 2000). Charter Oak Park is located approximately 3.7 miles east of the Project site.

5.12.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in:

- Substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives;
- 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; or
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

5.12.4 METHODOLOGY

The analysis below considers the increase in use of parks and recreation facilities that would be generated by the Project in relation to the ability of existing park and recreation facilities to accommodate the increased use. The analysis considers whether an increase in use would result in the substantial physical deterioration of existing recreational facilities, such as accelerated wear on sports facilities and fields, or in the need for new or expanded facilities.

The analysis uses a parkland-to-population ratio to measure demand for recreational facilities that is based upon the City's municipal code requirements. A shortfall in meeting the requirements for provision of park or recreation facilities from the proposed Project would be presumed to increase use of existing parks and recreational facilities and cause deterioration of these existing facilities. The EIR thus evaluates the amount of recreational use areas that would be provided by the proposed Project and the extent of increased usage of existing parks and recreational facilities that might result in the substantial physical deterioration of existing recreational facilities. In addition, the analysis of construction impacts associated with the development of proposed recreational facilities are considered as part of the overall Project.

5.12.5 ENVIRONMENTAL IMPACTS

IMPACT PR-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED PARK FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

Less than Significant. The proposed Project would result in development of 132 multi-family residential units within Planning Area 2 that would increase demands for park and recreational facilities. According to the General Plan population estimate, the average number of persons per household in the City of Covina is 2.745. Using the 2.745 person per unit multiplier, the new units would result in an estimated increase in population of approximately 363 residents. However, as described in Section 3.0, *Project Description*, and shown in Figure 3-4, the proposed Project includes 5,024 square feet of open space and recreation area for residents. These onsite amenities would help to meet the park and recreation needs of site residents.

The new residential population is also anticipated to utilize existing off-site park and recreation facilities. As described listed in Table 5.12-1, there is currently 63.5 acres of parkland area within the City of Covina. Of this, 61.5 acres is within three miles from the Project site. These existing City of Covina parks provide a variety of facilities that include sports fields, exercise equipment, picnic areas, and playgrounds.

Based on the City's Municipal Code requirement of three acres of parkland per 1,000 residents and the Municipal Code occupancy factor for park requirements of 3.02 persons per owner-occupied dwelling unit, the proposed 132 owner occupied residences would require 1.2 acres (52,272 square feet) of parkland. Of this, 5,024 would be provided onsite, and the City's Municipal Code Section 16.28.050 requires in-lieu fees be paid for the remaining 47,247 square feet of parkland needed for Planning Area 2 that is not provided onsite.

In addition, buildout of Planning Areas 3 and 4 by the year 2040 could result in development of 63 multi-family residential units that would house approximately 173 residents. These additional units would require 0.57 acre (24,829 square feet) of additional parkland. As no specific development is proposed for Planning Areas 3 and 4 it is unknown if or what portion of the required parkland would be provided onsite. However, consistent with the City's Municipal Code Section 16.28.050 requires in-lieu fees be paid for the parkland not provided onsite.

Also, based on the 61.5 acres of existing park and recreation facilities within 3 miles of the Project site, the recreation facilities that would be provided as part of Planning Area 2, and the limited number of new residents (536) that would occur from buildout of the Project site, implementation of the Project is not anticipated to require the provision of new or physically altered park facilities in order to maintain acceptable service ratios. Therefore, impacts would be less than significant.

Furthermore, the City's Municipal Code Section 16.28.050 requires in-lieu fees to provide for an appropriate balance between the demand by residents, and the provision of park and recreational facilities. Overall, impacts related to park and recreation service facilities would be less than significant.

IMPACT PR-2: THE PROJECT WOULD NOT INCREASE OF 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. As described previously in the discussion for Impact PR-1, the Project would provide onsite open space and recreation facilities for residents that is anticipated to reduce the demands on existing off-site recreation facilities. In addition, approximately 63.5 acres of parkland are within the City of Covina, 61.5 acres of which is within three miles of the Project site.

Anticipated visitation increases to the existing parks were estimated based on the California State Parks Survey on Public Opinions and Attitudes on Outdoor Recreation in California (2014, which identifies that 16.7 percent of residents visit parks two or more times per week, 13.8 percent visit parks about once a week, 20.6 percent visit once or twice per month, 24.4 percent visit several times a year, and 15.1 percent visit once or twice a year.

The facility users in southern California spent an average of approximately 30 minutes per visit. The adult park and recreation users generally engage in the following activities: walking on paved surfaces: 49.8%, playing: 27.9%, picnicking: 22.0%, sedentary activities: 17.6%, sports: 21.4%, running: 15.6%, and dog walking: 10.8 percent. The park and recreation users under 18 years old generally engage in the following activities: playing: 57.8%, sports 33.1%, other 21.6%, walking on paved surfaces: 16.4%, picnicking: 14.3%, jogging: 14.5%.

Based on the California State Parks information for the southern California Region, the anticipated number of residents at full potential occupancy of all Planning Areas (536 residents), it is anticipated that the proposed residences would generate 90 additional park users two or more times per week, 74 additional park users about once per week, 110 additional park users once or twice per month, 86 additional park users several times a year, and 81 additional park users once or twice a year that would utilize the 63.5 acres of parkland within the City. This level of additional use is not anticipated to result in substantial physical deterioration of the existing facilities. Thus, impacts would be less than significant.

In addition, the City's Municipal Code Section 16.28.050 requires in-lieu fees for the parkland that is not provided with the Project site. Thus, the proposed Project would be required to pay park and recreation fees to offset the increased use of existing park and recreational facilities, which would further reduce potential impacts. Overall, the proposed Project would not result in substantial physical deterioration of park and recreation facilities, and impacts would be less than significant.

IMPACT PR-3: THE PROJECT WOULD NOT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT.

Less than Significant. As described previously, the Project includes approximately 5,026 square feet of common open space and recreational area, which includes a 1,692 square foot area with: a playground, fitness park area with exercise equipment, outdoor dining BBQ area; and a 3,334 square foot lawn bowl area inspired by the historical use and architecture of the Covina Bowl building. The impacts of development of these recreational amenities are considered part of the impacts of the proposed Project as a whole and are analyzed throughout the various sections of this EIR. For example, activities such as excavation, grading, and construction as required for the park and recreational components of this Project are analyzed in the Air Quality, Greenhouse Gas Emissions, Noise, and Transportation Sections.

In addition, while the Project would contribute park development in-lieu fees pursuant to Municipal Code Section 16.28.030 to be used towards the future expansion or maintenance parks and recreational facilities, these fees are standard with every residential development, and the proposed Project would not require the construction or expansion of other recreational facilities that might have an adverse physical effect on the environment. As a result, impacts would be less than significant.

5.12.6 CUMULATIVE IMPACTS

The cumulative area of recreation impacts for the proposed Project includes the City of Covina, as this is the area served by the City. As described previously, there are 63.5 acres of existing parkland within the City. As described previously, the proposed Project includes development of 132 new residences in Planning Area

2 that would result in 363 new residents and approximately 5,026 square feet of common open space and recreational area, and would be required to provide in-lieu fees pursuant to the Municipal Code. In addition, buildout of Planning Areas 3 and 4 by the year 2040 could result in development of 63 multi-family residential units that would house approximately 173 residents, which would require 0.57 acre (24,829 square feet) of additional parkland. Consistent with the City's Municipal Code Section 16.28.050, in-lieu fees would be required for the parkland requirements not provided onsite.

The cumulative projects listed in Table 5-1 include seven projects that would develop 396 multi-family residential units and approximately 83,000 square feet of commercial, office, and event center uses. Based on the existing average persons per household of 2.75, the 396 residential units within cumulative projects would result in approximately 1,089 residents that could use existing park and recreation facilities.

Although new Project site residents would also likely use of off-site park facilities, such as the other parks listed in Table 5.12-1, along with the residents of the cumulative projects, these projects would also be required to provide park and recreational facilities and/or pay in-lieu fees, which are implemented to preserve an appropriate balance between the demand by residents for use of park and recreational facilities, and as a result reduce cumulative effects of each project. Thus, because the proposed Project would provide open space and recreation facilities and payment of the required park fees, the Project's impact would not be cumulatively considerable, and cumulative impacts related to park and recreation facilities would be less than significant.

5.12.7 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

The following standard regulations would reduce potential impacts related to park and recreation services:

- California Code Sections 66000 (Mitigation Fee Act)
- Covina Municipal Code Section 16.28.030
- Covina Municipal Code Section 16.28.040

5.12.8 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impacts PR-1 through PR-3 would be less than significant.

5.12.9 MITIGATION MEASURES

No mitigation measures are required.

5.12.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to parks and recreation would occur.

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5.13 Transportation

5.13.1 INTRODUCTION

This section describes the existing transportation and circulation conditions, criteria for the level of service, and impacts from implementation of the proposed Project. As necessary, mitigation measures for significant transportation impacts resulting from the construction and operation of the proposed Project are also included. The proposed Project's impacts are analyzed in the context of existing (2020), Project opening year (2024), and future (2040) conditions. This section includes data from the Transportation Impact Study (TIS 2020) and Supplemental VMT Analysis (VMT 2020), prepared by Linscott, Law & Greenspan (LL&G), included as Appendix L.

Traffic Analysis Terminology

Level of Service (LOS): is a measure of the quality of operational conditions within a traffic stream and is generally expressed in terms of such measures as speed and travel time, freedom to maneuver, traffic interruptions, comfort and convenience. Levels range from A to F, with LOS A representing excellent (free-flow) conditions and LOS F representing extreme congestion.

Peak Hour: The a.m. peak hour is defined as the one hour of highest traffic volumes occurring between 7:00 a.m. and 9:00 a.m. The p.m. peak hour is defined as the one hour of highest traffic volumes occurring between 4:00 and 6:00 p.m.

Volume/Capacity (V/C) Ratio: is one of the most used index to assess traffic status in cities, in which V is the total number of vehicles passing a point in one hour and C for the maximum number of cars that can pass a certain point at the reasonable traffic condition

5.13.2 REGULATORY SETTING

Senate Bill 743 and CEQA Guidelines Section 15064.3

On September 27, 2013, Senate Bill (SB) 743 was signed into State law. The California legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32).

The SB 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099[b][1]); and that “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment” (Public Resources Code Section 21099[b][2]).

In response, the 2019 CEQA Guidelines include a new section (15064.3) that specifies that VMT is the most appropriate measure of transportation impacts. Also, a Technical Advisory issued by the Governor's Office of Planning and Research (OPR) in December 2018 provides additional technical details on calculating VMT and assessing transportation impacts for various types of projects. The revised CEQA Guidelines related to VMT took effect July 1, 2020.

Congestion Management Program

In 1990, the California Legislature enacted the Congestion Management Program (CMP) to implement Proposition 111, a state-wide transportation funding proposal that required local governments to implement mitigation measures to offset the impacts from new development on the regional transportation system. The CMP primarily utilized a level of service (LOS) performance metric.

Senate Bill 743 contains amendments to current congestion management law that allows counties to opt out of the LOS standards that would otherwise apply in areas where CMPs are utilized. Pursuant to California

Government Code §65088.3, local jurisdictions may opt out of the CMP requirement without penalty if a majority of the local jurisdictions representing a majority of the County's population formally adopt resolutions requesting to opt out of the program. As of October 2019, the majority of local agencies representing the majority of the County's population have adopted resolutions to opt out of the program. Therefore, the CMP is no longer applicable in Los Angeles County.

SCAG 2016 - 2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016 SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and the goals and policies relevant to the proposed project are listed below:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.
3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.
5. Maximize the productivity of our transportation system.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and active transportation.

City of Covina General Plan

Circulation Element

The Circulation Element of the Covina General Plan serves as the City's primary guide for transportation planning. The following goals and policies in the existing General Plan Circulation Element are relevant to the proposed Project:

Policy Area 1: Maintenance and improvement of public rights-of-way and related infrastructure to accommodate future growth.

8. In conjunction with major development proposals or other situations on the most congested streets, consider to require the detailed analysis of specific intersections at peak hours as a means of clarifying the operations of and better identifying acceptable or sufficient mitigation for particular roadway segments.
26. Ensure that all new and modified public streets and appurtenant components thereof and other infrastructure are designed in accordance with all applicable City standards, except where

community goals, objectives, and policies are best furthered, and are designed so as to minimize construction and maintenance costs.

Policy Area 5: General circulation and infrastructure matters.

1. For major developments, continue requiring builders/developers to incorporate various traffic congestion mitigation/reduction and additional infrastructure-related amenities and features into their projects, in accordance with the Covina Municipal Code and any other City or Redevelopment Agency provisions.
2. Follow, in a reasonable manner, through the Covina Site Plan Review and other processes, applicable portions of all Federal, State, regional, and County transportation plans/provisions, such as the Los Angeles County Congestion Management Program (CMP), that mandate traffic congestion mitigation and air pollution reduction measures be imposed on major private developments by, among other strategies, minimizing single-occupant trips, advancing alternative modes of transportation, and/or alleviating traffic-related impacts by requiring the incorporation of appropriate facilities into site design and the performing of necessary traffic impact analyses.
5. Balance the City's obligation to address certain traffic-, circulation-, and general infrastructure-related deficiencies with Covina's need to accommodate residential and nonresidential growth or to continue with ongoing communitywide economic development, commercial revitalization, neighborhood preservation, and affordable housing activities/programs.
7. Continue to require adequate on-site parking and vehicular circulation in the plan approval process through standards and provisions in the Zoning Ordinance, Design Guidelines, and other documents.
10. On a citywide basis, continue, where appropriate, accommodating vibrant, quality, and attractive commercial and industrial businesses that strengthen the City's economic base, image, and character while minimizing adverse traffic impacts.
13. Continue accommodating pedestrian circulation, to the greatest degree possible, in terms of adequately-sized, conveniently located, safe, functional, unobstructed, and disabled-accessible major- and small-street public sidewalks, public crosswalks, private walkways and access routes, private walkways/access route linkages to public sidewalks, and sufficient connections between public sidewalks and crosswalks.
24. Observe the requirements imposed by the California Environmental Quality Act (CEQA) when reviewing any public or private proposals, including, but not limited to, infrastructure alteration or the development, redevelopment, modification, or expansion/remodeling of properties, to address all applicable potential traffic, circulation, and/or infrastructure impacts.

City of Covina Bicycle Master Plan

The City of Covina Bicycle Master Plan identifies improvements and policies to increase the bicycling population; increase cyclists' trip frequency and distance; improve bicyclist, pedestrian and motorist safety; and increase public awareness and support for bicycling. In terms of infrastructure, the Bicycle Master Plan provides direction for expanding the City's existing bikeway network and integrating the system into the surrounding countywide bikeway and public transit network. The system-wide approach for connecting gaps will ensure greater local and regional connectivity. The Bicycle Master Plan identifies Class I, Class II, Class III bicycle facilities throughout the City.

City of Covina Municipal Code

The City of Covina Municipal Code Section 17.72.010 provides regulations for off-street parking. The following Municipal Code parking requirements are for land uses proposed by the Project.

- Multiple Family Residential:
 - Bachelor/One-Bedroom units 2.0 parking spaces for each dwelling unit
 - Two-Bedroom units 2.5 parking spaces for each dwelling unit
 - Three-Bedroom units 3.0 parking spaces for each dwelling unit
 - Guest Parking 1.0 parking space for every 5 dwelling units
- Professional Offices: 1.0 parking space for each 250 square feet of gross floor area
- Food/Beverage Establishments: 1.0 parking space for each 200 square feet of gross floor area.

Municipal Code Section 11.08.300 Permit work – Warning signs, lights and barricades: Requires that a project performing work which interferes with or endangers the safe movement of traffic shall have the work safeguarded by adequate warning signs, barricades, lights and devices. Project shall be responsible for placing and maintaining adequate warning signs, barricades, lights and devices during all periods during which traffic movement is interfered with or endangered in order to promote the safe movement of traffic, including but not limited to periods of twilight, nighttime, fog and/or rain. All warning signs, barriers, barricades, flags and other devices shall comply with or exceed the standards required in the Vehicle Code.

5.13.3 ENVIRONMENTAL SETTING

Traffic Study Area and Existing Levels of Service

The traffic study area was identified based on direction from City of Covina staff and includes eight roadways, which are detailed in Table 5.13-1.

Table 5.13-1: Existing Study Area Roadway Descriptions

Roadway	Classification	Travel Lanes		Median	Speed Limit
		Direction	No. of Lanes		
Lark Ellen Avenue	Secondary Highway Collector Residential Main	NB-SB	4	N/A	40
-North of Queensdale Drive		NB-SB	4	N/A	40
-North of Grovecenter Street		NB-SB	4	N/A	40
-South of Grovecenter Street					
Rimsdale Avenue	Local Street	NB-SB	2	N/A	25
Azusa Avenue	Primary Arterial Mixed-Use Thoroughfare	NB-SB	4	Raised Medians	40
-North of Badillo Street		NB-SB	4		40
-South of Badillo Street		NB-SB	4 to 2	N/A	35
Hollenbeck Avenue					
Cypress Street	Secondary Highway Collector Collector	EB-WB	4	N/A	40
-West of Leaf Avenue		EB-WB	4	N/A	40
-East of Leaf Avenue		EB-WB	4	N/A	35 to 40
San Bernardino Road					
Badillo Street	Mixed-Use Main Secondary Arterial	EB-WB	4	Raised Medians	40
-West of Lark Ellen Avenue		EB-WB	4		45
-East of Lark Ellen Avenue		EB-WB	4 to 2	N/A	40
Puente Avenue	Residential Main	EB-WB			

Source: TIS, Appendix L.

The traffic study area also includes 13 study intersections (shown on Figure 5.13-1) that provide local access to the Project site and have the greatest potential to experience significant traffic impacts from the Project. Seven of the 13 study intersections are located within the City of Covina, two study intersections are located within the City of West Covina, three study intersections are shared between the Cities of Covina and West Covina, and one study intersection is located within the unincorporated area of the County of Los Angeles.

The study intersections include the following:

1. Lark Ellen Avenue/Cypress Street (Los Angeles County)
2. Lark Ellen Avenue/San Bernardino Road (Covina, West Covina)
3. Lark Ellen Avenue/Badillo Street (Covina, West Covina)
4. Lark Ellen Avenue/Puente Avenue (West Covina)
5. Rimsdale Avenue/San Bernardino Road (Covina)
6. Rimsdale Avenue/Badillo Street (Covina)
7. Azusa Avenue/Cypress Street (Covina)
8. Azusa Avenue/San Bernardino Road (Covina)
9. Azusa Avenue/Badillo Street (Covina, West Covina)
10. Azusa Avenue/Puente Avenue (West Covina)
11. Armel Drive/Badillo Street (Covina)
12. Hollenbeck Avenue/San Bernardino Road (Covina)
13. Hollenbeck Avenue/Badillo Street (Covina)

Twelve of the 13 study intersections selected for analysis are currently controlled by traffic signals. Intersection 11 (Armel Drive and Badillo Street), is the controlled by stop signs on Armel Drive. The existing traffic volumes for intersections based on peak hour intersection turn movement counts and daily counts collected in September 2019. Table 5.13-2 shows that one of the study intersections (i.e., Intersection No. 10: Azusa Avenue/Puente Avenue) is currently operating at LOS E during the weekday PM peak hour.

