# Initial Study and Mitigated Negative Declaration

## Amazon Delivery Station DAX9 Project


Prepared for

City of West Covina
1444 West Garvey Avenue South
West Covina, CA 91790
Contact: Jo-Anne Burns
626.939.8761

Prepared by

Psomas
5 Hutton Centre Drive, Suite 300
Santa Ana, California 92707
Contact: Alia Hokuki, AICP
714.481.8065


July 13, 2021

# TABLE OF CONTENTS

## TABLES

**Table** **Page**

## EXHIBITS

**Exhibit** **Follows Page**



## APPENDICES

**Appendix**

## ACRONYM LIST

| | |
|---|---|
| AAM | Annual Arithmetic Mean |
| AB | Assembly Bill |
| ACM | asbestos-containing materials |
| ADT | Average Daily Traffic |
| AGI | AdvanceGeo, Inc. |
| ALW | Azusa Light & Water |
| AQMD | Air Quality Management District |
| AQMP | Air Quality Management Plan |
| bgs | below the existing ground surface |
| BMP | Best Management Practice |
| CAAQS | California Ambient Air Quality Standards |
| CalARPP | California Accidental Release Prevention Program |
| CalEEMod | California Emissions Estimator Model |
| CalEPA | California Environmental Protection Agency |
| CalFire | California Department of Forestry and Fire Prevention |
| CALGreen Code | California Green Building Standards Code |
| CalOSHA | State Occupational Safety and Health Regulations |
| Caltrans | California Department of Transportation |
| CARB | California Air Resources Board |
| CBC | California Building Code |
| CCR | California Code of Regulations |
| CDFW | California Department of Fish and Wildlife |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CGS | California Geological Survey |
| $CH_4$ | methane |
| City | City of West Covina |
| CMU | Concrete Masonry Unit |
| CNEL | Community Noise Equivalent Level |
| CO | carbon monoxide |
| $CO_2$ | carbon dioxide |
| Cortese List | Hazardous Waste and Substances Site List |
| CPUC | California Public Utilities Commission |
| CREC | controlled recognized environmental conditions |
| CWA | Clean Water Act |
| dB | decibel |
| dBA | A-weighted decibel scale |
| DIFs | Development Impact Fees |
| DOC | Department of Conservation |
| DPM | diesel particulate matter |
| DSP | Delivery Service Partners |

| | |
|---|---|
| DTSC | Department of Toxic Substances Control |
| EAP | Energy Action Plan |
| EIR | Environmental Impact Report |
| EMFAC | EMissions FACtor |
| EO | Executive Order |
| ESA | Environmental Site Assessment |
| FEMA | Federal Emergency Management Agency |
| FHWA | Federal Highway Administration |
| FMMP | Farmland Mapping and Monitoring Program |
| ft | feet |
| FTA | Federal Transportation Administration |
| GHG | greenhouse gas |
| GP | General Plan |
| HCM | Highway Capacity Manual |
| HCP | Habitat Conservation Plan |
| HFC | hydrofluorocarbons |
| HREC | historical recognized environmental conditions |
| HVAC | heating, ventilation, and air conditioning |
| HWCA | California Hazardous Waste Control Act |
| HWSA | hazardous waste storage area |
| Hz | Hertz |
| I | Interstate |
| ICU | Intersection Capacity Utilization |
| IRPs | integrated resources plans |
| IS | Initial Study |
| IS/MND | Initial Study/Mitigated Negative Declaration |
| ISSD | Investigative & Support Services Division |
| ITE | Institute of Transportation Engineers |
| km | kilometer |
| LACSD | Los Angeles County Sanitation District |
| LBP | lead-based paint |
| LED | Light-Emitting Diode |
| $L_{eq}$ | energy average |
| LID | low impact development |
| $L_{max}$ | maximum noise level |
| LOS | Level of Service |
| LST | localized significance threshold |
| Lw | Sound Power Level |
| MBTA | Migratory Bird Treaty Act |
| MEI | maximally exposed individual |
| $mg/m^3$ | milligrams per cubic meter |
| MLD | most likely descendant |
| MPH | miles per hour |

| | |
|---|---|
| MND | Mitigated Negative Declaration |
| MRF | Materials Recovery Facility |
| MRZs | Mineral Resources Zones |
| MRZ-1 | Mineral Resource Zone-1 (an area with no significant mineral deposits) |
| MRZ-2 | Mineral Resource Zone-2 (an area with significant mineral deposits) |
| MRZ-3 | Mineral Resource Zone-3 (an area containing known mineral resources of undetermined significance) |
| $MTCO_2e$ | metric tons of carbon dioxide equivalent |
| $MTCO_2e/yr$ | metric tons of carbon dioxide equivalent per year |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NCCP | Natural Community Conservation Plan |
| ND | Negative Declaration |
| NDS | National Data & Surveying Services |
| NHMP | Natural Hazard Mitigation Plan |
| NPDES | National Pollutant Discharge Elimination System |
| NRHP | National Register of Historic Places |
| $N_2O$ | nitrous oxide |
| $NO_2$ | nitrogen dioxide |
| NOI | Notice of Intent |
| $NO_x$ | nitrogen oxide |
| NRHP | National Register of Historic Places |
| $O_3$ | ozone |
| OEHHA | Office of Environmental Health Hazard Assessment |
| OPR | Governor's Office of Planning and Research |
| OSHA | Federal Occupational Safety and Health Regulations |
| PCE | Tetrachloroethene |
| PFC | perfluorocarbons |
| PlanWC | City of West Covina General Plan |
| PM2.5 | fine particulate matter with a diameter of 2.5 microns or less |
| PM10 | respirable particulate matter with a diameter of 10 microns or less |
| ppm | parts per million |
| PPV | peak particle velocity |
| PRD | Permit Registration Document |
| RCNM | roadway construction model |
| RCRA | Resource Conservation and Recovery Act |
| REC | recognized environmental condition |
| RH | relative humidity |
| RMS | root mean square |
| RPS | Renewable Portfolio Standard |
| RTP | Regional Transportation Plan |
| RTP/SCS | Regional Transportation Plan/Sustainable Communities Strategy |
| RWQCB | Regional Water Quality Control Board |

| | |
|---|---|
| SB | Senate Bill |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCE | Southern California Edison |
| SCGC | Southern California Gas Company |
| SCS | sustainable communities strategy |
| sf | square feet |
| $SF_6$ | sulfur hexafluoride |
| SGVCOG | San Gabriel Valley Council of Governments |
| SIP | State Implementation Plan |
| SJCWRP | San Jose Creek Water Reclamation Plant |
| SLM | Sound Level Meter |
| SLs | Screening Levels |
| $SO_2$ | sulfur dioxide |
| SoCAB | South Coast Air Basin |
| SP | Specific Plan |
| SPL | sound pressure level |
| SR | State Route |
| SUSMP | standard urban stormwater mitigation plan |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Resources Control Board |
| TACs | toxic air contaminates |
| TIS | Traffic Impact Study |
| TMC | turning movement counts |
| TNM 3.0 | Traffic Noise Model Version 3.0 |
| TWLTL | two-way-left-turn-lane |
| $\mu g/m^3$ | micrograms per cubic meter |
| USACE | U.S. Army Corps of Engineers |
| USEPA | U.S. Environmental Protection Agency |
| USFWS | U.S. Fish and Wildlife Service |
| V/C | volume/capacity |
| VdB | vibration decibels |
| VHFHSZ | Very High Fire Hazard Severity Zone |
| VMT | vehicle miles traveled |
| VOCs | volatile organic compounds |
| WCFD | West Covina Fire Department |
| WCPD | West Covina Police Department |
| WCUSD | West Covina Unified School District |
| WELO | Water Efficient Landscape Ordinance |
| WNRP | Whittier Narrows Reclamation Plant |

*This page intentionally left blank*

# SECTION 1.0 INTRODUCTION

## 1.1 OVERVIEW

Following a preliminary review of the proposed Amazon Delivery Station DAX9 Project, (hereinafter referred to as the "Project"), the City of West Covina (City) determined that the Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study (IS) addresses the direct, indirect, and cumulative environmental effects associated with the Project, as proposed.