Table 5.13-2: Existing Intersection Levels of Service

Intersection	Peak Hour	Delay	LOS
1 Lark Ellen Avenue / Cypress Street [c]	AM PM	0.697 0.765	B C
2 Lark Ellen Avenue / San Bernardino Road [a,b]	AM PM	0.639 0.666	B B
3 Lark Ellen Avenue / Badillo Street [a,b]	AM PM	0.650 0.727	B C
4 Lark Ellen Avenue / Puente Avenue [b]	AM PM	0.624 0.643	B B
5 Rimsdale Avenue / San Bernardino Road [a]	AM PM	0.374 0.544	A A
6 Rimsdale Avenue / Badillo Street [a]	AM PM	0.531 0.457	A A
7 Azusa Avenue / Cypress Street [a]	AM PM	0.649 0.714	B C
8 Azusa Avenue / San Bernardino Road [a]	AM PM	0.669 0.678	B B
9 Azusa Avenue / Badillo Street [a,b]	AM PM	0.775 0.829	C D
10 Azusa Avenue / Puente Avenue [b]	AM PM	0.872 0.903	D E
11 Armel Drive/ Badillo Street [a,d]	AM PM	33.3 32.3	D D
12 Hollenbeck Avenue /	AM	0.771	C

Intersection	Peak Hour	Delay	LOS
San Bernardino Road [a]	PM	0.847	D
13 Hollenbeck Avenue / Badillo Street [a]	AM	0.657	B
	PM	0.706	C

Source: TIS, Appendix L.

[a] City of Covina Threshold; [b] City of West Covina Threshold; [C] County of Los Angeles Threshold

Bold = Exceeds LOS Standard/Threshold Exceedance

Existing Site Access

Vehicular access to the existing site for Planning Areas 1 and 2 is currently provided by seven existing curb cuts, including: one driveway on San Bernardino Road, three driveways on Rimsdale Avenue, and three driveways on Badillo Street.

Existing Transit Service

The Project area is served by bus service via Foothill Transit Authority and the City of West Covina and train service by Metrolink. The Foothill Transit Authority operates one local bus route to the vicinity of the Project (Route 190). Route 190 operates along Badillo Street and North Citrus Avenue with service to the Cities of El Monte, Baldwin Park, and Pomona. Route 190 operates with 15-minute headway during the weekday AM and PM peak periods.

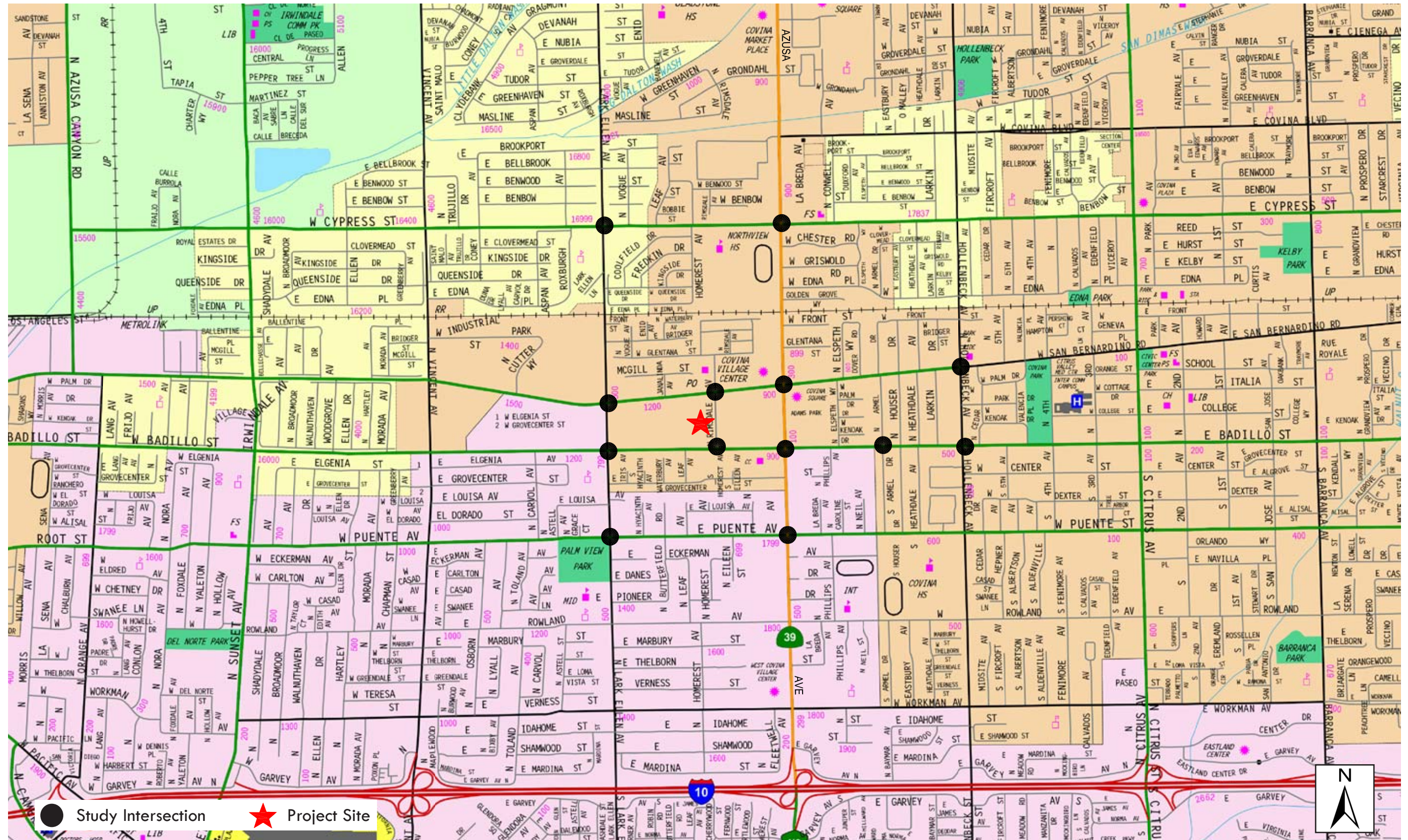
The Metrolink Covina Station is located approximately 1.5 miles to the east of the Project site at 600 North Citrus Avenue and connects with the public bus system. The Metrolink provides direct access to Downtown Los Angeles (to the west) and San Bernardino (to the east). As summarized in Table 5.13-3, during the weekday AM peak hour, three trains per hour are provided at the Covina station: two travel westbound to Los Angeles Union Station, and one travels eastbound to the City of San Bernardino. During the weekday PM peak hour, three trains per hour are provided at the Covina station: two travel eastbound to the City of San Bernardino, and one travels westbound to Los Angeles Union Station. Parking is provided at an on-site surface lot and an adjacent garage, both of which are City-owned.

Table 5.13-3: Existing Transit Routes

Route	Destinations	Location Near Site	Service During Weekday Peak Hour		
			Direction	AM	PM
Foothill Transit 190	Pomona to El Monte via Covina, West Covina, and Baldwin Park	Lark Ellen Avenue, Rimsdale Avenue, Azusa Avenue, San Bernardino Road	EB WB	4 4	4 3
Foothill Transit 280	Puente Hills to Azusa via La Puente, West Covina, and Covina	Azusa Avenue, San Bernardino Road, Badillo Street, Puente Avenue	NB SB	4 4	4 4
Foothill Transit 488	Glendora to El Monte via Covina, West Covina, and Baldwin Park	Lark Ellen Avenue, Azusa Avenue, Rowland Avenue	EB WB	3 3	2 2
West Covina Blue Line	City of West Covina	Lark Ellen Avenue, Badillo Street	Circular	2	2
West Covina Red Line	City of West Covina	Azusa Avenue, Puente Avenue	Circular	2	2
Metrolink	San Bernardino to Downtown Los Angeles via Rialto, Fontana, Rancho Cucamonga, Upland, Montclair, Claremont, Pomona, Covina, Baldwin Park, El Monte and Cal State LA	Citrus Avenue, Front Street	EB WB	1 2	2 1
			Total	29	26

Source: TIS, Appendix L.

Transportation Study Area Intersections



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Existing Bicycle and Pedestrian Facilities

Bicycle facilities within 0.25 mile of the Project site include:

- a Class II bicycle lane on W. Badillo Street from Lark Ellen Avenue to Cypress Street;
- a Class II bicycle lane on San Bernardino Road west of Hollenbeck Avenue and east of Second Avenue;
- a Class III Bike lane on San Bernardino Road from Hollenbeck Avenue to Second Avenue.

Additionally, sidewalks currently exist adjacent to the site along W. San Bernardino Road, N. Rimsdale Avenue, and W. Badillo Street.

5.13.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- TR-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- TR-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);
- TR-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- TR-4 Result in inadequate emergency access.

Intersection Thresholds

City of Covina LOS Significance Criteria

The City of Covina utilizes the LOS significance thresholds as identified below from the City's Traffic Impact Analysis Guidelines (May 2014). An impact is considered significant if the project-related increase in the volume-to-capacity (v/c) ratio equals or exceeds the thresholds shown in Table 5.13-4.

Table 5.13-4: City of Covina Traffic Thresholds of Significance

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

City of West Covina LOS Significance Criteria

The City of West Covina, a significant transportation impact is also determined based on the increase in the volume-to-capacity (v/c) ratio, which is shown in Table 5.13-5.

Table 5.13-5: City of West Covina Traffic Thresholds of Significance

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

County of Los Angeles LOS Significance Criteria

According to the County of Los Angeles Department of Public Works' Traffic Impact Analysis Report Guidelines, January 1997, an impact is considered significant if the project-related increase in the v/c ratio equals or exceeds the threshold criteria presented in Table 5.13-6.

Table 5.13-6: County of Los Angeles Traffic Thresholds of Significance

Pre-Project v/c	Level of Service	Project Related Increase in v/c
> 0.70 - 0.80	C	equal to or greater than 0.04
> 0.80 - 0.90	D	equal to or greater than 0.02
> 0.90	E and F	equal to or greater than 0.01

Vehicle Miles Traveled Significance Criteria

Section 15064.3(b)(1) of the CEQA Guidelines provides that for land use projects:

VMT traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

In December 2018, OPR issued a Technical Advisory on evaluating transportation impacts in CEQA that provides the following screening criteria for land development projects that may result in a less than significant VMT impact:

- Local-serving retail less than 50,000 square feet, including schools, daycare, student housing, etc.
- Small projects generating less than 110 trips per day
- Residential and office projects located in areas with low-VMT
- Projects near transit stations or a major transit stop that is located along a high quality transit corridor
- Residential projects with a high percentage of affordable housing

In addition, the Technical Advisory describes that projects with the following may result in a VMT impact:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the Lead Agency with input from the Metropolitan Planning Organization).

The City of Covina recently adopted Resolution CC 2020-56 regarding VMT thresholds of significance, which are consistent with OPRs screening criteria. Therefore, Project-related VMT impact has been assessed qualitatively based on guidance from the OPR Technical Advisory.

5.13.5 METHODOLOGY

The transportation analysis follows the City of Covina transportation study guidelines.

Project Trip Generation Methodology

The trip generation potential of the proposed Project was estimated using trip rates contained in the 10th Edition of the *Trip Generation Manual*, published by the Institute of Transportation Engineers (ITE), [Washington, D.C., 2017].

Volume Forecast Methodology

The following analysis scenarios were prepared for the weekday AM and weekday PM peak hour conditions to determine traffic volumes generated from implementation of the Project:

- (a) Existing Traffic Conditions;
- (b) Existing Plus Project (development of Planning Areas 1 and 2) Traffic Conditions;
- (c) Future 2024 Opening Year Traffic Conditions;
- (d) Future 2024 Opening Year Plus Project (Planning Areas 1 and 2) Traffic Conditions;
- (e) Future 2040 Cumulative (with buildout of Planning Areas 3 and 4) Traffic Conditions;
- (f) Future 2040 Cumulative (with buildout of Planning Areas 3 and 4) Plus Project (development of Planning Areas 1 and 2) Traffic Conditions;
- (g) Scenario (g) with Mitigation, if necessary.

The LOS calculations will be prepared using the Intersection Capacity Utilization (ICU) methodology for signalized intersections and the Highway Capacity Manual (HCM) methodology for unsignalized intersections. See the Traffic Impact Analysis (Appendix L) for additional detail.

5.13.6 ENVIRONMENTAL IMPACTS

IMPACT TR-1: THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.

Less than Significant Impact with Mitigation Incorporated.

Construction

Construction of the proposed development within Planning Areas 1 and 2 would generate vehicular trips from construction workers traveling to and from the site, delivery of construction supplies and import materials to, and export of debris from the site. However, these activities would only occur for a period of 15 months. The grading phase of construction would require the most vehicular trips and would occur over a 20-day period, as shown in Table 3-6, Construction Schedule. The Energy Tables (Appendix A) describes that grading would require 375 haul trips per day. In addition, approximately 15 workers would be onsite daily during the grading activities. Thus, approximately 390 trips per day would occur from the most intensive construction activity.

As shown below in Table 5.13-8, significant traffic impacts would not occur in the Existing Plus Project condition with the addition of 1,081 new daily trips, with 133 AM peak hour trips, and 97 PM peak hour trips. The increase of trips during construction activities would be 64 percent fewer trips than the trips from operation of Planning Areas 1 and 2, which result in a less than significant impact as demonstrated below. Therefore, the 64 percent fewer trips during construction of Planning Areas 1 and 2 would also be less than significant. Furthermore, PPP TR-1 would implement Municipal Code Section 11.08.300 which requires projects performing work which interferes with or endangers the safe movement of traffic are required to have the work safeguarded by adequate warning signs, barricades, lights and devices. This includes placing

and maintaining adequate warning signs, barricades, lights and devices during all periods during which traffic movement is interfered with or endangered in order to promote the safe movement of traffic, including but not limited to periods of twilight, nighttime, fog and/or rain. Mitigation Measure TR-1 has been included and requires implementation of a construction traffic control plan that would be approved by the City prior to issuance of construction permits. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities.

As previously discussed, development of Planning Areas 3 and 4 is not proposed at this time. The CBSP Mixed Use land use designation would accommodate a maximum development intensity within Planning Areas 3 and 4 of either 41,419 square feet of retail or 63 multi-family units. The maximum number of trips that would be generated by Planning Areas 3 and 4 would be 834 new daily trips, 23 AM peak hour trips, and 94 PM peak hour trips; operation related trips result in a less than significant impact with mitigation as demonstrated below. Although specific construction details are not available and cannot be speculated at this time, it is anticipated, based on the allowable land uses and parcel sizes, that construction related trips would be fewer operation-related trips. In addition, PPP TR-1 and Mitigation Measure TR-1 are included to ensure that future construction in Planning Areas 3 and 4 would not result in traffic impacts. Therefore, impacts would be less than significant with implementation of mitigation.

Operation

The proposed Project would generate traffic from development in Planning Areas 1 and 2 that includes 132 residential townhome units and 12,000 square feet of commercial and office space. In addition, the Project buildout (Year 2040) condition includes removal of existing buildings and development of 4,175 square-feet of commercial/office or housing space in Planning Area 3 and development of 37,244 square feet of commercial/office or housing space in Planning Area 4.

Project Trip Generation

Traffic generation is identified by vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Vehicle trips for the Project were generated by using the trip rates from the Institute of Transportation Engineers (ITE) Trip Generation (10th Edition, 2017). As shown in Table 5.13-7, The proposed Project, which includes new development in Planning Areas 1 and 2 is expected to generate 133 new vehicle trips (60 inbound trips and 73 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the proposed project is expected to generate 97 new vehicle trips (50 inbound trips and 47 outbound trips). Over a 24-hour period, the proposed project is forecast to generate approximately 1,081 new daily trip ends during a typical weekday.

Table 5.13-7: Proposed Specific Plan (PA 1 and 2) Trip Generation

Land Use	Size	Daily Trip Ends ² Volumes	AM Peak Hour Volumes ²			PM Peak Hour Volumes ²		
			In	Out	Total	In	Out	Total
Residential Townhome ³	132 DU	718	12	36	48	35	23	58
Office ⁴	11,050 GSF	108	11	2	13	2	11	13
Coffee Shop ⁵	950 GSF	340	49	47	96	17	17	34
Less Internal Capture/ Pass-by Adjustment (25%) ⁶		(85)	(12)	(12)	(24)	(4)	(4)	(8)
Total		1,081	60	73	133	50	47	97

Source: TIS, Appendix L.

¹ Source: ITE "Trip Generation Manual", 10th Edition, 2017.

² Trips are one-way traffic movements, entering or leaving.

³ ITE Land Use Code 221 (Multifamily Housing [Mid-Rise]) trip generation average rates.

- Daily Trip Rate: 5.44 trips/dwelling unit; 50% inbound/50% outbound

- AM Peak Hour Trip Rate: 0.36 trips/dwelling unit; 26% inbound/74% outbound

- PM Peak Hour Trip Rate: 0.44 trips/dwelling unit; 61% inbound/39% outbound

⁴ ITE Land Use Code 710 (General Office) trip generation average rates.

- Daily Trip Rate: 9.74 trips/1,000 SF of gross floor area; 50% inbound/50% outbound

- AM Peak Hour Trip Rate: 1.16 trips/1,000 SF of gross floor area; 86% inbound/14% outbound

- PM Peak Hour Trip Rate: 1.15 trips/1,000 SF of gross floor area; 16% inbound/84% outbound
 - ⁵ ITE Land Use Code 936 (Coffee/Donut Shop without Drive-Through) trip generation average rates.
 - Daily Trip Rate: Not available; PM peak hour trip rates assumed to be 10 percent of total daily trips.
 - AM Peak Hour Trip Rate: 101.14 trips/1,000 SF of gross floor area; 51% inbound/49% outbound
 - PM Peak Hour Trip Rate: 36.31 trips/1,000 SF of gross floor area; 50% inbound/50% outbound
 - ⁶ An internal trip adjustment was included to account for the synergistic effects between the office, residential, and coffee shop land use components.
- The internal capture adjustment factor of 25 percent was applied to the coffee shop component.

Existing Plus Project (Planning Areas 1 and 2)

Table 5.13-8 provides a comparison between the existing without and with the proposed Project development conditions. As shown, all study area intersections would continue to operate at satisfactory LOS in the Existing Plus Project condition, except for Intersection 10 (Azusa Avenue/Puente Avenue), which has an LOS of E in the existing condition. As shown on Table 5.13-8, implementation of the Planning Areas 1 and 2 would result in a less than significant delay increase of 0.001. As a result, impacts would be less than significant.

Table 5.13-8: Existing Plus Project (Planning Areas 1 and 2) Intersection Levels of Service Conditions

Intersection	Peak Hour	Existing Delay	Existing LOS	Existing Plus Project Delay	Existing Plus Project LOS	Impact?
1 Lark Ellen Avenue / Cypress Street [c]	AM PM	0.697 0.765	B C	0.701 0.767	C C	No No
2 Lark Ellen Avenue / San Bernardino Road [a,b]	AM PM	0.639 0.666	B B	0.650 0.675	B B	No No
3 Lark Ellen Avenue / Badillo Street [a,b]	AM PM	0.650 0.727	B C	0.659 0.732	B C	No No
4 Lark Ellen Avenue / Puente Avenue [b]	AM PM	0.624 0.643	B B	0.629 0.645	B B	No No
5 Rimsdale Avenue / San Bernardino Road [a]	AM PM	0.374 0.544	A A	0.385 0.557	A A	No No
6 Rimsdale Avenue / Badillo Street [a]	AM PM	0.531 0.457	A A	0.546 0.466	A A	No No
7 Azusa Avenue / Cypress Street [a]	AM PM	0.649 0.714	B C	0.651 0.718	B C	No No
8 Azusa Avenue / San Bernardino Road [a]	AM PM	0.669 0.678	B B	0.682 0.683	B B	No No
9 Azusa Avenue / Badillo Street [a,b]	AM PM	0.775 0.829	C D	0.784 0.838	C D	No No
10 Azusa Avenue / Puente Avenue [b]	AM PM	0.872 0.903	D E	0.876 0.904	D E	No No
11 Armel Drive / Badillo Street [a,d]	AM PM	33.3 32.3	D D	34.1 32.9	D D	No No
12 Hollenbeck Avenue / San Bernardino Road [a]	AM PM	0.771 0.847	C D	0.776 0.851	C D	No No
13 Hollenbeck Avenue / Badillo Street [a]	AM PM	0.657 0.706	B C	0.659 0.708	B C	No No

Source: TIS, Appendix L.

[a] City of Covina Threshold

[b] City of West Covina Threshold

[c] County of Los Angeles Threshold

[d] Unsignalized Intersection Threshold

Bold = Threshold Exceedance

Opening Year (2024) Plus Project (Planning Areas 1 and 2)

Pursuant to the City of Covina's *Traffic Impact Analysis Guidelines*, the Opening Year (2024) traffic volumes were developed by applying a growth rate of 1.0 percent per year to the existing (2019) traffic volumes and adding traffic generated by cumulative projects, which include approved and pending development

projects on file at the City of Covina, the City of West Covina, and the County of Los Angeles. As shown in Table 5.13-9, the cumulative projects are anticipated to generate 864 a.m. peak hour trips, 937 p.m. peak hour trips, and 10,840 daily trips.

In the Opening Year (2024) (with the cumulative project trips listed in Table 5.13-9), three of the study intersections are anticipated to operate at LOS E during the AM and/or PM peak hours. Intersection No. 10: Azusa Avenue/Puente Avenue and Intersection No. 11: Armel Drive/Badillo Street would operate at LOS E in both the AM and PM peak hours and Intersection No. 12: Hollenbeck Avenue/San Bernardino Road) would operate at LOS E in the PM peak hour.

The addition of traffic from operation of Planning Areas 1 and 2, would not result in an exceedance of thresholds at any of the intersections, as shown on Table 5.13-10. Thus, impacts in the Opening Year (2024) Plus Project (Planning Areas 1 and 2) condition would be less than significant. Table 5.13-10 provides a comparison between the Opening Year (2024) Without and With Project conditions.

Table 5.13-9: Summary of Cumulative Project Trips

Project No.	Project Status	Project Name Address/Location	Land Use	Size		Trip Rate Source	Daily Trips	AM Peak Hour Volumes			PM Peak Hour Volumes		
								In	Out	Total	In	Out	Total
City of Covina													
C1	Under	City Ventures Covina 3	Condominium	68	DU	[3]	395	5	25	30	23	12	35
	Construction	400 Block North Citrus Avenue	Retail	5,794	GLSF	[4]	247	4	2	6	10	11	21
C2	Proposed	Covina Townhomes (Site A)	Townhome	161	DU	[5]	1,700	36	72	108	87	58	145
		NWC of Citrus Avenue & San Bernardino Road	Restaurant	3,800	GSF								
			Retail	13,500	GLSF								
C3b	Under	Covina Townhomes	Townhome	18	DU	[6]	219	6	7	13	11	10	21
C3c	Construction	(Sites B1, B2 & C)	Retail	3,370	GLSF								
			Office	1,030	GSF								
C4	Under	1162 North Citrus Avenue	Condominium	117	DU	[3]	680	9	42	51	41	20	61
	Construction												
C5	Approved	North Citrus Avenue & East Covina Boulevard	Office	15,000	GSF	[7]	165	20	3	23	4	18	22
			Event Center	25,000	GSF	[8]	846	34	17	51	34	35	69
C6	Under	276 West Dexter Street	Condominium	3	DU	[3]	17	0	1	1	1	1	2
	Construction												
C7	Under	172 East Center Street	Apartment	5	DU	[9]	33	1	2	3	2	1	3
	Construction												
C8	Approved	525 South Citrus Avenue	Retail/Office	5,900	GLSF	[4]	252	4	2	6	11	11	22
			Restaurant	5,000	GSF	[10]	2,481	116	111	227	85	78	163
C9	Under	Covina Transit Center	Retail	4,800	GLSF	[11]	181	3	2	5	9	9	18
	Construction	Park & Ride	Parking Structure	359	Spaces	[12]	1,393	128	30	158	49	148	197
		North Citrus Avenue & Covina Boulevard											
City of West Covina													
WC1	Proposed	Chick-fil-A	Restaurant	4,214	GSF	[13]	1,985	86	83	169	72	66	138
		200 South Vincent Avenue											
		1611-1623 West San Bernardino Road											
WC2	Proposed		Condominium	24	DU	[14]	176	3	8	11	8	5	13
County of Los Angeles													
LC1	Proposed	16741 East Arrow Hwy	Retail	1,856	GLSF	[10]	70	1	1	2	3	4	7
Total							10,840	456	378	864	450	487	937

Source: TIS, Appendix L.

¹ ITE "Trip Generation Manual", 9th Edition, 2012 and 10th Edition, 2017, except as noted.³ Land Use 230 - Residential Condominium/Townhouse (9th Edition trip generation average rates)⁴ Land Use 820 - Shopping Center (9th Edition trip generation average rates)⁵ Source: "Covina Townhomes (Site A) Project Traffic Impact Study", prepared by LLG Engineers, May 9, 2018.⁶ Source: "Covina Townhomes Project Traffic Impact Study", prepared by LLG Engineers, October 9, 2017.

⁷ Land Use 710 - General Office Building (9th Edition trip generation average rates)

⁸ Land Use 495 – Residential Community Center (9th Edition trip generation average rates)

⁹ Land Use 220 – Apartment (9th Edition trip generation average rates)

¹⁰ Land Use 934 – Fast-Food Restaurant with Drive-Through (9th Edition trip generation average rates)

¹¹ Land Use 820 - Shopping Center (10th Edition trip generation average rates)

¹² Land Use 090 - Park-and-Ride Lot w/ Bus or Light Rail Service (10th Edition trip generation average rates)

¹³ Land Use 934 – Fast-Food Restaurant with Drive-Through (10th Edition trip generation average rates)

¹³ Land Use 220 - Multifamily Housing - Low-Rise (10th Edition trip generation average rates)

Table 5.13-10: Opening Year (2024) Plus Project (Planning Areas 1 and 2) Intersection Levels of Service

Intersection	Peak Hour	2024 Delay	2024 LOS	2024 Plus Project Delay	2024 Plus Project LOS	Change in Delay	Impact?
1 Lark Ellen Avenue / Cypress Street [c]	AM	0.732	C	0.736	C	0.004	No
	PM	0.806	D	0.808	D	0.002	No
2 Lark Ellen Avenue / San Bernardino Road [a,b]	AM	0.677	B	0.688	B	0.011	No
	PM	0.708	C	0.717	C	0.009	No
3 Lark Ellen Avenue / Badillo Street [a,b]	AM	0.681	B	0.690	B	0.009	No
	PM	0.763	C	0.768	C	0.005	No
4 Lark Ellen Avenue / Puente Avenue [b]	AM	0.657	B	0.662	B	0.005	No
	PM	0.676	B	0.678	B	0.002	No
5 Rimsdale Avenue / San Bernardino Road [a]	AM	0.397	A	0.408	A	0.011	No
	PM	0.578	A	0.591	A	0.013	No
6 Rimsdale Avenue / Badillo Street [a]	AM	0.558	A	0.573	A	0.015	No
	PM	0.480	A	0.489	A	0.009	No
7 Azusa Avenue / Cypress Street [a]	AM	0.689	B	0.691	B	0.002	No
	PM	0.763	C	0.767	C	0.004	No
8 Azusa Avenue / San Bernardino Road [a]	AM	0.712	C	0.725	C	0.013	No
	PM	0.727	C	0.731	C	0.004	No
9 Azusa Avenue / Badillo Street [a,b]	AM	0.820	D	0.829	D	0.009	No
	PM	0.878	D	0.887	D	0.009	No
10 Azusa Avenue / Puente Avenue [b]	AM	0.930	E	0.934	E	0.004	No
	PM	0.958	E	0.959	E	0.001	No
11 Armel Drive/ Badillo Street [a,d]	AM	36.7	E	37.7	E	1.0	No
	PM	36.4	E	37.1	E	0.7	No
12 Hollenbeck Avenue / San Bernardino Road [a]	AM	0.837	D	0.842	D	0.005	No
	PM	0.916	E	0.920	E	0.004	No
13 Hollenbeck Avenue / Badillo Street [a]	AM	0.700	B	0.703	C	0.003	No
	PM	0.749	C	0.751	C	0.002	No

Source: TIS, Appendix L. **Bold** = Exceeds LOS Standard/Threshold Exceedance

[a] City of Covina Threshold

[b] City of West Covina Threshold

[c] County of Los Angeles Threshold

[d] Unsignalized Intersection Threshold

Year 2040 Plus Project (Planning Areas 1 through 4)

Year 2040 Without Project traffic volumes were developed by applying a growth rate of 0.5 percent per year to the Opening Year (2024) traffic volumes (which include cumulative projects) through year 2040. Four of the study intersections are anticipated to operate at LOS E during the AM and/or PM peak hours in the 2040 Without Project condition. Intersection No. 10: Azusa Avenue/Puente Avenue and Intersection No. 11: Armel Drive/Badillo Street would operate at LOS E or LOS F in both the AM and PM peak hours; and Intersection No. 9: Azusa Avenue/Badillo Street and No. 12: Hollenbeck Avenue/San Bernardino Road) would operate at LOS E in the PM peak hour.

To identify the Year 2040 Plus Project condition, the trips from buildout of Planning Areas 1 through 4 were added to the 2040 Without Project condition. While no specific development is proposed at this time for Planning Areas 3 and 4, the maximum potential buildout is included as part of the cumulative Specific Plan buildout (Year 2040) condition to provide a conservative analysis of all potential vehicular trips. Under this scenario, analysis of Planning Area 3 includes removal of the existing office space and development of a 4,175 square-foot retail space, which would generate 118 daily trips and 11 PM peak hour trips. The maximum potential buildout of Planning Area 4 includes removal of the existing apartment building and restaurant and development of 37,244 square feet of retail space, which would generate 716 daily trips and 83 PM peak hour trips. As shown in Table 5.13-11, the maximum buildout of both Planning Areas 3 and 4 result in 834 daily trips, 94 of which occur in the PM peak hour.

Table 5.13-11: Trip Generation of Maximum Buildout of Planning Areas 3 and 4

	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Planning Area 3								
Retail Development [5]	4,175 GLSF	158	2	2	4	8	8	16
- Less Existing Office [4]	(4,175) GSF	(40)	(4)	(1)	(5)	(1)	(4)	(5)
Total Planning Area 3		118	(2)	1	(1)	7	4	11
Planning Area 4								
Retail Development [5]	37,244 GLSF	1,406	22	13	35	68	74	142
- Less Existing Apartments [3]	(31) DU	(168)	(3)	(8)	(11)	(9)	(5)	(14)
- Less Existing Restaurant [4]	(4,652) GSF	(522)	(25)	(21)	(46)	(28)	(17)	(45)
Total Planning Area 4		716	(6)	(16)	(22)	31	52	83
Total Trips with Maximum Buildout of Planning Areas 3 and 4		834	(8)	(15)	(23)	38	56	94

Source: TIS, Appendix L.

ITE "Trip Generation Manual", 10th Edition, 2017.

³ ITE Land Use Code 221 (Multifamily Housing [Mid-Rise])

- Daily Trip Rate: 5.44 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.36 trips/dwelling unit; 26% inbound/74% outbound
- PM Peak Hour Trip Rate: 0.44 trips/dwelling unit; 61% inbound/39% outbound

⁴ ITE Land Use Code 932 (High-Turnover [Sit-Down] Restaurant)

- Daily Trip Rate: 112.18 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 9.94 trips/1,000 SF of floor area; 55% inbound/45% outbound
- PM Peak Hour Trip Rate: 9.77 trips/1,000 SF of floor area; 62% inbound/38% outbound

⁵ ITE Land Use Code 820 (Shopping Center)

- Daily Trip Rate: 37.75 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.94 trips/1,000 SF of floor area; 62% inbound/38% outbound
- PM Peak Hour Trip Rate: 3.81 trips/1,000 SF of floor area; 48% inbound/52% outbound

The addition of traffic from operation of Planning Areas 1 through 4 in the 2040 condition, would result in an exceedance of thresholds at Intersection No. 9: Azusa Avenue/Badillo Street, as shown on Table 5.13-12. Table 5.13-12 provides a comparison between the Year (2040) Without and With Project conditions.

Table 5.13-12: Year (2040) Plus Project (Planning Areas 1 - 4) Intersection Levels of Service

Intersection	Peak Hour	2040 Delay	2040 LOS	2040 Plus Project Delay	2040 Plus Project LOS	Change in Delay	Impact?
1 Lark Ellen Avenue / Cypress Street [c]	AM	0.783	C	0.787	C	0.004	No
	PM	0.864	D	0.868	D	0.004	No
2 Lark Ellen Avenue / San Bernardino Road [a,b]	AM	0.728	C	0.738	C	0.010	No
	PM	0.761	C	0.783	C	0.022	No
3 Lark Ellen Avenue / Badillo Street [a,b]	AM	0.728	C	0.738	C	0.010	No
	PM	0.816	D	0.824	D	0.008	No
4 Lark Ellen Avenue / Puente Avenue [b]	AM	0.703	C	0.708	C	0.005	No
	PM	0.723	C	0.727	C	0.004	No
5 Rimsdale Avenue / San Bernardino Road [a]	AM	0.425	A	0.434	A	0.009	No
	PM	0.621	B	0.647	B	0.026	No
6 Rimsdale Avenue / Badillo Street [a]	AM	0.600	A	0.612	B	0.012	No
	PM	0.515	A	0.530	A	0.015	No
7 Azusa Avenue / Cypress Street [a]	AM	0.741	C	0.743	C	0.002	No
	PM	0.515	D	0.828	D	0.007	No
8 Azusa Avenue / San Bernardino Road [a]	AM	0.766	C	0.776	C	0.010	No
	PM	0.782	C	0.797	C	0.015	No
9 Azusa Avenue / Badillo Street [a,b]	AM	0.883	D	0.890	D	0.007	No
	PM	0.946	E	0.961	E	0.015	Yes
10 Azusa Avenue / Puente Avenue [b]	AM	0.997	E	1.000	E	0.003	No
	PM	1.028	F	1.032	F	0.004	No
11 Armel Drive/ Badillo Street [a,d]	AM	52.1	F	53.3	F	1.2	No
	PM	44.2	E	46.1	E	1.9	No
12 Hollenbeck Avenue / San Bernardino Road [a]	AM	0.900	D	0.904	E	0.004	No
	PM	0.986	E	0.993	E	0.007	No
13 Hollenbeck Avenue / Badillo Street [a]	AM	0.753	C	0.755	C	0.002	No
	PM	0.807	D	0.811	D	0.004	No

Source: TIS, Appendix L. **Bold** = Exceeds LOS Standard

[a] City of Covina Threshold

[b] City of West Covina Threshold

[c] County of Los Angeles Threshold

Due to the impact at Intersection No. 9: Azusa Avenue/Badillo Street, Mitigation Measure TR-2 has been included to require fair share funding of improvements on Azusa Avenue to provide a third through lane. This would be done by, removing of on-street parking, narrowing of the median island, and removal of dedicated right-turn lanes, and roadway restriping. The resulting northbound and southbound intersection approach lanes on Azusa Avenue would consist of one left-turn lane, two through lanes, and one shared through/right-turn lane. Although the additional through lane would be accommodated within the existing pavement widths, it may also require the elimination of up to five existing curbside parking spaces along the west side of Azusa Avenue and seven existing curbside parking spaces along the east side of Azusa Avenue, south of the intersection. As shown in Table 5.13-13, implementation of Mitigation Measure TR-2 would reduce impacts to a less than significant level.

Table 5.13-13: Year (2040) Plus Project (Planning Areas 1- 4) with Mitigation

Intersection	Peak Hour	2040 Plus Project Delay	2040 Plus Project LOS	2040 Mitigated Delay/ LOS	Change in Delay
9 Azusa Avenue / Badillo Street [a,b]	AM	0.890	D	0.790 C	-0.093
	PM	0.961	E	0.847 D	-0.099

Source: TIS, Appendix L. **Bold** = Exceeds LOS Standard

[a] City of Covina Threshold

[b] City of West Covina Threshold

[c] County of Los Angeles Threshold

As shown in Table 5.13-14, the impact at the intersection of Azusa Avenue and Badillo Street in the Year 2040 PM peak hour would only occur at full buildout of all the Planning Areas. The proposed development in Planning Areas 1 and 2 would result in 60 percent of the Project contribution to the impact in the PM peak hour and the potential buildout of Planning Areas 3 and 4, for which no development is currently proposed, would contribute to the remaining 40 percent of the Project contribution to the impact.

Table 5.13-14: Summary of Year 2040 Impacts on Azusa Avenue at the Badillo Street Intersection

Intersection	Peak Hour	Year 2040 w/o Project		Year 2040 Plus PA 1 & 2		Delay Change	Impact ?	Year 2040 Plus PA 3 & 4		Delay Change	Impact ?	Year 2040 Plus All PAs		Delay Change	Impact ?
		Delay	LOS	Delay	LOS			Delay	LOS			Delay	LOS		
9 Azusa Avenue / Badillo Street	AM	0.883	D	0.892	D	0.009	No	0.881	D	-0.002	No	0.890	D	-0.007	No
	PM	0.946	E	0.955	E	0.009	No	0.952	E	0.006	No	0.961	E	-0.015	Yes

Source: TIS, Appendix L.

Notes: **Bold** = Exceeds LOS Standard

Further, as shown on Table 5.13-15, the Project's fair share of the impact at the intersection of Azusa Avenue and Badillo Street in the Year 2040 with buildout of all of the Planning areas would be 3.71 percent in the AM peak hour and 9.05 percent in the PM peak hour. The fair share impact of development of Planning Areas 1 and 2 alone would be 4.77 percent in the AM peak hour and 4.74 percent in the PM peak hour.

Table 5.13-15: Project Fair Share of Impacts at Azusa Avenue at the Badillo Street Intersection

Intersection	Existing	Project	Year 2040 w/o Project	Year 2040 with Project	Total New Traffic	Project % of New Traffic
AM Peak Hour (Planning Area 1 and 2)						
9. Azusa/Badillo	3,452	39	4,230	4,269	817	4.77%
PM Peak Hour (Planning Area 1 and 2)						
9. Azusa/Badillo	3,842	29	4,425	4,454	612	4.74%
AM Peak Hour (Full Specific Plan)						
9. Azusa/Badillo	3,452	30	4,230	4,260	808	3.71%
PM Peak Hour (Full Specific Plan)						
9. Azusa/Badillo	3,842	58	4,425	4,483	641	9.05%

Transit, Bicycle, and Pedestrian Facilities

Transit. As described previously, the Project area receives bus service via Foothill Transit Authority and the City of West Covina and train service by Metrolink. The Foothill Transit Authority operates one local bus routes to the vicinity of the Project (Route 190). Route 190 operates along Badillo Street and North Citrus Avenue with service to the Cities of El Monte, Baldwin Park, and Pomona. Route 190 operates with 15-minute headway during the weekday AM and PM peak periods.