The Project is located at 1211 East Badillo Street (current address) and involves the repurposing of a former 177,440 square foot (sf) industrial building, that has recently been utilized by Faith Church. The Project Applicant (i.e., Greenlaw Partners) is proposing to establish an Amazon Delivery Station with approximately 250 employees. The facility would operate as a light warehousing and distribution operation as retail products are sold on-line and delivered to the local community. The required entitlements would include a General Plan Amendment, Zone Change, Precise Plan, Parcel Map and Tree Removal Permit. Sections 3.0., Project Description, provides a detailed description of the Project.

## 1.2 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with CEQA of 1970, as amended (*California Public Resources Code,* Section 21000–21177) and pursuant to the State CEQA Guidelines (Title 14, *California Code of Regulations* [CCR]*,* Chapter 3, Section 15063), the City, acting in the capacity of the Lead Agency, is required to undertake the preparation of an IS to determine if the Project would have significant environmental impacts. The environmental documentation, which is ultimately selected by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions on the Project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approval would be required.

The environmental documentation and supporting analysis will be subject to a public review period. During this review, public comments on the documentation should be addressed to the City. Following the review of any comments received pertaining to the CEQA review, the City will consider these comments as a part of the Project's environmental review and determination. The comments will be included with the IS documentation for consideration by the City of West Covina's Planning Commission and City Council.

## 1.3 PURPOSE OF THE INITIAL STUDY

The purpose of the IS is to: (1) identify environmental impacts; (2) provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), Mitigated Negative Declaration (MND) or Negative Declaration (ND); (3) enable a Lead Agency or Applicant to modify a Project, mitigating potential adverse impacts before an EIR is prepared; (4) facilitate an environmental assessment early in the design of a Project; (5) provide documentation of the factual basis for the finding in an MND or ND that a Project would not have a significant environmental effect; (6) eliminate needless EIR's; (7) determine whether a previously prepared EIR could be used for a Project; and (8) assist in the preparation of an EIR, if required, by focusing the EIR on the effects determined to be significant, identifying the effects determined not to be significant, and explaining the reasons for determining that potentially significant effects would not be significant.

Section 15063 of the State CEQA Guidelines identifies specific disclosure requirements for inclusion in an IS. Pursuant to those requirements, an IS must include the following: (1) a description of the Project, including the location of the Project; (2) an identification of the environmental setting; (3) an identification of environmental effects by use of a checklist; (4) a discussion of ways to mitigate significant effects identified, if any; (5) an examination of a Project's compatibility with existing zoning, plans, and other applicable land use controls; and (6) the name of the person or persons who prepared or participated in the preparation of the IS.

## 1.4 CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

In accordance with CEQA and the State CEQA Guidelines, this IS has been prepared for the proposed Project and its associated discretionary approvals. The IS indicates that the potentially significant impacts of the Project can be reduced to less than significant levels with implementation of mitigation measures, and therefore, the Project requires preparation of an Initial Study/Mitigated Negative Declaration (IS/MND).

This IS/MND serves as the environmental document that presents the analysis of Project impacts on each of the environmental topic areas in the CEQA Environmental Checklist provided in Section 4.0. This document will serve to inform City decision makers, representatives of affected trustee and responsible agencies, and other interested parties of the potential environmental effects that may occur with approval and implementation of the proposed Project.

## 1.5 CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW AND COMMENT

This IS/MND has been submitted to potentially affected agencies and individuals. Notices of the availability of the IS/MND for review and comment, as well as the environmental documentation are available on the City of West Covina's website (https://www.westcovina.org/departments/community-development/planning-division/projects-and-environmental-documents-copy) for review.

A 30-day public review period has been established for the IS/MND (July 13 to August 11, 2021) in accordance with Section 15073 of the State CEQA Guidelines. During review of the IS/MND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the potentially significant effects of the Project can be avoided or mitigated. Comments on the IS/MND and the analysis contained herein must be received by 5:00 PM on August 11, 2021, and should be addressed to:

City of West Covina
Planning Division
Attention: Jo-Anne Burns
Planning Manager
1444 West Garvey Avenue South
West Covina, California 91790

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation—such as an EIR or an expanded IS/MND—may be required. If not, the Project and the environmental documentation are tentatively scheduled to be submitted to the West Covina Planning Commission and City Council for consideration.

## 1.6 ORGANIZATION OF THE INITIAL STUDY

The IS/MND is organized into sections, as described below.

- **Section 1.0: Introduction.** This section provides an introduction, Project summary, and overview of the conclusions in the IS/MND.
- **Section 2.0: Project Location and Environmental Setting.** This section provides a brief description of the Project location, relevant background information, and a description of the existing conditions of the Project site and vicinity.
- **Section 3.0: Project Description.** This section provides a description of the proposed Project, a statement of purpose and need, and necessary discretionary approvals.
- **Section 4.0: Environmental Checklist and Analysis.** The completed Environmental Checklist Form from the State CEQA Guidelines provides an overview of the potential impacts that may or may not result from Project implementation. The Environmental Checklist Form also includes “mandatory findings of significance”, as required by CEQA. The analysis concludes the significance of impacts and Standard Conditions, Regulatory Requirements, and Mitigation Measures to reduce potentially significant impacts.
- **Section 5.0: References.** This section identifies the references used to prepare the IS/MND.

*This page intentionally left blank*

# SECTION 2.0 PROJECT LOCATION AND SETTING

## 2.1 PROJECT LOCATION

The proposed Project is located at 1211 East Badillo Street (current address) in the City of West Covina (City), in Los Angeles County, California. Refer to Exhibit 2-1, Regional Location and Local Vicinity. The Project Applicant is proposing to change the building address to 1200 West San Bernardino Road. The 21.22-acre site is situated north of Badillo Road and south of East San Bernardino Road. Surrounding uses include single family residences to the south of Badillo Road; multi-family residences (Lark Ellen Village) immediately to the east of the site; and multi-family residences to the north of East San Bernardino Road within the City of Covina. Various commercial, retail, and industrial uses are situated to the west of the site.