The Metrolink Covina Station is located approximately 1.5 miles to the east of the Project site at 600 North Citrus Avenue and connects with the public bus system. The Metrolink provides direct access to Downtown Los Angeles (to the west) and San Bernardino (to the east). These existing transit services would serve residents and employees within the Project site. The proposed Project would not alter or conflict with existing transit stops and schedules, and impacts related to transit services would not occur.

Bicycle Facilities: As detailed previously, there are currently Class II and III bicycle lanes on W. Badillo Street and San Bernardino Road. The Project does not involve any off-site improvements that would remove the existing bicycle lanes or result in any identified impacts to bicycle routes. The existing bicycle routes would provide bicycle transportation opportunities for residents and employees within the Project site. In addition, as described in Section 3.0, *Project Description*, the proposed development includes bicycle parking in the commercial/office parking area to encourage bicycle transportation. Therefore, the Project would not conflict with any bicycle facilities.

Pedestrian Facilities: Similarly, sidewalks currently exist adjacent to the site along W. San Bernardino Road, N. Rimsdale Avenue, and W. Badillo Street. The proposed Project would retain the existing sidewalks and would develop pedestrian paths to provide for non-vehicular onsite circulation for connection to existing off-site sidewalks. This would facilitate pedestrian use and walking to nearby locations. Therefore, the proposed Project would also not conflict with pedestrian facilities. Overall, impacts related to transit, bicycle, and pedestrian facilities would be less than significant.

Parking Facilities

To determine whether the proposed parking for Planning Areas 1 and 2 would accommodate the anticipated demand, the Traffic Impact Study included a parking analysis. As no development is currently proposed for Planning Areas 3 and 4, and current parking for those areas are accommodated, Planning Areas 3 and 4 are not included. Application of the Municipal Code parking requirements, listed previously, for Planning Areas 1 and 2 results in the need for 465 spaces (416 spaces for the proposed residential and 49 spaces for the proposed commercial/office area) as shown below.

Proposed Residential

- One-Bedroom units	14 DU	x	2.0 spaces/DU	= 28 spaces
- Two-Bedroom units	24 DU	x	2.5 spaces/DU	= 60 spaces
- Three-Bedroom units	54 DU	x	3.0 spaces/DU	= 162 spaces
- Four-Bedroom units	40 DU	x	3.5 spaces/DU	= 140 spaces
- Guest parking	132 DU	x	0.2 spaces/DU	= <u>26 spaces</u>

Residential Total:

416 spaces

Proposed

Commercial/Office	11,050 GSF	1.0 space/250 SF	= 44 spaces
- Office			
- Coffee Shop	950 GSF	1.0 space/200 SF	= <u>5 spaces</u>

Commercial/Office Total:

49 spaces

Total Code Required Parking (Planning Areas 1 and 2) = 465 Spaces

However, 346 parking spaces are proposed for Planning Areas 1 and 2, with 309 spaces provided on-site and 37 spaces provided on-street along the west side of Rimsdale Avenue. The surface parking lot (with 33 spaces) adjacent to the building at the southwest corner of Rimsdale Avenue and San Bernardino Road and the angled street parking (with 37 spaces) proposed along the west side of Rimsdale Avenue are planned to be utilized by the office/coffee shop employees, patrons, and residential guests. The proposed 346 parking spaces is 119 spaces fewer than required by the Municipal Code.

Because the Project proposes a mix of uses, the Traffic Impact Study included a shared parking demand analysis based on data contained in the Third Edition of the Shared Parking manual published by the Urban Land Institute (ULI). Mixed land uses generally result in a reduced need in parking, as various land uses function differently and often have opposite parking demand timing. For example, the hourly parking demand for office uses (which generates its peak parking demand in the mid-morning and mid-afternoon hours) is different than the parking demand associated with residential uses (which generates its peak parking demand in the evening periods). Also, office uses experience their peak parking demands during weekdays and experience minimal parking demand during the weekends.

As shown on Table 5.13-16, the shared parking analysis identifies that with implementation of Planning Areas 1 and 2, a peak weekday parking demand of 337 spaces (97.4% utilization of the proposed 346 spaces) would occur at 10:00 AM and 2:00 PM.

Table 5.13-16: Weekday Shared Parking Demand Analysis

Land Use	Residential (One-Bedroom)	Residential (Two-Bedroom)	Residential (Three-/Four-Bedroom)	Office	Coffee Shop		
Size	14 DU	24 DU	94 DU	11.1 KSF	1.0 KSF		
Peak Rate	1.05 /DU	1.80 /DU	2.65 /DU	4.0 /KSF	5.0 /KSF		
Weekday Rate	1.00 /DU	1.75 /DU	2.60 /DU	4.0 /KSF	4.9 /KSF		
Time of Day	Parking Demand	Parking Demand	Parking Demand	Parking Demand	Parking Demand	Total Parking Demand	Surplus
6:00 AM	13	40	235	1	0	289	57
7:00 AM	13	40	236	6	1	296	50
8:00 AM	13	40	237	22	2	314	32
9:00 AM	13	40	237	39	2	331	15
10:00 AM	13	40	237	44	3	337	9
11:00 AM	13	40	237	42	4	336	10
12:00 PM	13	40	237	35	5	330	16
1:00 PM	13	40	237	36	5	331	15
2:00 PM	13	40	237	42	5	337	9
3:00 PM	13	40	237	40	3	333	13
4:00 PM	13	40	237	35	3	328	18
5:00 PM	13	41	239	25	3	321	25
6:00 PM	14	41	240	10	4	309	37
7:00 PM	14	42	244	6	4	310	36
8:00 PM	14	42	244	2	3	305	41
9:00 PM	14	42	244	1	1	302	44
10:00 PM	14	42	244	0	1	301	45
11:00 PM	14	42	242	0	0	298	48
12:00 AM	14	41	240	0	0	295	51

Source: TIS, Appendix L.

The weekend peak shared parking demand for Planning Areas 1 and 2 is anticipated to be less than the weekday peak parking demand. As shown in Table 5.13-17, a peak parking demand of 311 spaces (89.9% utilization of the proposed 346 spaces) is anticipated to occur at 7:00 PM during a weekend day.

As a result, the overall peak shared parking demand for Planning Areas 1 and 2 is forecast to be 337 parking spaces. Therefore, the proposed 346 parking spaces would be able to accommodate the peak parking need of Planning Areas 1 and 2, with surpluses of 9 parking spaces during the weekday and 35 parking spaces during the weekend. Therefore, impacts related to parking capacity with implementation of the proposed development would be less than significant.

Table 5.13-17: Weekend Shared Parking Demand Analysis

Land Use	Residential (One- Bedroom)	Residential (Two- Bedroom)	Residential (Three-/Four- Bedroom)	Office	Coffee Shop	Total Parking Demand	Surplus
Size	14 DU	24 DU	94 DU	11.1 KSF	1.0 KSF		
Peak Pkg Rate	1.05 /DU	1.80 /DU	2.65 /DU	4.0 /KSF	5.0 /KSF		
Weekend Pkg Rate]	1.05 /DU	1.80 /DU	2.65 /DU	0.4 /KSF	5.0 /KSF		
Time of Day	Parking Demand	Parking Demand	Parking Demand	Parking Demand	Parking Demand	Total Parking Demand	Surplus
6:00 AM	13	39	235	0	0		
7:00 AM	13	40	238	1	1	293	53
8:00 AM	13	40	238	2	2	295	51
9:00 AM	13	40	238	3	2	296	50
10:00 AM	13	40	238	4	3	298	48
11:00 AM	13	40	238	4	4	299	47
12:00 PM	13	40	238	4	5	300	46
1:00 PM	13	40	238	3	5	299	47
2:00 PM	13	40	238	2	5	298	48
3:00 PM	13	40	238	2	3	296	50
4:00 PM	13	40	238	1	3	295	51
5:00 PM	14	41	241	0	3	299	47
6:00 PM	14	41	243	0	4	302	44
7:00 PM	15	43	249	0	4	311	35
8:00 PM	15	43	249	0	3	310	36
9:00 PM	15	43	249	0	1	308	38
10:00 PM	15	43	249	0	1	308	38
11:00 PM	15	42	246	0	0	303	43
12:00 AM	14	41	242	0	0	297	49

Source: TIS, Appendix L.

IMPACT TR-2: THE PROJECT WOULD NOT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B).

Less than Significant Impact. As described previously, CEQA Guidelines Section 15064.3(b) focuses on determining the significance of VMT related transportation impacts. Also, the City of Covina recently adopted Resolution CC 2020-56 regarding VMT thresholds of significance, which are consistent with OPRs screening criteria. These adopted criteria indicate that development projects that are located within 0.5 mile of either an existing major transit stop¹ or a stop along an existing high quality transit corridor² would result in a less than significant transportation impact as long as the 1) project has a FAR above 0.75; 2) does not include parking beyond City requirements; and 3) is consistent with the regional Sustainable Communities Strategy.

¹ Pub. Resources Code 21064.3: Major transit stop means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

² Pub. Resources Code 21155: A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

As shown on Figure 5.13-2, the Project is located within the Transit Priority Area; and as shown in Table 5.13-18, the combined total floor area ratio for the proposed Project development is 1.04, which is well over 0.75.

Table 5.13-18: Proposed Specific Plan Floor Area Ratio

Planning Area	Acreage	Square Footage	Proposed Building Area	FAR
PA 1	0.96	41,817.60	12,000	0.29
PA 2	4.54	197,762.40	236,905	1.20
Total	5.50	239,580	248,905	1.04

Second, the proposed Project does not propose more parking for use by residents, customers, or employees than required by the City of Covina). As described previously, the proposed development includes 346 vehicular parking spaces (including 37 on-street diagonal spaces along the west side of Rimsdale Avenue), which is less than that required application of the City of Covina Municipal Code (i.e., 465 spaces).

Additionally, the proposed Project is consistent with the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The proposed Project would support the 2016 RTPSCS's overall land use pattern of reinforcing the trend of locating new housing and employment in High Quality Transit Areas (HQTAs) with the intention of reducing VMT and greenhouses gases. The proposed Project would also help increase the share of total trips that use transit. As listed previously in Table 5.13-3, extensive transit service is currently provided in the vicinity of the Project site that is provided by the Foothill Transit Authority, the City of West Covina transit system, and Metrolink. The Foothill Transit Authority Line 190 has a stop located on the north and south sides of San Bernardino Road, just east of Rimsdale Avenue. Similarly, Line 280 has a stop located on the east and west sides of Azusa Avenue at San Bernardino Road, which is also less than 0.5-mile northeast of the Project. During the weekday AM and PM peak hours, Foothill Transit Lines 190 and 280 provide headways of approximately 15 minutes in the eastbound and westbound directions along San Bernardino Road and in the northbound and southbound directions along Azusa Avenue, respectively.

Therefore, according to the adopted criteria, the proposed Project would result in a less than significant VMT impact because the Project site is located within a high quality transit corridor, would result in a FAR higher than 0.75, does not include parking beyond City requirements; and is consistent with the regional Sustainable Communities Strategy. Overall, impacts related to VMT from implementation of the proposed Project would be less than significant.

IMPACT TR-3: THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT).

Less than Significant Impact. The proposed Project includes development of residential and commercial/office uses; both of which are community type uses, and does not include any incompatible uses, such as farm equipment. Planning Areas 1 and 2 would be accessed from would be provided via five driveways: one driveway on W. San Bernardino Road, three driveways on N. Rimsdale Avenue, and one driveway on W. Badillo Street that would provide direct access to parking areas. In addition, the Project proposes partial encroachment on N. Rimsdale Avenue along the easterly property frontage for the addition of angled on-street parking spaces.

All of the proposed improvements would be required to be installed in conformance with City design standards. The City's construction permitting process includes review of site plans to ensure that no potentially hazardous transportation design features would be introduced. For example, sight distance at each driveway would be reviewed for conformance with City of Covina sight distance standards at the time of

permitting approvals for grading, landscape, onsite circulation construction. As a result, impacts related to vehicular circulation design features would be less than significant.

IMPACT TR-4: THE PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS.

Less than Significant Impact.

Construction

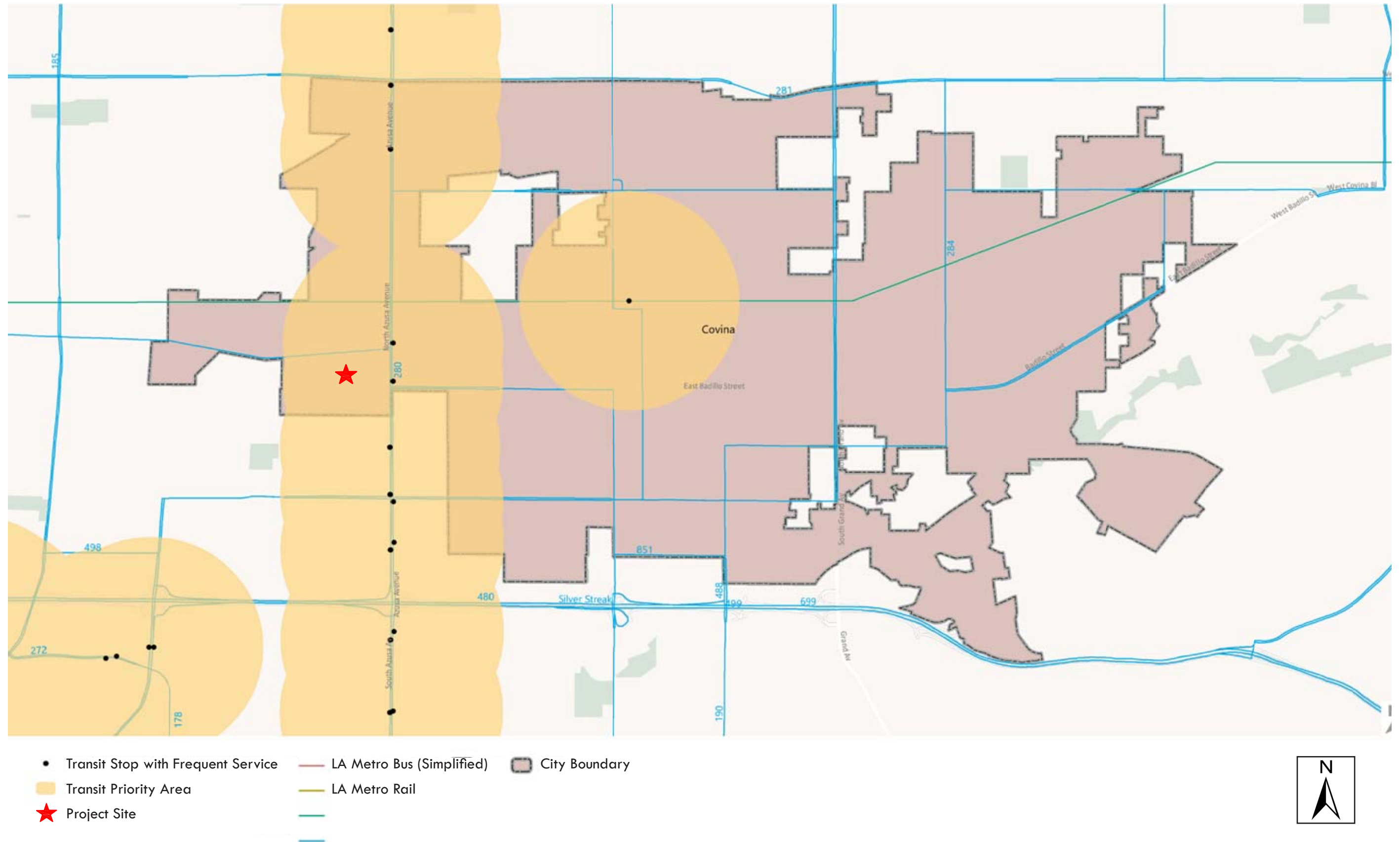
The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. The roadway improvement, included as Mitigation Measure TR-2, and installation of driveways that would be implemented during construction pursuant to the Project could require the temporary closure of travel lanes, but full roadway closure and traffic detours are not expected to be necessary. Additionally, construction activities would be required to implement measures to facilitate the passage of persons and vehicles through/around any required temporary road restrictions, and ensure the safety of passage in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9) and the City of Covina Fire Code included as Municipal Code Chapter 14.12, which would be ensured through the City's permitting process. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level.

Operation

As described previously, the Project includes five driveways: one driveway on W. San Bernardino Road, three driveways on N. Rimsdale Avenue, and one driveway on W. Badillo Street that would provide direct access to parking areas. In addition, the Project proposes partial encroachment on N. Rimsdale Avenue along the easterly property frontage for the addition of angled on-street parking spaces. As described previously, these driveways would provide adequate and safe circulation to and from the Project site and would provide a several routes for emergency responders to access different portions of the Project site and surrounding areas.

Additionally, during operation of the Project, building tenants would be required to maintain adequate emergency access for emergency vehicles as required and verified by the City and the Los Angeles County Fire Department (LACFD) through operational permitting and inspections. Because the Project would comply with all applicable City codes, as verified by the City and LACFD during permitting of the proposed development, potential impacts related to inadequate emergency access would be less than significant.

Transit Priority Areas



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5.13.7 CUMULATIVE IMPACTS

The cumulative traffic study area for the proposed Project includes the 13 intersections that are evaluated above. This includes portions of the Cities of Covina, West Covina, and County of Los Angeles. The traffic study area was selected based upon, local access to the Project site, the Project's trip generation, likely Project distribution patterns, a review of existing operations, and coordination with the Cities of Covina, West Covina, and County of Los Angeles traffic engineering staffs. The related projects within the cumulative study area for traffic are listed on Table 5.13-9 and shown on Figure 5-1. The proposed Project would add new vehicle trips to the cumulative geographic area. Because the development proposed within Planning Areas 1 and 2 has an opening year of 2024, the traffic analysis detailed above analyzed both Year 2024 and Year 2040 traffic conditions, which took into account the cumulative projects, regional growth, and the potential maximum buildout of Planning Areas 3 and 4. As detailed previously, the proposed Project would result in impacts at one intersection in the cumulative 2040 condition with maximum buildout of all four Planning Areas. Mitigation Measure TR-2 has been identified, which would reduce impacts to a less than significant level. Therefore, the proposed Project would result in a less than cumulatively considerable impact related to traffic with implementation of mitigation.

In addition, as described previously, the Project would result in a less than significant impact related to VMT as the proposed Project is located within a high quality transit corridor, would result in a FAR higher than 0.75, does not include parking beyond City requirements; and is consistent with the regional Sustainable Communities Strategy. As the proposed Project meets both the OPR and the City's adopted VMT criteria, it would not result in impacts that could combine with impacts from other development projects that would be cumulatively considerable. Therefore, cumulative impacts related to VMT would be less than significant.

5.13.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

- SCAG 2016 - 2040 Regional Transportation Plan/Sustainable Communities Strategy
- City of Covina General Plan Circulation Element
- City of Covina Municipal Code

In addition, the following Plans, Programs, and Policies (PPP) are in the Covina Municipal Code that would reduce the potential for impacts to occur during implementation of the proposed Project will be included in the Project's mitigation monitoring and reporting program (MMRP):

PPP TR-1: Municipal Code Section 11.08.300 Permit work – Warning signs, lights and barricades requires that a project performing work which interferes with or endangers the safe movement of traffic shall have the work safeguarded by adequate warning signs, barricades, lights and devices. Project shall be responsible for placing and maintaining adequate warning signs, barricades, lights and devices during all periods during which traffic movement is interfered with or endangered in order to promote the safe movement of traffic, including but not limited to periods of twilight, nighttime, fog and/or rain. All warning signs, barriers, barricades, flags and other devices shall comply with or exceed the standards required in the Vehicle Code.