## 2.2 EXISTING SITE AND AREA CHARACTERISTICS

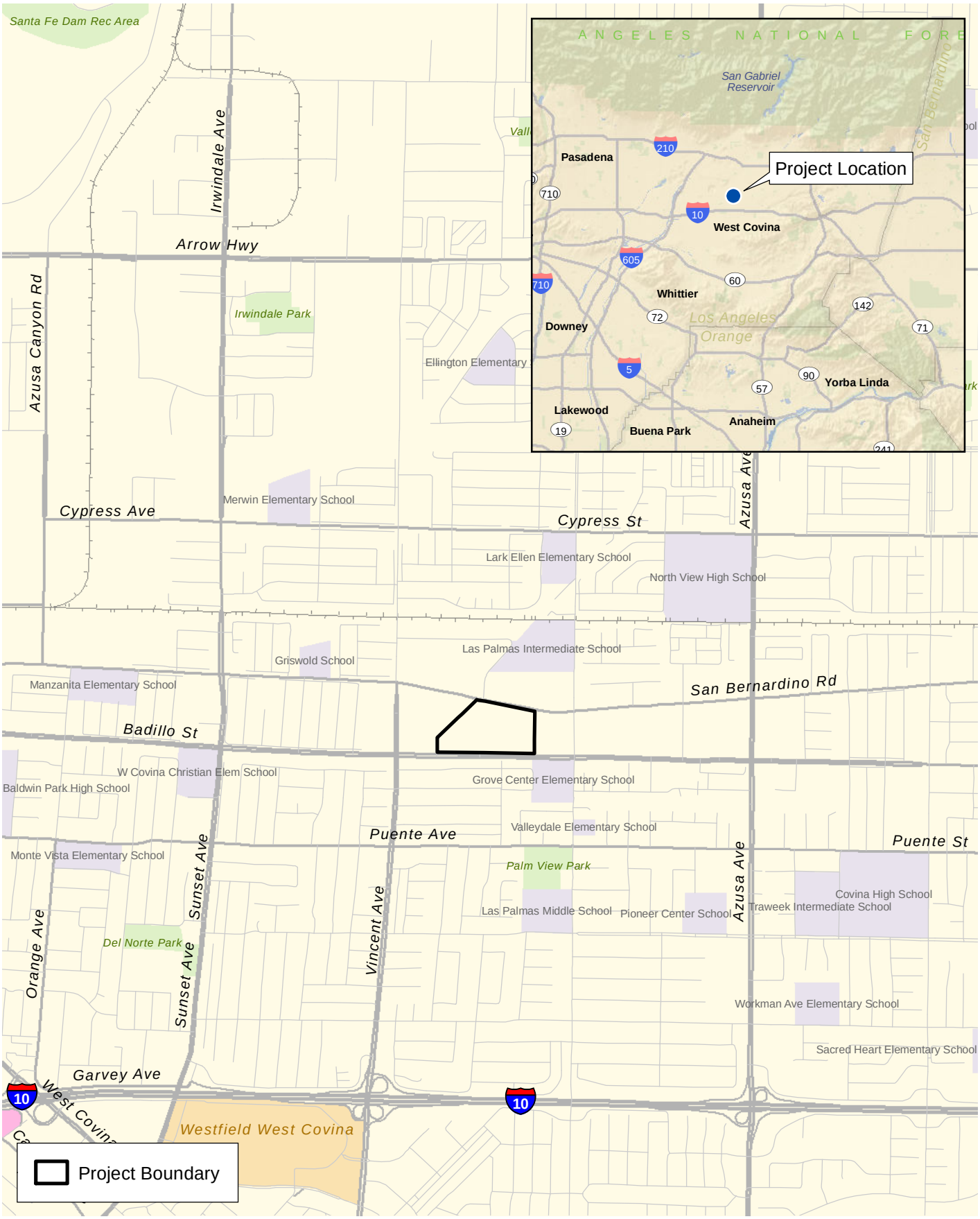
On-site conditions include a 177,440-sf industrial building centrally located and surrounded by paved surface parking lots to the west, east and south and mature landscaping throughout the site. A small playground adjoins the building to the east. The portion of the site, north of the building, consists of ornamental landscaping and vegetation. The site also contains landscaping around the southern and western sides of the building and along the western, southern, and eastern perimeter of the site. Planter beds are situated throughout the southern and eastern parking lots. Site access is available from Badillo Road via four driveways and East San Bernardino Road via three driveways.

The existing building is an industrial concrete tilt up single-story structure with supporting interior office areas. The building was built in the 1960's and was used by Honeywell Corporation and Hughes Aircraft/Electronics. Industrial operations moved from the area in the 1990's and the property was purchased by Faith Church and associated private school. The church is relocating and the property is being sold.

## 2.3 SURROUNDING LAND USES

The Project site is located within an urbanized portion of the City that includes a mix of uses including residential, retail, warehouse, commercial office, commercial, and light industrial. As shown on Exhibit 2-2, the site is surrounded by East San Bernardino Road and multi-family residences within the City of Covina to the north; Badillo Street and single-family residences to the south; multi-family residences (Lark Ellen Village) immediately to the east; and various industrial, commercial, and retail uses situated to the west. Additional uses beyond the immediate borders of the site are summarized below:

- North: East San Bernardino Road, which then transitions into the City of Covina. Uses to the north of East San Bernardino Road include the Mountain View Venture Apartments, commercial offices (South California Edison Customer Service Business Unit), various light industrial and warehouse uses east of Cutter Way, which extend to North Vincent Avenue; and the Las Palmas Middle School.
- South: Badillo Street, which then transitions to a single-family residential neighborhood in the City of West Covina.
- East: Lark Ellen Village residential community is immediately adjacent to the site. Kindred Hospital San Gabriel Valley and commercial offices are situated further east. North Lark Ellen Avenue is further east as well as single-family residences, a 7-Eleven, and The




D:\Projects\3GRE\170100\MXD\ex_RL_LV_20210510.mxd

# Regional Location and Local Vicinity

Exhibit 2-1

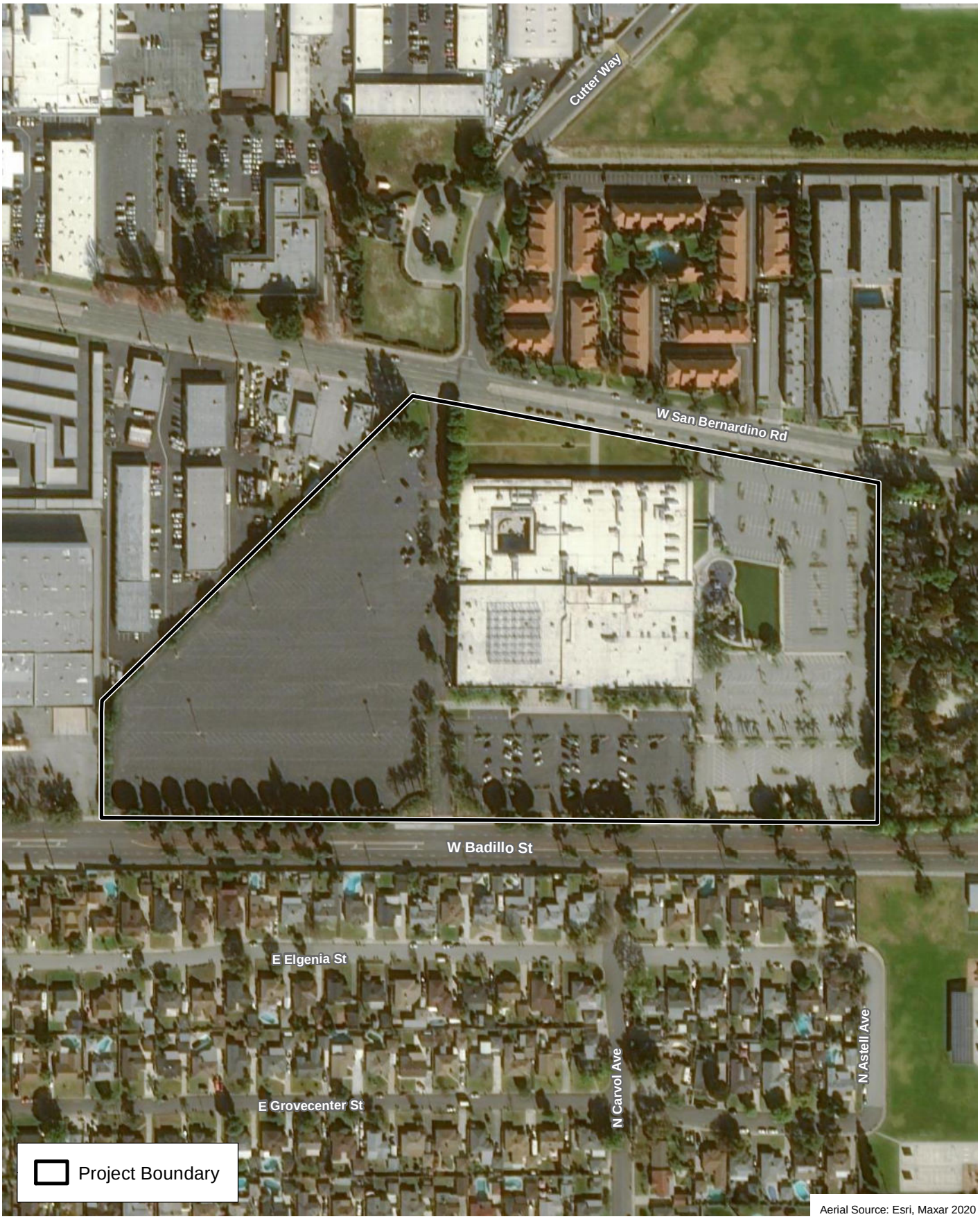
*Amazon Delivery Station DAX9 Project*

N W E S

2,000 1,000 0 2,000 Feet

PSOMAS

(Rev: 05/10/2021 MDM) R:\Projects\GRE\3GRE170100\Graphics\ex2-1_RL_LV.pdf




Aerial Source: Esri, Maxar 2020

D:\Projects\3GRE\170100\MXD\ex_Aerial_20210510.mxd

# Aerial Map

## Exhibit 2-2

*Amazon Delivery Station DAX9 Project*

N
W E
S

250 125 0 250

Feet

PSOMAS

(Rev: 05/10/2021 MDM) R:\Projects\GRE\3GRE170100\Graphics\ex2-2_Aerial.pdf

Church of Jesus Christ of Latter-day Saints, all located in the City of Covina. Also to the southeast is Grovecenter Elementary School, in the City of Covina.

- West: Covina Industrial Park, which consists of several auto maintenance/muffler shops, print shops, dining, retail, flooring, and other various contractors. HY International (shoe store and distributor) and Extra Space Storage are also situated to the west.

## 2.4 GENERAL PLAN DESIGNATION AND ZONING DESIGNATION

The Project site currently has a General Plan (GP) land use designation of Civic: Public Institution. The current Zoning is SP-11: Faith Community Church.

The City of West Covina General Plan (PlanWC) describes the Civic designation as planning areas that accommodate places of government offices, libraries, schools, community centers, and places of religious worship.

The current Zoning of SP-11 accommodates church and school uses on the subject site.