5.13.2 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impact TR-1 would be **potentially significant**.

Upon implementation of regulatory requirements, Impacts TR-2 through TR-4 would be less than significant.

5.13.10 MITIGATION MEASURES

Mitigation Measure TR-1: Construction Traffic Control Plan. Prior to issuance of a construction permits, a traffic control plan shall be submitted by the development applicant and approved by the City. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

Mitigation Measure TR-2: Azusa Avenue/Badillo Street (#9). Prior to issuance of certificates for occupancy for development within each Specific Plan Planning Area, a fair share payment based on each development's portion of impact shall be paid to implement the following improvement. The north and south legs of Azusa Street at the Badillo Street intersection shall be modified to provide a third through lane. The additional through lane shall be accommodated by narrowing of the median island, removal of dedicated right-turn lanes, new roadway striping, and removal of 5 existing curbside parking spaces along the west side of Azusa Avenue and 7 existing curbside parking spaces along the east side of Azusa Avenue, south of the intersection. The modified northbound and southbound approach lane configurations would consist of one left-turn lane, two through lanes, and one shared through/right-turn lane.

5.13.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

For Impact TR-1, Mitigation Measures TR-1 and TR-2 would reduce impacts to a less than significant level.

Impacts related Impacts TR-2 through TR-4 would be less than significant.

REFERENCES

Traffic Impact Study for the Covina Bowl Specific Plan Project. Prepared by Linscott Law & Greenspan (LL&G) Engineers. Appendix L.

Supplemental VMT Analysis for the Covina Bowl Specific Plan Project. Prepared by Linscott Law & Greenspan (LL&G) Engineers. Appendix L.

5.14 Tribal Cultural Resources

5.14.1 INTRODUCTION

This section addresses potential impacts to tribal cultural resources associated with implementation of the proposed Project. Information within this section is based upon data from the California Native American Heritage Commission (NAHC) Sacred Lands File search, Geotechnical Engineering Investigation (Geotechnical Report) that was prepared by GeoSoils Consultants Inc. (GEO 2017) (Appendix E), Phase I Environmental Site Assessment, prepared by ENGEO Incorporated (Phase I 2019), the Limited Phase II Environmental Site Assessment, prepared by ENGEO Incorporated (Phase II 2019) (Appendix G), the Covina Bowl Project Cultural Resource Survey that was prepared by JM Research & Consulting (CUL 2020), included as Appendix C, and Project-specific coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project region.

5.14.2 REGULATORY SETTING

California Senate Bill 18

Senate Bill 18 (SB 18) (California Government Code Section 65352.3) sets forth requirements for local governments to consult with California Native American tribes identified by the California Native American Heritage Commission (NAHC) to aid in the protection of tribal cultural resources. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning to protect, or mitigate impacts on, tribal cultural resources. The Tribal Consultation Guidelines: Supplement to General Plan Guidelines (OPR, 2005), identifies the following contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

Because the proposed Project includes a General Plan Amendment, it is subject to the statutory requirements of SB 18 Tribal Consultation Guidelines.

California Assembly Bill 52

Assembly Bill 52 (AB 52) established a requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Public Resources Code (PRC) Section 21074(a) defines "tribal cultural resources" (TCRs) as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are

either “[i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources” or “in a local register of historical resources.” Additionally, defined cultural landscapes, historical resources, and archaeological resources may be considered tribal cultural resources. PRC Section 21074(b), (c). The lead agency may also in its discretion treat a resource as a TCR if it is supported with substantial evidence.

Projects for which a notice of preparation for a Draft EIR was filed on or after July 1, 2015 are required to have lead agencies offer California Native American tribes traditionally and culturally affiliated with the project area consultation on CEQA documents prior to submitting an EIR in order to protect TCRs. PRC Section 21080.3.1(b) defines “consultation” as “the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement.” Consultation must “be conducted in a way that is mutually respectful of each party’s sovereignty [and] recognize the tribes’ potential needs for confidentiality with respect to places that have traditional tribal cultural significance.” The consultation process is outlined as follows:

1. California Native American tribes traditionally and culturally affiliated with the project area submit written requests to participate in consultations.
2. Lead agencies are required to provide formal notice to the California Native American tribes that requested to participate within 14 days of the lead agency’s determination that an application package is complete or decision to undertake a project.
3. California Native American tribes have 30 days from receipt of notification to request consultation on a project.
4. Lead agencies initiate consultations within 30 days of receiving a California Native American tribe’s request for consultation on a project.
5. Consultations are complete when the lead agencies and California Native tribes participating have agreed on measures to mitigate or avoid a significant impact on a TCR, or after a reasonable effort in good faith has been made and a party concludes that a mutual agreement cannot be reached (PRC Sections 21082.3(a), (b)(1)-(2); 21080.3.1(b)(1)).

AB 52 requires that the CEQA document disclose significant impacts on TCRs and discuss feasible alternatives or mitigation to avoid or lessen an impact.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

5.14.3 ENVIRONMENTAL SETTING

Native American Tribes

The Project site is located within the ethnographic territory of the Gabrielino or Tongva Indians. The Gabrielino are Takic-speakers and descended from Late Prehistoric populations of the region. The name Gabrielino was given to the local inhabitants by Spanish Missionaries who established a mission in Gabrieleno territory in 1771.

The territory of the Gabrieleño at the time of Spanish contact covered much of current-day Los Angeles, San Bernardino, and Orange Counties. The southern region of this cultural area is bound by Aliso Creek, the eastern region is located east of San Bernardino along the Santa Ana River, the northern region includes the San Fernando Valley, and the western region includes portions of the Santa Monica Mountains. The Gabrieleño also occupied several Channel Islands including Santa Barbara Island, Santa Catalina Island, San Nicholas Island, and San Clemente Island. Because of their access to certain resources, including a steatite source from Santa Catalina Island, this group was among the wealthiest and most populous aboriginal groups in southern California. Trade of materials and resources controlled by the Gabrieleño extended as far north as the San Joaquin Valley, as far east as the Colorado River, and as far south as Baja California.

Major Gabrielino villages or communities near the Project site included Ashuukshanga to the north and Weniinga to the south. Weniinga was located within what is now the City of Covina. The word Weniinga means “one of the places where metates, etc., or anything is discarded as about an Indian camp”.

Rivers and streams were used as trading routes and travel routes as they provided resources. Thus, many tribal cultural resources are found along rivers, streams, and other known travel or trade routes. The Project site does not include, and is not located near a river, stream, or identified corridor that could have been a travel or trade route.

Project Site Ground Disturbances

The Phase I Environmental Site Assessment that was prepared for Planning Areas 1 and 2 (Phase I 2019) describes the existing buildings were developed in the 1950s. In addition, a review of historical records indicates that a former railroad line was adjacent to the southern boundary of the Project site until circa 1950, and an orchard was onsite between approximately 1928 and circa 1960, which resulted in shallow soil disturbances.

5.14.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
- 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, that considers the significance of the resource to a California Native American tribe.

5.14.5 METHODOLOGY

A Sacred Lands File search was requested from the NAHC in November 2019. The NAHC responded on November 12, 2019, stating that there are no known/known sacred lands within 0.5 mile of the Project site, and requested that 5 Native American individuals be contacted for further information regarding the general area vicinity.

In compliance with SB 18, AB 52, and the NAHC request, on January 22, 2020, the City sent letters to the following Native American tribes that may have knowledge regarding tribal cultural resources in the vicinity of the Project area.

- Gabrieliño-Tongva Nation

- Gabrieliño-Tongva Tribe
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrieleño/Tongva Indians of California Tribal Council

One response was received. Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation, responded on January 29, 2020. A consultation via conference call occurred between a City representative and Mr. Salas occurred on February 2, 2020 during which the history of uses and development of the Project site and the depth of previous and existing infrastructure on the site was discussed. During the SB 18/AB 52 consultation, the Gabrieleño Band of Mission Indians – Kizh Nation stated that the Project lies within its ancestral tribal territory but not within a potentially sensitive area. Mr. Salas did not provide any specific information or substantial evidence indicating that potential Tribal Cultural Resources could be located within the Project site. Mitigation was requested to provide for Native American resource sensitivity training and to prescribe activities should any inadvertent discoveries of tribal cultural resources be unearthed by construction activities and the consultation concluded.

5.14.6 ENVIRONMENTAL IMPACTS

IMPACT TCR-1: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE THAT IS LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K).

Less than Significant Impact. SB 18 and AB 52 require meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on TCRs. As described above, TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (PRC Section 21074). As outlined above, the City sent letters to 5 Native American representatives, notifying them of the proposed Project in accordance with SB 18 and AB 52. The City received one request to consult from the Gabrieleño Band of Mission Indians – Kizh Nation and a consultation was scheduled.

Additionally, no information regarding potential impacts on TCRs was submitted and no sites were documented in NAHC's Sacred Lands File search conducted for the USGS quadrangle that encompasses the Plan Area. Finally, no substantial evidence was received as part of the Cultural Resources Survey (Appendix C herein). Therefore, impacts to TCRs are not anticipated to be significant as a result of implementation of the Project.

IMPACT TCR-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF 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 THE PUBLIC RESOURCES CODE SECTION 5024.1, THAT CONSIDERS THE SIGNIFICANCE OF THE RESOURCES TO A CALIFORNIA NATIVE AMERICAN TRIBE.

Less than Significant Impact with Mitigation Incorporated. As described in the previous response, the Project site has been previously disturbed. The proposed construction involves excavation; however, as discussed in Impact TCR-1 above, no substantial evidence exists that TCRs are present in the Project site. Although, no TCRs have been identified, during the SB 18/AB 52 consultation, the Gabrieleño Band of Mission Indians – Kizh Nation stated that the Project lies within its ancestral tribal territory but not within a potentially sensitive area. Mitigation Measure TCR-1 has been included to provide for Native American

resource sensitivity training, and to prescribe activities should any inadvertent discoveries of tribal cultural resources be unearthed by construction activities.

Additionally, as described previously, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the Project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, with implementation of Mitigation Measure TCR-1 and the existing regulations, impacts to TCRs would be less than significant.

5.14.7 CUMULATIVE IMPACTS

The cumulative study area for tribal cultural resources includes the southern California region, which contains the same general tribal historic setting of the Gabrieleño, as detailed previously in Section 5.14.3, *Environmental Setting*. Other projects in the vicinity of the Project site would involve ground disturbances that could reveal buried TCRs.

Cumulative impacts to TCRs would be reduced by compliance with applicable regulations and consultations required by SB 18 and AB 52. As described above, the Project site and vicinity is not known to contain TCRs; however, Mitigation Measure TCR-1 would be implemented to ensure that impacts would not occur in the case of an inadvertent discovery of a potential TCR. This mitigation measure would provide that the Project would not contribute to a cumulative loss of TCRs. Therefore, cumulatively impacts would be less than significant.

5.14.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

- California Government Code Sections 5097.9-5097.99
- California Health and Safety Code Section 7050.5
- California Public Resources Code Sections 21073 et seq. (AB 52)

5.14.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact TCR-1 would be less than significant.

Without mitigation, Impact TCR-2 would be **potentially significant**:

5.14.10 MITIGATION MEASURES

Mitigation Measure TCR-1: Native American Sensitivity Training and Inadvertent Discoveries. Prior to the issuance of any permits for initial site clearing (such as pavement removal, grubbing, tree removals) or issuance of permits allowing ground-disturbing activities (including as boring, grading, excavation, drilling, potholing or auguring, and trenching), the City of Covina shall ensure that the project applicant/developer retain qualified Native American Monitor(s) to provide Native American Indian Sensitivity Training for construction personnel and to provide for on-call monitoring services in the event of an inadvertent discovery of a potential tribal cultural resource. The monitor(s) shall be approved by the tribal representatives of the Gabrieleno Band of Mission Indians - Kizh Nation. The monitor shall conduct a Native American Indian Sensitivity Training for construction personnel. The training session includes a handout and focus on how to

identify Native American resources encountered during earthmoving activities and the procedures followed if resources are discovered.

In the event that tribal cultural resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can also be evaluated by a Native American monitor in cooperation with a qualified archaeologist to determine if the potential resource meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique resource (Public Resources Code 21083.2(g)). Construction activities could continue in other areas. If the find is considered an "archeological resource" the Native American monitor in cooperation with the archaeologist, shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4. If unique a tribal cultural resource cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the project applicant's/developer's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation in an established accredited professional repository.

5.14.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The mitigation measure and existing regulatory programs described previously would reduce potential impacts associated with TCRs for Impact TCR-2 to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to TCRs would occur.

REFERENCES

Bean, Lowell John and Charles R Smith. 1978 Gabrielino IN *Handbook of North American Indians, California*, edited by R.F. Heizer, Smithsonian Institution Press, Washington D.C., pp 538-549.

Covina Bowl Project Cultural Resources Survey. May 2020 (CUL 2020). Prepared by JM Research & Consulting.

Geotechnical Engineering Investigation (Geotechnical Report). Prepared by GeoSoils Consultants, Inc. (GEO 2017).

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Limited Phase II Environmental Site Assessment Report, 2019. Prepared by ENGEO Incorporated (Phase II 2019).

5.15 Mandatory Findings of Significance

5.15.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” Potential environmental effects of the proposed Project and mitigation measures are discussed in detail throughout Chapter 5 of this EIR.

Historic Resources

As detailed, in Section 5.3, *Cultural Resources*, the Covina Bowl building is eligible for listing in the National Register, is listed in the California Register of Historical Resources (CRHR) and is eligible for designation as a City Landmark. The National Register’s eligibility and listing in the CRHR is based on the Covina Bowl’s ability to exemplify the Googie style of roadside commercial architecture (a bowling center), as designed by the architectural firm Powers, Daly, and DeRosa.

The proposed Project includes demolition of the rear, west mass that contained the bowling lanes. This would historically materially impair the Covina Bowl building. Although the building would continue to exhibit character-defining features of the Googie style and, though lessened, roadside commercial architecture, it would result in a substantial change. Therefore, implementation of the proposed Project would result in a substantial adverse change in the significance of the Covina Bowl (a historic resource) and a significant impact would occur.

Mitigation Measures CUL-1 through CUL-5, which would provide a high quality digital scans of Covina Bowl original construction plan set (1955), implement an interpretative program regarding the history and significance of the Covina Bowl, and submit a nomination application to designate the Covina Bowl as a City Landmark, have been included to reduce historic impacts to the extent feasible. However, demolition of the rear west mass would continue to result in a substantial adverse effect on the National Register eligible and CRHR listed historic resource, and impacts would remain significant and unavoidable after implementation of mitigation.

Cumulative Historic Resources

Because all historical resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. Federal, state, and local laws and regulations protect historic resources when feasible. However, it is not always feasible to protect historic resources. As described previously, the Covina Bowl is eligible for the National Register, is listed in the CRHR, and is eligible for local designation under Chapter 17.81 of the Covina Municipal Code. Because the Covina Bowl is considered a state historic resource and eligible for listing as a national and local historic resource, the cumulative study area for historic resources includes the City of Covina, State of California, and United States.

As described previously, the proposed Project includes demolition of the rear (west) mass of the Covina Bowl building that previously contained the bowling lanes, which would result in a direct impact to a historic resource. As a result, Mitigation Measures CUL-1 through CUL-3 are included to reduce impacts. However, demolition of an essential part of an historic resource causing a substantial adverse change in the significance of the resource, cannot be mitigated to a less-than-significant level; and the loss of the historic resource would result in a cumulatively considerable impact to historic resources.

5.15.2 GROWTH INDUCEMENT

This section analyzes the growth inducement potential of the proposed Project and the associated secondary effects of growth the Project might permit. As required by CEQA Guidelines Section 15126.2(d), an EIR must:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a recycled water plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Thus, based on CEQA, a project could have a direct effect on population growth, for example, if it would involve construction of substantial new housing. A project could also have indirect growth-inducement potential if it would:

- Establish substantial new permanent employment opportunities (e.g., commercial, industrial, governmental, or other employment-generating enterprises) or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities;
- Remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or would add substantial capacity that could accommodate additional unplanned growth;
- Remove obstacles to growth through changes in existing regulations pertaining to land development;
- Result in the need to expand one or more public service facilities to maintain desired levels of service; or
- Involve some other action that could encourage and facilitate other activities that could significantly affect the environment.

As CEQA Guidelines Section 15126.2(d) states that growth-inducing effects are not to be construed as necessarily beneficial, detrimental or of little significance to the environment; the following information is provided as additional information on ways in which the proposed Project could contribute to significant changes in the environment beyond the direct consequences of developing the land use concepts examined in the preceding sections of this EIR.

Establish substantial new permanent employment opportunities or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities

The Project site is currently developed with 31 multi-family residential units, the Covina Bowl building, vacant single-story retail uses, a day care, and a church. The proposed Project would result in an increase of approximately 12,000 square feet of commercial/office uses and 132 additional residential units within Planning Areas 1 and 2. In addition, buildout of Planning Areas 3 and 4 by 2040 would result in development

of 4,175 square-feet of retail space or 11 multi-family residential units in Planning Area 3 and 37,244 square feet of retail space or 52 multi-family residential units. If all of Planning Areas 3 and 4 were redeveloped with multi-family residences, approximately 173 residents would result. As detailed in the Population and Housing discussion below, this is anticipated to generate approximately 536 new residents that would be 1.04 percent of the City's forecasted population in 2040 and approximately 1.10 percent of the City's forecasted household growth in 2040. In addition, the potential buildout of Planning Areas 3 and 4 by year 2040 would generate 173 residents if all developed with residential. However, as the development included in the Project would consist of a limited portion of the forecasted growth, the proposed Project would not result in induced unplanned residential growth.

In addition, the 12,000 square feet of commercial/office uses in Planning Area 1 and up to 41,419 square feet of potential new commercial/office uses within Planning Areas 3 and 4 by year 2040 would be provided within a developed area and the 113 new jobs that would be created by this development would provide new employment opportunities to employees that are already living in Covina and the surrounding cities. Most of the new jobs that would be created by the proposed Project would be commercial/office and residential management/maintenance positions that do not require a specialized workforce. Thus, it is anticipated that these jobs would be filled by people who would already be living within Covina and surrounding communities and would not induce an unanticipated influx of new labor into the region. Thus, impacts related to increased growth through the provision of employment opportunities would be less than significant.

Overall, the Project site has historically provided both housing and employment opportunities and provided for economic activity. The proposed Project would provide for adaptive reuse of a currently developed area to provide for additional economic activities that are consistent with the current development. Also, as the Project includes development of 132 multi-family units in Planning Areas 1 and 2 and up to 63 multi-family residential units in Planning Areas 3 and 4, the Project provides housing and would not result in the need for additional housing. Therefore, the economic effects of the proposed Project would not result in the need for additional development to support the Project and would not result in a substantial impact the environment.

Remove Obstacles to Growth, e.g., Through the Construction Or Extension of Major Infrastructure Facilities that do not Presently Exist in the Project Area or Would Add Substantial Capacity that Could Accommodate Additional Unplanned Growth.

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable or to expand the development potential of redevelopment areas.

The proposed Project would install new onsite infrastructure to serve the proposed multi-family residential and commercial/office uses that would connect to the existing water, sewer, and drainage infrastructure in the W. Badillo Street and N. Rimsdale Avenue right-of-ways that currently serve the Project site. The new onsite water system would convey water supplies to the proposed buildings and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water.