# SECTION 3.0 PROJECT DESCRIPTION

## 3.1 PROJECT CHARACTERISTICS

Amazon Inc., through its development partner, Greenlaw Partners, is seeking to locate in the City of West Covina (City) and repurpose the proposed Project site for a last mile delivery station. Delivery stations power the last mile of the order fulfillment process and help to speed up deliveries for customers. Packages are transported to delivery stations via trailer trucks (18 wheelers) from Amazon fulfillment and sortation centers and are sorted, picked, and loaded into delivery vehicles. The packages would (1) enter the facility through the loading dock positions; (2) be sorted from a conveyor area; (3) be stored on mobile "Baker Racks"; and (4) be rolled to the delivery van loading area.

The proposed Project involves the revitalization and modernization of the existing on-site building. The footprint for the structure would not change. The proposed building improvements on-site include demolition of portions of the tilt up walls for proposed dock door openings, as well as existing non-load bearing walls, plumbing, electrical, an existing mezzanine, and existing storefront for new roll up drive in/drive out doors. Eight new loading dock spaces/doors (at a higher height than existing doors and six new exterior overhead van doors (north and south elevations) would be installed. Construction work would include structural improvements, electrical, mechanical, plumbing, and overall site work. Two 12-foot high screen walls would be constructed, one south of the approach driveway and adjacent to the loading dock area (525 feet including a 26-foot wide gate) and one north of the loading dock area (271.9 feet including a 26-foot wide gate). The material for the 12-foot high walls includes a standard Concrete Masonry Unit, which is to be painted a matching color to the main building.

Interior modifications would include demolition of interior walls. Exterior property work would include removal of the playground area, pavement restriping, new directional striping and reconfiguration of the parking layouts, new smoker shelter at the north/east corner of the building, a new rideshare shelter, standard site directional and operational signage, and building mounted signage.