The onsite infrastructure would not provide additional capacity beyond what is needed to serve the Project site. In addition, because the Project is within a developed area that is receiving services from existing infrastructure and would connect to the existing infrastructure, development of the proposed Project would not result in an expansion of overall capacity, extension of infrastructure, or provision of services in areas or

an unserved area. Therefore, infrastructure improvements would not result in significant growth inducing impacts.

Remove Obstacles to Growth Through Changes in Existing Regulations Pertaining to Land Development

The Project provides for adaptive reuse of a currently developed site that has General Plan land use designations of General Commercial and High Density Residential and zoning designations of Regional or Community Shopping Center (C-3A), Multiple Family (RD), and Administrative and Professional Office (C-P). A project could directly induce growth if it would remove barriers to population growth such as change to a jurisdiction's general plan and zoning code, which allows new development to occur in underutilized areas.

The proposed Project includes amendments to the General Plan and to the zoning code to allow for the adaptive reuse of the site. The Project proposes a General Plan land use designation amendment from General Commercial and High Density Residential to Specific Plan (SP), which would allow specific development requirements for the proposed mixed uses. In addition, the Project includes a proposed zoning change to Specific Plan (SP), which would also provide specific development regulations for the mixed-use development.

The proposed Project would reuse an already developed area that is surrounded by urban development. The proposed Project would involve a change to development regulations and would result in additional onsite residents and employees. However, the zoning and land use changes are parcel specific and would not result in growth outside of the Project site, because the areas are either completely developed or within development land use plans. Changes to the site's land use and zoning designations would not result in removing an obstacle to growth within the vicinity. In addition, the growth that would result from the proposed Project are within SCAG's projections (detailed below). Therefore, impacts related to growth from changes in existing regulations pertaining to land development would be less than significant.

Result in the Need to Expand One or More Public Service Facilities to Maintain Desired Levels of Service

The proposed Project is expected to incrementally increase the demand for fire protection and emergency response, police protection, and school services. However, as described in Section 5.11, *Public Services*, the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service. Based on service ratios and buildout projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

Involve Some Other Action that Could Encourage and Facilitate Other Activities that Could Significantly Affect the Environment

The proposed Project involves implementation of a Project that provides a change in development regulations that are specific to the allowable land uses on the site itself. The proposed Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The Project would comply with all applicable City plans, policies, and ordinances. In addition, Project features and mitigation measures have been identified within this EIR to ensure that the Project minimizes environmental impacts. The Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment. Therefore, impacts would be less than significant.

Environmental Impacts of Induced Growth

All physical environmental effects from construction or development of the proposed Project has been analyzed in all technical sections of this EIR. For example, activities such as excavation, grading, and construction as required for the proposed Project were analyzed in the Sections 5.2, *Air Quality*, 5.6, *Greenhouse Gas Emissions*, 5.10, *Noise*, and 5.13, *Transportation*. Therefore, construction of the proposed Project has been analyzed in this EIR and would be adequately mitigated either through implementation of existing regulations and/or mitigation measures contained within Chapter 5 of this EIR.

5.15.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.... Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” (CEQA Guidelines Section 15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The proposed Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project area that are currently developed with urban uses would be recommitted to multi-family residential and commercial/office uses. Secondary effects associated with this irreversible commitment of land resources include:
 - Changes in views associated with construction of the new buildings and associated development (see Section 5.1, *Aesthetics*).
 - Increased traffic on area roadways (see Section 5.13, *Transportation*).
 - Emissions of air pollutants associated with Project construction and operation (see Section 5.2, *Air Quality*).
 - Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, lighting, heating and cooling systems, appliances, etc. (see Section 5.4, *Energy*).
 - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.10, *Noise*).
- Construction of the proposed Project as described in Section 3.0, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the proposed Project, as demonstrated in the analyses contained in Section 5.4, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources,

and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-generating and conserving project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments.

5.15.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment”. However, CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The following environmental issue areas would not be potentially impacted by the proposed Project, as detailed below.

Agriculture and Forestry Resources

The Project site is developed for urban uses and located in an area that is completely developed for urban uses. The Project site is zoned for Regional or Community Shopping Center (C-3A) and Multiple Family (RD-1500), is not in a Williamson Act contract, and vicinity is void of agricultural uses. The California Department of Conservation Important Farmland mapping identifies the Project site as Urban and Built-Up land (CDC 2020). No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by the Project or converted to a non-agricultural use. In addition, the Project site and vicinity is void of forest land or timberland. As the Project site and vicinity do not include these resources, no other changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest/timberland land to non-forest or non-timberland use. Thus, impacts related to agriculture and forestry resources would not occur.

Biological Resources

The Project site is developed and located within an urbanized area. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on or adjacent to the site. Implementation of the Project would also not interfere with the movement of any native resident or migratory fish or wildlife species, with any established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. In addition, the Project site does not contain any natural lands that are subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, impacts related to biological resources would not occur from implementation of the proposed Project.

Mineral Resources

No active mining operations exist on or adjacent to the Project site. The mapping by the California Geological Survey does not indicate that any significant mineral deposits are present within the Project vicinity. The Project site is developed with urban uses and has no history of mining. Implementation of the Project would not cause the loss of availability of mineral resources valuable to the region or state, and no impact would occur.

Population and Housing

The Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy's (2016-2040 RTP/SCS) population and household growth forecast from 2012 through 2040 envisions a population of 11,514,800 within Los Angeles County in 2040, yielding an approximately 16 percent growth rate. The City of Covina is anticipated to have a population of 51,600 in 2040, yielding an approximately 7.1 percent growth rate. In addition, SCAG also develops socioeconomic estimates and growth projections for households. According to the 2016-2040 RTP/SCS household growth forecast, the City of Covina is anticipated to grow to 17,200 households by 2040.

Additionally, the Housing Element of the City's General Plan establishes a comprehensive policy and program framework for addressing existing and future housing related issues. The primary focus of the Housing Element is to protect the existing residential neighborhoods in Covina while, at the same time, ensuring that opportunities for new residential development are provided.

Using a 2.745 persons per housing unit multiplier, as noted in the City's General Plan, the new residential units as part of the proposed Project would result in an estimated increase in population of approximately 536 new residents with maximum residential development within Planning Areas 3 and 4. The proposed Project would represent approximately 1.04 percent of the City's forecasted population in 2040 and approximately 1.10 percent of the City's forecasted household growth in 2040. Thus, the proposed increase in housing units and population as a result of the proposed Project is within SCAG's 2016-2040 RTP/SCS growth forecast. Thus, substantial impacts related to direct growth would not occur.

Also, the proposed Project site is within an urbanized area of the City of Covina and is surrounded by commercial and residential uses. The proposed Project does not propose to expand surrounding utility infrastructure (e.g., water, electricity, cell tower, gas, sanitary sewer, and stormwater drains). All on-site systems are currently and would continue to be connected to existing infrastructure within adjacent roadways. Vehicular access would be provided by the existing roadways surrounding the Project site. Therefore, the proposed Project would not indirectly induce population growth through the extension of roads or other infrastructure. Thus, the Project would result in a less than significant impact related to inducement of substantial unplanned population growth.

Utilities and Service Systems

The proposed Project would install new water and sewer infrastructure on the site and connect to the existing water and sewer infrastructure in the adjacent roadways. New off-site water and wastewater infrastructure would not be required to be constructed and expanded off-site infrastructure would not be required to serve the proposed Project. Similarly, the existing landfills serving the Project region have the additional capacity to accommodate the Project.

Regarding water supply, the Initial Study (provided as Appendix A) details that the City's 2015 Urban Water Management Plan describes that in 2020 the City water production and demand is 5,705 acre-feet and is projected to increase to 5,940 acre-feet in 2040, which is an increase of 235 acre-feet. In addition, it assumes a water demand of 170 gallons per capita per day.

The proposed development within Planning Areas 1 and 2 would result in approximately 363 new residents and if all of Planning Areas 3 and 4 were redeveloped with multi-family residences, approximately 173 residents would result. This would total approximately 536 new residents at buildout of the Project site. Thus, the development would generate a demand of approximately 91,120 gallons of water per day or 102.07 acre-feet per year, which is within the 235-acre-foot anticipated increased demand and supply for water.

Additionally, this is a conservative estimate because the City's actual water use during FY 2014-15 was 163 gallons per capita per day, 7 gallons per day per capita less than the assumed demand rate. Redevelopment of the Project site would also be required to be compliant with CalGreen/Title 24 requirements for low-flow plumbing fixtures and irrigation, which would provide for efficient water use. Furthermore, the Urban Water Management Plan states the City has sufficient water supplies available to serve the Project site during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.

Wildfire

The Project site is located within an urban developed area and is not located within an identified wildland fire hazard area. As detailed in the Initial Study (provided as Appendix A), the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Adjacent areas to the Project site are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks and result in exposure of persons to pollutant concentrations from a wildfire. The Project does not include infrastructure that could exacerbate fire risks. In addition, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. Furthermore, the Project includes installation of onsite and off-site drainage facilities. Thus, the Project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires.

Implementation of the proposed Project would be required to adhere to the following chapters of the City's Municipal Code that would also reduce potential fire hazards: Chapter 14.04 California Building Code, Chapter 14.06 California Electric Code, and Chapter 14.12 California Fire Code. Therefore, the proposed Project would not result in impacts related to wildfires.

REFERENCES

California Department of Conservation Important Farmland mapping (CDC 2020). Accessed: <https://www.conservation.ca.gov/dlrp/fmmp>

California Geological Survey Mineral Resource mapping (CGS 2020). Accessed: <https://maps.conservation.ca.gov/mineralresources/#webmaps>

2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction. Accessed: https://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf

City of Covina General Plan Housing Element. 2010. Accessed: https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1073/final_housing_element_section_i_december_7_2010_.pdf

City of Covina Municipal Code. Accessed: <https://www.codepublishing.com/CA/Covina>

City of Covina 2015 Urban Water Management Plan. Accessed: https://covinaca.gov/sites/default/files/fileattachments/public_works/page/451/final_2015_uwmp_-_city_of_covina.pdf

6.0 Alternatives

This section addresses alternatives to the proposed Project and describes the rationale for including them in the EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

6.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Pursuant to *CEQA Guidelines* Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed project or to the project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed project's objectives. *CEQA Guidelines* Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, *CEQA Guidelines* Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to *CEQA Guidelines* Section 15126.6(d), discussion of each alternative presented in this EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (*CEQA Guidelines* Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (*CEQA Guidelines* Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed project;
- The extent to which the alternative could accomplish the objectives of the proposed project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed project and potential alternatives to it; and

- The requirement of the *CEQA Guidelines* to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (*CEQA Guidelines* Section 15126.6(e)).

Neither the CEQA statute, the *CEQA Guidelines*, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice” (*CEQA Guidelines* 15126(f)).

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures. The analysis in Chapter 5 of this EIR determined that impacts related to the following would remain significant and unavoidable.

Historic Resources

As detailed, in Section 5.3, *Cultural Resources*, the Covina Bowl building is eligible for listing in the National Register, is listed in the California Register of Historical Resources (CRHR) and is eligible for designation as a City Landmark. The National Register’s eligibility and listing in the CRHR is based on the Covina Bowl’s ability to exemplify the Googie style of roadside commercial architecture (a bowling center), as designed by the architectural firm Powers, Daly, and DeRosa.

The proposed Project includes demolition of the rear, west mass that contained the bowling lanes. This would historically materially impair the Covina Bowl building. Although the building would continue to exhibit character-defining features of the Googie style and, though lessened, roadside commercial architecture, it would result in a substantial change. Therefore, implementation of the proposed Project would result in a substantial adverse change in the significance of the Covina Bowl (a historic resource) and a significant impact would occur.

Mitigation Measures CUL-1 through CUL-5, which would provide a high quality digital scans of Covina Bowl original construction plan set (1955), implement an interpretative program regarding the history and significance of the Covina Bowl, and submit a nomination application to designate the Covina Bowl as a City Landmark, have been included to reduce historic impacts to the extent feasible. However, demolition of the rear west mass would continue to result in a substantial adverse effect on the National Register eligible and CRHR listed historic resource, and impacts would remain significant and unavoidable after implementation of mitigation.

Cumulative Historic Resources

Because all historical resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. Federal, state, and local laws and regulations protect historic resources when feasible. However, it is not always feasible to protect historic resources. As described previously, the Covina Bowl is eligible for the National Register, is listed in the CRHR, and is eligible for local designation under Chapter 17.81 of the Covina Municipal Code. Because the Covina Bowl is considered a

state historic resource and eligible for listing as a national and local historic resource, the cumulative study area for historic resources includes the City of Covina, State of California, and United States.

As described previously, the proposed Project includes demolition of the rear (west) mass of the Covina Bowl building that previously contained the bowling lanes, which would result in a direct impact to a historic resource. As a result, Mitigation Measures CUL-1 through CUL-5 are included to reduce impacts. However, demolition of an essential part of an historic resource causing a substantial adverse change in the significance of the resource, cannot be mitigated to a less-than-significant level; and the loss of the historic resource would result in a cumulatively considerable impact to historic resources.

6.3 PROJECT OBJECTIVES

The proposed Specific Plan Project has identified the following goals and objectives:

- Preserve the historic Covina Bowl through adaptive reuse;
- Provide new residential, commercial, and office development opportunities to revitalize the plan area;
- Eliminate split zoning across parcels and encouraging the planned development of the properties within the plan area that accommodate a range of land uses to meet evolving market demands;
- Provide a more flexible regulatory procedure by which the objectives of the City's General Plan and Zoning Code can be realized;
- Encourage creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of office, residential and commercial land uses and activities;
- Eliminate and prevent the spread of blight by revitalizing and rehabilitating vacant buildings;
- Strengthen the City's economic base by revitalizing the plan area to its full economic potential;
- Provide for-sale multifamily residential with a range of sizes to encourage first-time homebuyers;
- Ensure new residential development includes adequate open space and high quality recreational amenities for future residents;
- Bolster an economically vibrant and active walkable environment through introduction of mixed uses.
- Draw more patrons to surrounding commercial uses and expand walkability through enhanced pedestrian-oriented development within the plan area.
- Enhance the appearance of the community by redeveloping and upgrading the properties and street frontages within the Specific Plan area through creative site planning, high quality architecture, enhanced landscaping and lighting, while embracing the character of the historic Covina Bowl; and
- Transform street frontages and create neighborhood connectivity through pedestrian-oriented improvements and diagonal on-street parking spaces on N. Rimsdale Avenue.

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to *CEQA Guidelines* Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines* Section 15126.6(f), (f)(3)). This section identifies

alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

- **Alternate Site Alternative:** An alternate site for the proposed Specific Plan was eliminated from further consideration. The Specific Plan's focus is to provide adaptive reuse of the Covina Bowl building and provide infill development on the underutilized site. An alternative site would not include the existing Covina Bowl building; and thus, it is not feasible to change the site of the Project and meet the objectives of the Project. In addition, due to the urban and built out nature of the City, development of new multi-family residential units and commercial/office uses on another 7.5-acre site at a different location would likely require demolition of existing structures, and require similar mitigation for construction vibration, cumulative traffic, and tribal cultural resources. CEQA specifies that the key question regarding alternative site consideration is whether the basic project objectives would be attained and if any of the significant effects of the project would be avoided or substantially lessened by having the project at another location. Given the Project objective to adaptively reuse the Covina Bowl Building and the nature of the urban area, it would be infeasible to develop and operate the Project on an alternative site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.
- **Elimination of Mixed Use in Planning Areas 3 and 4:** The Project's buildout analysis for Planning Area 3 includes removal of the existing office space and development of a 4,175 square-foot retail space or 11 dwelling units, which would generate a maximum of 118 daily trips and 11 p.m. peak hour trips. The maximum potential buildout of Planning Area 4 under the proposed Project includes removal of the existing apartment building and restaurant and development of either 37,244 square feet of retail space or 52 dwelling units, which would generate a maximum of 716 daily trips and 83 p.m. peak hour trips. The maximum buildout of both Planning Areas 3 and 4 result in 834 daily trips, 94 of which occur in the p.m. peak hour. Eliminating the CBSP Mixed Use land use category for Planning Area 3 and 4, would result in fewer traffic, air quality, and GHG impacts because the existing apartment building would not redevelop with retail, and the existing restaurant would not redevelop with housing. However, Planning Area 4 is one parcel and is split with two different zones [Regional or Community Shopping Center (C-3A) and Multiple Family Residential Zone (RD)]. The purpose of the Specific Plan and CBSP Mixed Use is to eliminate the split zoning and allow all land uses across the entire parcel. Therefore, elimination of the CBSP Mixed Use land use category would defeat one of the basic purposes of the Specific Plan. Furthermore, it would not eliminate the Project's significant and unavoidable Historic Resources impact. Therefore, the Elimination of Mixed Use in Planning Areas 3 and 4 Alternative was rejected from further consideration.

6.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Two alternatives to the proposed Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the objectives of the Project, may avoid or substantially lessen any of the significant effects of the proposed Project, and are feasible from a development perspective. These alternatives have been developed based on the criteria identified in Section 6.1, and are described below:

Alternative 1: No Project/No Build. Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the EIR is required to "discuss the existing conditions at the time the notice of preparation is published, or if no notice

of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” In addition, Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Thus, under this alternative, the proposed Specific Plan would not be implemented, and no development would occur.

Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of implementing the proposed Project in contrast to the result from not approving, or denying, the proposed Project. This alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative. Under this alternative, no development would occur within the Project site and it would remain in its existing condition, which includes the Covina Bowl building, daycare building, church, 31-unit residential apartment complex (Continental Garden Apartments), and restaurant building (Mar Y Tierra).

As described in Section 4.0, *Existing Setting*, and 5.9, *Land Use and Planning*, the Covina Bowl building (69,138 square feet) and the daycare building (2,994 square feet) are currently vacant. The daycare building has several active code violations; and therefore, it could not be reoccupied by another daycare service provider. Also, the bowling center closed in 2017, the bowling lanes were removed, and the interior of the building has deteriorated. Due to the existing condition of the Covina Bowl building with the bowling lanes removed, lack of flooring in the bowling area, and the damaged bowling alley cantilevered ceiling of various heights, any new use of the building would require extensive rehabilitation pursuant to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, under the No Project/No Build Alternative, the daycare building, and the Covina Bowl building would remain vacant.

Alternative 2: Preservation of Entire Covina Bowl Building. Under this alternative, the Covina Bowl building would remain in its current condition to retain the historic structure's significance and the proposed residential development within Planning Areas 1 and 2 would be reduced. Due to the retention of the entire Covina Bowl building, the 65 multi-family residential units that were proposed in that portion of the site would not be developed by this alternative. This would result in a 49.2 percent reduction of residential units, or a maximum of 67 new units. Additionally, the 3,334 square foot lawn bowl area proposed to be located in the area of the rear, west mass of the Covina Bowl building, would not be provided under this alternative.

The remaining features of the proposed development would occur under this alternative, including the same rate of parking, type of architectural features, tot lot/playground, and barbeque open space area. Like the proposed Project, this alternative would require a General Plan Amendment from the existing land use designations of General Commercial and High Density Residential to Specific Plan (SP), and a zone change to designate the development portion of the site as a Specific Plan (SD).

6.6 ALTERNATIVE 1: NO PROJECT/NO BUILD

Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” In addition, Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Thus, under this alternative, the proposed Specific Plan Project would not be implemented, and no development would occur.

Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of implementing the proposed Project in contrast to the result from not approving, or denying, the proposed Project. This alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative. Under this alternative, no development would occur within the Project site and it would remain in its existing condition, which includes the Covina Bowl building, daycare building, church, 31-unit residential apartment complex (Continental Garden Apartments), and restaurant building (Mar Y Tierra).

As described in Section 4.0, *Existing Setting*, and 5.9, *Land Use and Planning*, the Covina Bowl building (69,138 square feet) and the daycare building (2,994 square feet) are currently vacant. The daycare building has several active code violations; and therefore, it could not be reoccupied by another daycare service provider. Also, the bowling center closed in 2017, the bowling lanes were removed, and the interior of the building has deteriorated. Due to the existing condition of the Covina Bowl building with the bowling lanes removed, lack of flooring in the bowling area, and the damaged bowling alley cantilevered ceiling of various heights, any new use of the building would require extensive rehabilitation pursuant to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, under the No Project/No Build Alternative, the daycare building, and the Covina Bowl building would remain vacant.

6.6.1 ENVIRONMENTAL IMPACTS

Aesthetics

The No Project/No Build Alternative would maintain the existing character of the Project site. As described in Section 5.1, *Aesthetics*, the site is developed with a vacant bowling center and commercial strip building, vacant daycare building, office building, church, restaurant, and 31-unit multi-family residential building. The existing structures include a total of approximately 77,953 square feet of non-residential uses and approximately 32,589 square feet of residential and retail uses, which include parking areas and vehicle circulation drives.

The existing vacant bowling center, vacant daycare, office, church, and restaurant are one-story in height, and the multi-family residential building is two-stories in height. The Project site includes ornamental trees scattered throughout the site, and street trees along W. Badillo Street, W. San Bernardino Road, and N. Rimsdale Avenue.

The exteriors of the buildings are distinguished by detailing around the entrances that include steel framed or wood framed doorways. The vacant daycare, office, and restaurant have a typical boxy modern office/retail structure appearance with distinguishable signage. The existing restaurant contains a large three-story sign with multiple smaller signs throughout and is a prominent feature to motorists along W. San Bernardino Road.

Under this alternative, the daycare and Covina Bowl buildings would remain vacant and no exterior aesthetic changes would occur. No new multi-family residential units would be developed on the site, and the existing Covina Bowl building and its 60-foot high neon sign identifying the site would remain in its current condition. Without adaptive reuse, the existing buildings would not improve the aesthetics or visual quality of the site.

In comparison to the proposed Project, the No Project/No Build Alternative would not increase the building density or change the character of the site with development of the three-story multi-family residential buildings. This alternative would not result in a change in the visual height, scale, and mass of the development on the site. However, the existing large surface parking lot would remain, the limited ornamental landscaping within the Project site and along the roadways would not be improved, historic rehabilitation of the Covina Bowl building would not be provided; and integrating the site with improvements that acknowledge the Covina Bowl Google architecture or bowling uses would not occur. Overall, the No Project/No Build

Alternative would not develop taller denser multi-family residential structures or a renovated Covina Bowl building on the site and views of the Project site would not change. In addition, lighting and glare would not increase and would remain the same as existing conditions.

Air Quality

The proposed Project would result in short-term construction-related emissions and long-term operational emissions that would be less than significant with implementation of existing regional regulations. The new residential and commercial/office uses on the site would generate emissions from vehicle trips and use of consumer products. Consumer products include cleaning supplies, kitchen aerosols, cosmetics, and toiletries.

The No Project/No Build Alternative would avoid short-term construction-related emissions and an increase in operational emissions would not occur. However, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to air quality.

Cultural Resources

As determined in Section 5.3, *Cultural Resources*, the Covina Bowl building is eligible for listing in the National Register, is listed in the California Register of Historical Resources (CRHR) and is eligible for designation as a City Landmark. The proposed Project includes demolition of the rear, west mass that contained the bowling lanes. This would historically materially impair the Covina Bowl building; and although mitigation is provided, impacts would remain significant and unavoidable.

The No Project/No Build Alternative no changes to the Covina Bowl building would occur. No new multi-family residential units would be developed on the site, and the existing 60-foot high neon sign identifying the site would remain in its existing condition. In addition, the rear, west mass that contained the bowling lanes would not be demolished under this alternative. Therefore, impacts related to historic resources under the No Project/No Build Alternative would not occur.

However, this alternative would not provide historic rehabilitation of the Covina Bowl building or integrate the site with improvements that acknowledge the historic Covina Bowl Googie architecture or previous bowling uses. Thus, the No Project/No Build Alternative would not result in impacts related to historic resources; however, rehabilitation of those resources would not occur.

Energy

The proposed Project would result in new residences and commercial/office buildings that would require energy supplies. Development pursuant to the Project would be developed in compliance with the Calgreen/Title 24 requirements related to energy and includes features to reduce energy consumptions, such as solar panels on the new residential buildings. As described in Section 5.4, *Energy*, the buildout of the proposed Project would not use large amounts of energy or fuel in a wasteful manner, and impacts would be less than significant.

The No Project/No Build Alternative would not generate an increase in electricity demand. However, it would also not provide upgraded energy efficient infrastructure, such as electrical, solar panels, plumbing, and water efficient irrigation. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to energy.

Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Build Alternative. Therefore, there would be no potential for additional workers, building and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project

site. However, the Project impacts related to geology and soils were determined to be less than significant with compliance with the California Building Code (CBC). Therefore, the geologic hazard impacts from this alternative would be less than significant, and neutral in comparison to the proposed Project.

In addition, because the No Project/No Build Alternative does not involve grading or other ground disturbance activities, potential impacts to paleontological resources would not occur. Thus, impacts under this alternative would be reduced compared to the less than significant impacts of the proposed Project.

Greenhouse Gas Emissions

As described in Section 5.6, *Greenhouse Gas Emissions*, the proposed Project would result would generate approximately 1,690.36 MTCO₂e per year, which would be less than the threshold of 3,000 MTCO₂e/yr. Therefore, impacts related to GHG emissions would be less than significant. In addition, the proposed Project consists of infill redevelopment that has the potential to reduce GHG emissions from the reduction of Vehicle Miles Traveled (VMT) and installation of solar panels and other CALGreen Building (Title 24) requirements that are included in the City's Municipal Code Section 14.02.010(N). The proposed Project provides for pedestrian infrastructure, such as sidewalks that connect to off-site sidewalks to promote non-vehicular transportation and reduce VMT and related GHG emissions. In addition, the Project site is adjacent to existing bus routes and bicycle lanes. Providing a mixed-use development in such a location is consistent with the intent of the AB 32 Scoping Plan, SB 375, CARB Scoping Plan recommendations. Thus, impacts related to conflict with any applicable plan, policy, or regulation that was adopted for the purpose of reducing GHGs would be less than significant.

The No Project/No Build Alternative would avoid the short-term construction-related emissions and an increase in operational GHG emissions would not occur because no new residential or increased commercial/office square footage would be developed. However, the site would not be improved to provide solar panels and other energy efficient CALGreen Building (Title 24) infrastructure. Overall, the No Project/No Build Alternative would result in less GHG emissions in comparison to the proposed Project but would also result in a less than significant impact.

Hazards and Hazardous Materials

The proposed Project would remove asbestos-containing materials and lead-based paint prior to demolition or renovation of the existing buildings pursuant to existing requirements that protect human health and the environment from hazards associated with exposure to lead based materials and airborne asbestos fibers. Compliance with these existing regulations, as ensured through the permitting process and included as PPP HAZ-1 and PPP HAZ-2, would reduce potential impacts to a less than significant level.

The No Project/No Build Alternative would not include major construction activities and any existing asbestos or lead based paint would remain in place. Thus, potential impacts related to removal and disposal of asbestos and lead based materials would be avoided by this alternative; however, the asbestos and lead based materials would remain on the Project site. Overall, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts with implementation of existing regulations, as applicable.

Hydrology and Water Quality

Existing water quality conditions, drainage patterns, and runoff water amounts would remain "as is" under the No Project/No Build Alternative because no new development would occur. This alternative would not introduce new sources of water pollutants from either construction or new operations on the site, because no new development or different uses would occur. However, this alternative would not include installation of new low-impact development (LID), source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution, which would occur under the proposed Project. The

storm water leaving the site would not be filtered and would continue to contain sediment and other potential pollutants associated with the existing conditions of the site.

In addition, as detailed in Section 5.8, *Hydrology and Water Quality*, the proposed development in Planning Areas 1 and 2 would result in a 8 percent reduction of impervious surfaces that would result in a decrease in runoff compared to the existing condition. Therefore, the No Project/No Build Alternative would reduce potential pollutant related impacts to hydrology and water quality that would occur from the proposed Project. However, the beneficial improvements would not occur. Overall, hydrology and water quality impacts of the No Project/No Build Alternative would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

The Project site has existing General Plan Land Use designations of General Commercial (1.5 FAR) and High Density Residential (14.1 to 22 dwelling units per acre). The site is currently zoned as Regional or Community Shopping Center (C-3A), Multiple Family (RD), and Administrative and Professional Office (C-P). A General Plan Land Use amendment and zone change included in the proposed Project to provide development flexibility and standards specifically related to the historic Covina Bowl building.

Redevelopment of the site for additional multi-family residential and commercial/offices uses would integrate into the existing uses on the site. The Project would provide for more housing and commercial/office services for residents and employees in the City. The proposed land use and zoning designation changes to Specific Plan (SP) would not conflict with a policy or plan adopted for the purpose of avoiding or mitigating an environmental effect.

The No Project/No Build Alternative would result in continuation of the existing uses within the Project site. Thus, this alternative would not require a General Plan Amendment or zoning change, as no new development adjacent to the Covina Bowl building would occur. No impacts related to land use and planning would occur by retention of the existing onsite uses. Therefore, impacts related to land use and planning from implementation of the No Project/No Build Alternative would be less than significant, which is the same as the proposed Project.

Noise

As detailed in Section 5.10, *Noise*, the proposed Project would result a short-term increase in noise from construction and a long-term increase in noise from operation. The short-term construction noise would be less than significant; and operation of the proposed Project would also result in less than significant impacts. However, construction related demolition, excavation, and grading activities could impact nearby residential sensitive receptors. Therefore, Mitigation Measure NOI-1 is required to implement a 90-foot buffer zone to restrict the use of large loaded trucks, heavy mobile equipment greater than 80,000 pounds, and jack hammers within 90-feet of the occupied sensitive receptor locations.

The No Project/No Build Alternative would not generate an increase in vehicular trips; hence, traffic and operational noise under this alternative would be less than the proposed Project. Also, this alternative would not involve exterior construction related noise and vibration, and mitigation would not be required. As a result, the No Project/No Build Alternative would avoid potential impacts related to vibration; however, like the proposed Project, the noise generated under this alternative would be less than significant.

Public Services

The proposed Project would provide infill redevelopment of the site that would result in development of 132 multi-family residences and 12,000 square feet of commercial/office uses in the short-term and additional development of mixed-uses by the year 2040, which would require additional public services, such as fire

protection and emergency response, police protection, and schools. However, as described in Section 5.11, *Public Services*, there are existing adequate public service facilities that would be able to meet the service demands of the proposed Project and new or physically altered public service facilities would not be required.

The No Project/No Build Alternative would result in reoccupation of the existing vacant buildings and continuation of the existing uses within the Project site. Similar to the proposed Project, the employees onsite would require public services. However, the service demand would not increase; particularly because a new 24-hour resident population associated with the proposed multi-family residences would not exist. However, impacts from both the proposed Project and the No Project/No Build Alternative related to public services would be less than significant.

Parks and Recreation

As described previously, would provide infill redevelopment of the site that would result in development of 132 multi-family residences and 12,000 square feet of commercial/office uses in the short-term and additional development of mixed-uses by the year 2040, which would result in an increased demand for park and recreation facilities. However, as described in Section 3.0, *Project Description*, and shown in Figure 3-4, the proposed Project includes 5,024 square feet of open space and recreation area for residents. Based on the existing amount of 63.5 acres of existing park and recreation facilities within 3 miles of the Project site, the recreation facilities that would be provided as part of the Project, and the number of residents that would be generated, impacts related to parks and recreation would be in less than significant.

The No Project/No Build Alternative would continue the existing uses within the Project site, and an increase in demand for park and recreation facilities would not occur. Therefore, both the proposed Project and the No Project/No Build Alternative would result in less than significant impacts related to parks and recreation.

Transportation

As described in Section 5.13, *Transportation*, the proposed Project would result in an increase of 133 a.m. peak hour trips and 97 p.m. peak hour trips. The addition of these vehicle trips would result in an impact at Intersection No. 9: Azusa Avenue/Badillo Street, in the p.m. peak hour year 2040 cumulative condition. As detailed in Table 5.13-12, the buildout of the Specific Plan in 2040 would result in a limited increase in delay of 0.015 at the intersection that would operate at an LOS E with a delay of 0.946 in 2040 without the Project. This increase in delay would exceed the threshold for intersections operating at an LOS of E and implementation of mitigation would be required provide a third through lane at the intersection. This improvement would reduce the delay to 0.847 with an acceptable LOS of D.

Although, the No Project/No Build Alternative would result in a less than significant impact because no roadway improvements would be required to continue the existing uses on the site. The intersection of Azusa Avenue/Badillo Street would operate at an unacceptable LOS of E in the p.m. peak hour with a delay of 0.946 in 2040. Thus, the proposed Project and required mitigation would provide improved operations at Intersection No. 9: Azusa Avenue/Badillo Street in the p.m. peak hour, which would not occur under the No Project/No Build Alternative.

Tribal Cultural Resources

The proposed Project involves construction that could result in inadvertent impacts to unknown buried tribal cultural resources. Therefore, implementation of the proposed Project requires mitigation to reduce the potential impacts to these resources that could occur during construction. However, the No Project/No Build Alternative would not involve ground disturbance; no excavation or grading would occur. Hence, this alternative would not have the potential to impact unknown buried tribal cultural resources and mitigation is

not required. Thus, potential impacts to tribal cultural resources by the No Project/No Build Alternative would be less than the proposed Project.

6.6.2 CONCLUSION

Ability to Reduce Impacts

The No Project/No Build Alternative would result in continuation of the existing uses within the Project site, and infill development of the Project site and adaptive reuse of the Covina Bowl building, including demolition of the rear, west mass that contained the bowling lanes, would not occur. As a result, the No Project/No Build Alternative would avoid the significant and unavoidable historic resources impacts that would occur from the proposed Project. Additionally, impacts would be reduced and the mitigation measures that are identified in Chapter 5.0 of this EIR would not be required, which include measures related to historic resources, construction vibration, transportation, and tribal cultural resources.

However, the environmental benefits of the proposed Project would also not be realized; improvements at the intersection of Azusa Avenue/Badillo Street would not occur, the limited ornamental landscaping within the Project site and along the roadways would not be improved, historic rehabilitation of the Covina Bowl building would not be provided; and integrating the site with improvements that acknowledge the Covina Bowl Google architecture or bowling uses would not occur.

Ability to Achieve Project Objectives

As shown in Table 6-2, the No Project/ No Build Alternative would not meet the Project objectives. The Covina Bowl would not be preserved through adaptive reuse; new residential, commercial/office development opportunities would not be provided to revitalize the plan area; split zoning across parcels would not be eliminated; flexible zoning on the site would not be provided; revitalizing and rehabilitating vacant buildings on the site would not occur; the City's economic base would not be strengthened; and street frontages would not be improved to create neighborhood connectivity by pedestrian-oriented improvements and diagonal on-street parking spaces. Overall, this alternative would not meet the objectives of the proposed Project.

6.7 ALTERNATIVE 2: PRESERVATION OF THE ENTIRE COVINA BOWL BUILDING

Under this alternative, the Covina Bowl building would remain in its current condition to retain the historic structure's significance and the proposed residential development within Planning Areas 1 and 2 would be reduced. Due to the retention of the entire Covina Bowl building, the 65 multi-family residential units that were proposed in that portion of the site would not be developed by this alternative. This would result in a 49.2 percent reduction of residential units, or a maximum of 67 new units. Additionally, the 3,334 square foot lawn bowl area proposed to be located in the area of the rear, west mass of the Covina Bowl building would not be provided under this alternative.

The remaining features of the proposed development would occur under this alternative, including the same rate of parking, type of architectural features, tot lot/playground, and barbeque open space area. Like the proposed Project, this alternative would require a General Plan Amendment from the existing land use designations of General Commercial and High Density Residential to Specific Plan (SP), and a zone change to designate the development portion of the site as a Specific Plan (SD).

The Covina Bowl building is 69,138 square feet and was constructed as a bowling center. As such, the portion of the building that contained the bowling lanes and the rear of building were not designed for public occupancy. When the bowling center closed in 2017, the bowling lanes were removed, and a restriction was

recorded against the property in perpetuity stating it could not be used a bowling alley. The interior and exterior of the building has since deteriorated. Due to the existing condition of the Covina Bowl building with the bowling lanes removed, lack of flooring in the bowling area, and the damaged bowling alley cantilevered ceiling of various heights, any new use of the building would require extensive rehabilitation pursuant current building, seismic, and fire codes, and would also require alterations to rear west mass in order to be occupied for any uses such as retail or assembly. These renovations would require the addition of doors and windows.

Furthermore, all renovations would have to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Since the entire Covina Bowl building was formally determined eligible for listing in the National Register in 2016, the extensive retrofitting and renovations necessary to meet the current building, seismic, and fire codes would themselves result in significant and unavoidable impacts to the historic integrity of the building. Furthermore, the Covina Bowl building is large, encompassing 69,138 square feet. Although historically it included some street-facing retail space, it has remained unoccupied for years prior to the closure of the bowling center in 2017. The demand for retail, commercial, office or assembly/event halls of that size, within a building of that shape that cannot be altered, does not currently exists in the City. Therefore, under this alternative, the Covina Bowl building would remain unoccupied and in its current condition.

6.7.1 ENVIRONMENTAL IMPACTS

Aesthetics

Under the Preservation of Entire Covina Bowl Building Alternative, the Covina Bowl building would remain in its current condition to retain the historic structure, and the proposed residential development would be adjacent to and in the same viewshed as the Covina Bowl building. Consistent with the proposed Project, this alternative would increase the overall visual density of the built environment on the site from offsite locations and the residential buildings would include distinctive architecture to provide compatibility with the existing historic character of the Covina Bowl building. However, without adaptive office reuse of the Covina Bowl building, the visual quality of the site would be reduced due to the lack of onsite compatibility between the new residential buildings and the existing visual character of the aged Covina Bowl building. Additionally, as detailed in Section 5.3, *Cultural Resources*, the non-historic north end addition of the Covina Bowl building is not compatible with original design and other extant features of the building. As the entire Covina Bowl building would remain under this alternative, this historic character incompatibility of the building would also remain. In addition, retention of the rear, west mass of the Covina Bowl building would reduce the provision of open space and landscaping on the site and the visual relief and reduction in visual density provided by open space/recreation areas would be reduced by the Preservation of Entire Covina Bowl Building Alternative. However, both the Preservation of Entire Covina Bowl Building Alternative and the proposed Project would result in less than significant impacts related to visual character and quality.

Additionally, both the proposed Project and the Preservation of Entire Covina Bowl Building Alternative would introduce additional sources of light and glare that would result in similar less than significant impacts with implementation of the City's existing Municipal Code lighting regulations; and this alternative does not include introduction of materials that have highly reflective surfaces. Therefore, lighting and glare related impacts would be similar and less than significant under both the proposed Project and the Preservation of Entire Covina Bowl Building Alternative.

Air Quality

The Preservation of Entire Covina Bowl Building Alternative would reduce the amount and length of construction activities compared to the proposed Project because the Covina Bowl building would remain in

its current condition and 65 fewer multi-family residential units would be developed. This would result in less overall construction-related air quality emissions. Thus, like the proposed Project, the Preservation of Entire Covina Bowl Building Alternative would result in less than significant construction impacts related to air quality.

Also, as the number of residential units would be reduced and the new commercial square footage would be eliminated under this alternative, less operational emissions from consumer products and vehicle trips would occur by this alternative. Thus, consistent with the proposed Project daily operational emissions from the Preservation of Entire Covina Bowl Building Alternative would not exceed SCAQMD thresholds and impacts would be less than significant. Therefore, the Preservation of Entire Covina Bowl Building Alternative would generate less overall air quality emissions than the proposed Project and impacts would be similarly less than significant.

Cultural Resources

As determined in Section 5.3, *Cultural Resources*, the Covina Bowl building is eligible for listing in the National Register, is listed in the California Register of Historical Resources (CRHR) and is eligible for designation as a City Landmark. The proposed Project includes demolition of the rear, west mass that contained the bowling lanes. This would historically materially impair the Covina Bowl building; and although mitigation is provided, impacts would remain significant and unavoidable.

The Preservation of Entire Covina Bowl Building Alternative would retain the Covina Bowl building in its current condition. Due to the retention of the entire building, including the rear, west mass, impacts related to historic resources under this alternative would not occur. However, this alternative would not provide for the adaptive reuse of the Covina Bowl building. As discussed above, the building would require extensive rehabilitation pursuant current building, seismic, and fire codes, and would also require alterations to rear west mass in order to be occupied for any uses such as retail or assembly. These renovations would require, at a minimum, the addition of doors and windows for fire access. Furthermore, all renovations would have to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Since the entire Covina Bowl building was formally determined eligible for listing in the National Register in 2016, the extensive retrofitting and renovations necessary to meet the current building, seismic, and fire codes would themselves result in significant and unavoidable impacts to the historic integrity of the building.

Thus, the Preservation of Entire Covina Bowl Building Alternative would avoid the Project's significant and unavoidable impacts related to historic resources; however, adaptive reuse of the historic resources would not occur. Therefore, this alternative would avoid the significant and unavoidable impacts of the Project, and result in a less than significant impact related to cultural resources. However, the historic related benefits of the Project would also not be realized.

Energy

The Preservation of Entire Covina Bowl Building Alternative would result in a reduced need in energy supplies because 65 fewer multi-family residential units would be developed and operated. In addition, the Covina Bowl building would remain in its existing condition, which requires limited energy supplies, and energy for use of 12,000 square feet of the building would not be needed. Like the proposed Project, the residential units developed by the Preservation of Entire Covina Bowl Building Alternative would be in compliance with the Calgreen/Title 24 requirements related to energy and would include similar features to reduce energy consumptions. As described in Section 5.4, *Energy*, the proposed Project would not use large amounts of energy or fuel in a wasteful manner. Because the Preservation of Entire Covina Bowl Building Alternative would result in 65 fewer residential units, no new commercial square footage, and would implement the same energy efficient infrastructure, this alternative would demand less energy. However, both impacts of the

proposed Project and the Preservation of Entire Covina Bowl Building Alternative would not use large amounts of energy or fuel in a wasteful or inefficient manner and impacts in both conditions would be less than significant.

Geology and Soils

Grading and development of a portion of the Project site would still occur under the Preservation of Entire Covina Bowl Building Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. Although reduced, the multi-family residential structures that would be developed by this alternative would also result in additional persons and structures in the Project site that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the Preservation of Entire Covina Bowl Building Alternative would be required to meet the same regulatory requirements as the proposed Project. Therefore, impacts to geology and soils would be less than significant, which is the same as the proposed Project.

The Preservation of Entire Covina Bowl Building Alternative would retain the existing Covina Bowl building, which would result in a reduced area of ground disturbance. However, this alternative would result in a similar less than significant impact because the potential of paleontological resources to exist onsite is limited due to the previous extensive ground disturbance of the Project site. Thus, like the proposed Project, potential impacts to paleontological resources would also be less than significant.

Greenhouse Gas Emissions

The Preservation of Entire Covina Bowl Building Alternative would reduce the amount and length of construction activities compared to the proposed Project because the Covina Bowl building would remain in its current condition and 65 fewer multi-family residential units would be developed. Thus, this alternative would result in less overall construction related GHG emissions than the proposed Project. In addition, the Preservation of Entire Covina Bowl Building Alternative would generate fewer emissions from operation as 65 fewer multi-family residences and no new commercial square footage would be developed. Therefore, consistent with the proposed Project, impacts related to GHG emissions would from operation of this alternative would be less than significant.

Hazards and Hazardous Materials

As described previously, the proposed Project would remove asbestos-containing materials and lead-based paint prior to demolition or renovation of the existing buildings pursuant to existing requirements that protect human health and the environment from hazards associated with exposure to lead based materials and airborne asbestos fibers. Compliance with these existing regulations, as ensured through the permitting process and included as PPP HAZ-1 and PPP HAZ-2, would reduce potential impacts to a less than significant level.

The Preservation of Entire Covina Bowl Building Alternative would retain the existing Covina Bowl building and any existing asbestos or lead based paint in the building would remain in place. Thus, potential impacts related to removal and disposal of asbestos and lead based materials in this building would be avoided by this alternative; however, the asbestos and lead based materials would remain. Overall, both the proposed Project and the Preservation of Entire Covina Bowl Building Alternative would result in less than significant impacts with implementation of existing regulations, as applicable. Therefore, impacts related to hazards and hazardous materials from the Preservation of Entire Covina Bowl Building Alternative would be neutral in comparison to the proposed Project.

Hydrology and Water Quality

The Preservation of Entire Covina Bowl Building Alternative would result in similar potential construction impacts compared to the proposed Project because similar construction activities and types of soil disturbances would occur. As a result, the Preservation of Entire Covina Bowl Building Alternative would implement standard BMPs through the City's standard permitting process to reduce potential impacts related to water quality during construction, which is similar to the proposed Project. Therefore, construction related hydrology and water quality impacts from the Preservation of Entire Covina Bowl Building Alternative would be similar to those of the proposed Project.

The Preservation of Entire Covina Bowl Building Alternative may result in a reduction of new land use activities compared to the Project. However, like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, source control, site design, and treatment control BMPs that are similar to those included in the proposed Project. Therefore, the Preservation of Entire Covina Bowl Building Alternative would result in impacts to hydrology and water quality that are similar to those that would occur from the proposed Project. Overall, hydrology and water quality impacts would be less than significant, and neutral in comparison to the proposed Project.

Land Use and Planning

The Preservation of Entire Covina Bowl Building Alternative would implement multi-family housing on the Project site, and like the proposed Project would require a General Plan Land Use Amendment and zone change to allow for flexible zoning on the site. Similar to the Project, the Preservation of Entire Covina Bowl Building Alternative would provide housing opportunities; however, 65 less units would be provided, and no additional commercial/office space would be provided for residents and employees in the City. However, like the proposed Project, the Preservation of Entire Covina Bowl Building Alternative would not conflict with a policy or plan adopted for the purpose of avoiding or mitigating an environmental effect. As a result, the proposed Project and the Preservation of Entire Covina Bowl Building Alternative would have similar less than significant impacts as the proposed Project.

Noise

The Preservation of Entire Covina Bowl Building Alternative would reduce the amount and length of construction activities compared to the proposed Project, which in turn would result in less overall construction-related noise and vibration. However, construction related demolition, excavation, and grading activities would continue to occur near residential sensitive receptors. Therefore, like the proposed Project, Mitigation Measure NOI-1 would be required to implement a 90-foot buffer zone to restrict the use of large loaded trucks, heavy mobile equipment greater than 80,000 pounds, and jack hammers within 90-feet of the occupied sensitive receptor locations.

The Preservation of Entire Covina Bowl Building Alternative would also generate noise sources from vehicular trips to and from the site and operation of onsite exterior uses and mechanical equipment. However, the number of vehicular trips generated by this alternative would be less than those generated by the proposed Project; hence, traffic noise under this alternative would be less. Also, the number and type of mechanical systems needed for the Preservation of Entire Covina Bowl Building Alternative would be similar to those used for the proposed Project. Thus, like the proposed Project, the noise generated under this alternative would be less than significant.

Public Services

As described above, under the Preservation of Entire Covina Bowl Building Alternative, would develop 65 fewer multi-family residential units on the Project site, based on the existing average persons per household

of 2.75, this would reduce the total population of onsite residents by 179 persons. Consistent with the proposed Project, this alternative would install security and fire protection systems in the new residential structures; and like the proposed Project the increase of residents on the site would result in additional calls for fire and police services over the existing condition. Likewise, the new residential population would generate students that would utilize local schools. However, because the population size associated with the Preservation of Entire Covina Bowl Building Alternative would be approximately 179 persons less than the proposed Project, this alternative would result in a lower demand for public services, including fire, police, and schools. Because the Project would result in less than significant impacts to public services, the Preservation of Entire Covina Bowl Building Alternative would also result in less than significant impacts. Thus, overall impacts are the same.

Parks and Recreation

The Preservation of Entire Covina Bowl Building Alternative would result in 65 fewer residential units on the Project site, based on the existing average persons per household of 2.75, this would reduce the total population of onsite residents by 179 persons. However, this alternative would eliminate the 3,334 square foot lawn bowl area, which would reduce the total common open space on the site to 1,692 square feet. In comparison to the proposed Project that would result in 363 residents and 5,024 square feet of open space and recreation area that results in a ratio of 13.84 square feet per resident, this alternative would provide 9.20 square feet per resident. Thus, the Preservation of Entire Covina Bowl Building Alternative would be required to pay more park and recreation fees to provide for an appropriate balance between the demand by residents, and the provision of park and recreational facilities. However, under both the proposed Project and the Preservation of Entire Covina Bowl Building Alternative, impacts related to parks and recreation would be less than significant.

Transportation

As described previously, the proposed development within Planning Areas 1 and 2 would result in an increase of 97 p.m. peak hour trips and implementation of Planning Areas 3 and 4 would result in an increase in 94 p.m. peak hour trips that would require implementation of mitigation to reduce to a less than significant level.

The Preservation of Entire Covina Bowl Building Alternative would decrease the number of residential units and eliminate the new commercial/office space within the Covina Bowl building, which would reduce daily trips by 354 and reduce the p.m. peak hour trips by approximately 76 trips compared to the proposed Project. This reduction in trips would result in reduction of the cumulative impact, and mitigation would not be required. However, the intersection of Azusa Avenue/Badillo Street would operate at an unacceptable LOS of E in the p.m. peak hour in 2040, and fair share funding to improve operations would not be provided by the Preservation of Entire Covina Bowl Building Alternative.

Tribal Cultural Resources

The Preservation of Entire Covina Bowl Building Alternative would require less area of site preparation, grading, drainage/utilities/subgrade because the Covina Bowl building would be retained. Thus, less area of soils disturbance would occur under the Preservation of Entire Covina Bowl Building Alternative in comparison to the proposed Project. However, this alternative would require implementation of Mitigation Measure TCR-1 to reduce potential impacts related to unknown buried tribal cultural resources to a less than significant level. Thus, impacts under both the Preservation of Entire Covina Bowl Building Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation.

6.7.2 CONCLUSION

Ability to Reduce Impacts

The Preservation of Entire Covina Bowl Building Alternative would retain the Covina Bowl building in its current condition and 65 fewer multi-family residential units would be developed. In addition, 3,334 square feet less open space and recreation area would be provided. This would avoid the Project's significant and unavoidable impacts related to historic resources. However, adaptive reuse of the Covina Bowl building would not occur because the extensive retrofitting and renovations necessary to meet the current building, seismic, and fire codes that are necessary for the building to be occupied would result in significant and unavoidable impacts to the historic integrity of the building. Furthermore, the building cannot be reoccupied as a bowling center and the demand for 69,138 square feet of retail, commercial, office or assembly/event halls of that size, within a building of that shape that cannot be altered does not exist in the City. Therefore, under this alternative, the Covina Bowl building would remain unoccupied and in its current condition.

Hence, this alternative would avoid the significant and unavoidable impacts of the Project, and result in a less than significant impact related to cultural resources. However, the historic related benefits of the Project would also not be realized because it would not lead to the adaptive reuse of the building and preservation of Google style of roadside commercial architecture. Likewise, the reduction in development that would occur under this alternative would eliminate the requirement for transportation mitigation, however, the intersection of Azusa Avenue/Badillo Street would operate at an unacceptable LOS of E in the p.m. peak hour in 2040, and fair share funding to improve operations would not be provided, which would be required during implementation of the Project. Additionally, the mitigation required for implementation of the proposed Project would continue to be required for the Preservation of Entire Covina Bowl Building Alternative to reduce impacts related to vibration construction and tribal cultural resources to a less than significant level. Overall, although the volume of impacts would be less by the Preservation of Entire Covina Bowl Building Alternative in comparison to the proposed Project, the alternative would result in a reduced beneficial impact.

Ability to Achieve Project Objectives

As shown in Table 6-2, the Preservation of Entire Covina Bowl Building Alternative would meet the Project objectives, but not to the same extent as the proposed Project. The Covina Bowl would not be preserved through adaptive reuse; fewer new residential units would be provided and no new commercial/office development opportunities would be provided within the Covina Bowl building. The Project site would be partially revitalized; revitalizing and rehabilitating vacant buildings on the site would not fully occur as the Covina Bowl building would remain in the existing condition; less open space and recreational amenities would be provided for residents; and the City's economic base would be strengthened to a lesser degree. Overall, this alternative would meet most of the Project objectives, but not to the same extent as the proposed Project.

6.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" when significant environmental impacts result from a proposed Project. The Environmentally Superior Alternative for the proposed Project would be the No Project/No Build Alternative. The No Project/No Build alternative would avoid the significant and unavoidable impacts of the Project and all of the potential construction and operational impacts and would not be required to implement the mitigation measures that are identified in Chapter 5.0 of this EIR that are related to: cultural resources, construction vibration, transportation, and tribal cultural resources. However, this alternative would not provide adaptive reuse of the Covina Bowl building and the building would remain empty, fewer residential units would be developed, and funding for traffic improvements would not occur.

Additionally, CEQA Guidelines Section 15126.6(3)(1) states:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Emphasis added).

Therefore, pursuant to CEQA, because the No Project/No Build Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be the Preservation of Entire Covina Bowl Building Alternative, which would avoid the Project’s significant and unavoidable historic impacts by retaining the Covina Bowl building in its current condition. However, the Preservation of Entire Covina Bowl Building Alternative would not provide adaptive reuse of the Covina Bowl building. Also, the historic documentation, interpretative program, and local historic designation that would be required to occur through implementation of Mitigation Measures CUL-2 through CUL-4 would not occur by the Preservation of Entire Covina Bowl Building Alternative. Therefore, this alternative would avoid the significant and unavoidable impacts of the Project; however, the historic related benefits of the project would also not be realized because it would not lead to the long-term adaptive reuse of the building and preservation of Google style of roadside commercial architecture. In addition, this alternative would continue to require mitigation related to construction vibration and tribal cultural resources.

Therefore, although the significant and unavoidable impacts would be avoided by the Preservation of Entire Covina Bowl Building Alternative, Project benefits would not be fully realized, and it would not eliminate the need for mitigation. In addition, the Preservation of Entire Covina Bowl Building Alternative would not meet most of the Project objectives to the same extent as the proposed Project. The Covina Bowl would not be preserved through adaptive reuse; fewer new residential units would be provided and no new commercial/office development opportunities would be provided; the Project site would be partially revitalized; revitalizing and rehabilitating vacant buildings on the site would not fully occur as the Covina Bowl building would remain in the existing condition; less open space and recreational amenities would be provided for residents; and the City’s economic base would be strengthened to a lesser degree. Overall, this alternative would meet most of the Project objectives, but not to the same extent as the proposed Project.

CEQA does not require the Lead Agency (the City of Covina) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Table 6-1 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 6-2 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

Table 6-1: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Preservation of Entire Covina Bowl Building
Aesthetics	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Air Quality	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Cultural Resources	Significant and unavoidable	Less, Less than significant	Less, Less than significant, but not long-term preservation of historic achieved though adaptive reuse
Energy	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Geology and Soils	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Greenhouse Gas Emissions	Less than significant	Less, less than significant	Same as proposed Project, less than significant
Hazards and Hazardous Materials	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Hydrology and Water Quality	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Land Use and Planning	Less than significant	Same as proposed Project, less than significant	Same as proposed Project, less than significant
Noise	Less than significant with mitigation	Less, less than significant	Same as proposed Project; less than significant with mitigation
Public Services	Less than significant	Less, but also less than significant	Same as proposed Project, less than significant
Parks and Recreation	Less than significant	Less, but also less than significant	Same as proposed Project, less than significant
Transportation	Less than significant with mitigation	Less, Less than significant, but benefits from mitigation not achieved	Less, Less than significant, but benefits from mitigation not achieved
Tribal Cultural Resources	Less than significant with mitigation	Less, no impacts, no mitigation required	Same as proposed Project; less than significant with mitigation
Reduce Impacts of the Project?		Yes	Yes
Areas of Reduced Impacts Compared to the Project		7	2, but requires some mitigation, and the benefits of the mitigation not required would not be realized

Table 6-2: Comparison of the Proposed Project and Alternatives Ability to Meet Objectives

	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Preservation of Entire Covina Bowl Building
Preserve the historic Covina Bowl through adaptive reuse	Yes	Yes, but not to the same extent as Alternative 2	No
Provide new residential, commercial, and office development opportunities to revitalize the plan area	Yes	Yes, but not to the same extent as the proposed Project.	Yes, but not to the same extent as the proposed Project.
Eliminate split zoning across parcels and encouraging the planned development of the properties within the plan area that accommodate a range of land uses to meet evolving market demands.	Yes	No	Yes, but not to the same extent as the proposed Project.
Provide a more flexible regulatory procedure by which the objectives of the City's General Plan and Zoning Code can be realized.	Yes	No	Yes, but not to the same extent as the proposed Project.
Encourage creative approaches to the use of land through variation in siting of buildings and the appropriate mixing of office, residential and commercial land uses and activities	Yes	No	Yes, but not to the same extent as the proposed Project.
Eliminate and prevent the spread of blight by revitalizing and rehabilitating vacant buildings	Yes	No	Yes, but not to the same extent as the proposed Project.
Strengthen the City's economic base by revitalizing the plan area to its full economic potential	Yes	No	Yes, but not to the same extent as the proposed Project.
Provide for-sale multifamily residential with a range of sizes to encourage first-time homebuyers	Yes	No	Yes, but not to the same extent as the proposed Project.
Ensure new residential development includes adequate open space and high quality recreational amenities for future residents	Yes	No	Yes, but not to the same extent as the proposed Project.
Bolster an economically vibrant and active walkable environment through introduction of mixed uses	Yes	No	Yes, but not to the same extent as the proposed Project.
Draw more patrons to surrounding commercial uses and expand walkability through enhanced pedestrian-oriented development within the plan area	Yes	No	Yes, but not to the same extent as the proposed Project.
Enhance the appearance of the community by redeveloping and upgrading the properties and street frontages within the Specific Plan area through creative site planning, high quality architecture, enhanced landscaping and lighting, while embracing the character of the historic Covina Bowl	Yes	No	Yes, but not to the same extent as the proposed Project.
Transform street frontages and create neighborhood connectivity through pedestrian-oriented improvements and diagonal on-street parking spaces on N. Rimsdale Avenue	Yes	No	Yes, but not to the same extent as the proposed Project.

7.0 EIR Preparers

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