Other proposed modifications/improvements include relocation of existing on-site fire hydrants, and installation of platforms that are to be constructed at the truck court. New site fencing and gates would be located around the employee parking area on the west side of the building and no new fencing or gates would be installed around the perimeter of the site. Curb repair is also proposed, as well regrading for the van exit location at East San Bernardino Road in order to fix existing drainage low spots. This would include construction of new low impact development (LID) Stormwater Treatment Best Management Practices (BMPs) on the north side of the existing building. Additionally, all existing light poles would be removed and new fixtures, pole bases, light poles, and building mounted lighting would be installed in accordance with City lighting requirements and illumination standards.

The landscape design is proposed to bring the site into closer conformance with the State's Water Efficient Landscape Ordinance (WELO). Renovation of the site would include removal of high-water use, trees, and shrubs. The proposed new landscape plant pallet includes a mix of drought tolerant shrubs, grasses, and ground cover, as well as a variety of shade trees to be used throughout the parking area and around the perimeter of the site. The new irrigation would adhere to the requirements found in WELO and the City's landscape and irrigation guidelines for commercial and industrial properties.

Existing parking areas would be restriped, and barriers would be erected to separate truck traffic from passenger traffic beyond the westernmost driveway to East San Bernardino Road. A total of 811 parking spaces would be provided — 185 for passenger vehicles and 626 for vans. Eight loading docks are to be located on the west side of the building and a hardscape (or partially paved) courtyard on the east side of the building would be converted to stage delivery vehicles prior to entering the south side of the building for loading.

The site is accessed from Badillo Street, via four driveways. The two westernmost driveways on Badillo Street have full access with left turn lanes carved from the landscape median. The other two are restricted to right turns. All three driveways on San Bernardino Road currently have full access, but none feature a left turn lane from San Bernardino Road. The easternmost of these driveways would be restricted to right turns and the central driveway would be limited to existing delivery vehicles. The middle driveway on East San Bernardino Road would be relocated to the west to operate as an exclusive exit only for delivery vehicles. The westerly most driveway, on San Bernardino Road, is to be relocated to align with Cutter Way and a new left turn pocket and a traffic light would be installed on San Bernardino Road. In addition, all trucks would access the site traveling westbound and would make a left turn into the westerly most driveway. All trucks would arrive and depart to the east.

Exhibit 3-1, Concept Plan, provides a Plan View perspective of the onsite layout. The color-coded Operational Plan, depicted in Exhibit 3-2, illustrates the locations of the driveways, designated parking, staging, and loading areas:

- Yellow for Associate/Employee Spaces;
- Dark Pink for Van Staging Areas;
- Purple for Van Parking Areas;
- Light Pink for Trailer/Box Truck Loading; and
- Green for parcel loading areas.

There are three types of jobs at the delivery station. Amazon employees, which include associates that help with sorting packages inside the delivery station and managers who manage the sortation process. Delivery Service Partners (DSP) are entrepreneurs who have launched their own small busines delivery packages on behalf of Amazon. DSP's operate out of Amazon's delivery stations and employ delivery drivers who deliver Amazon packages utilizing Amazon vans. Flex drivers are independent contractors that use their own vehicles to deliver packages.

The delivery station would operate 24 hours a day, 7 days a week to support delivery of packages to customer locations between 11:00 AM and 10:00 PM. Table 3-1, Daily Vehicle Operations Onsite, describes the daytime, evening and nighttime movement of vehicles onsite. Employee and delivery shifts are designed to avoid typical commuting peak periods. Typically, 14 line-haul trucks per day would deliver packages from a sorting facility about 20 miles southeast of the site. Most trucks would arrive and depart after the evening commuting peak period and before the morning peak commuting period. The remainder would be spread throughout the day.

DPS van drivers would enter the site in the morning and park their vehicle in the van driver parking lot located southwest of the building. They would then pick up a van in the van parking lot area (south and east portions of the site) and would drive to the staging and loading area to load their packages to deliver. Once the delivery is complete, they would return to the site and park and van back in the van parking lot area and leave using a personal vehicle or public transport.


Source: MG2 2021

# Concept Site Plan

Exhibit 3-1

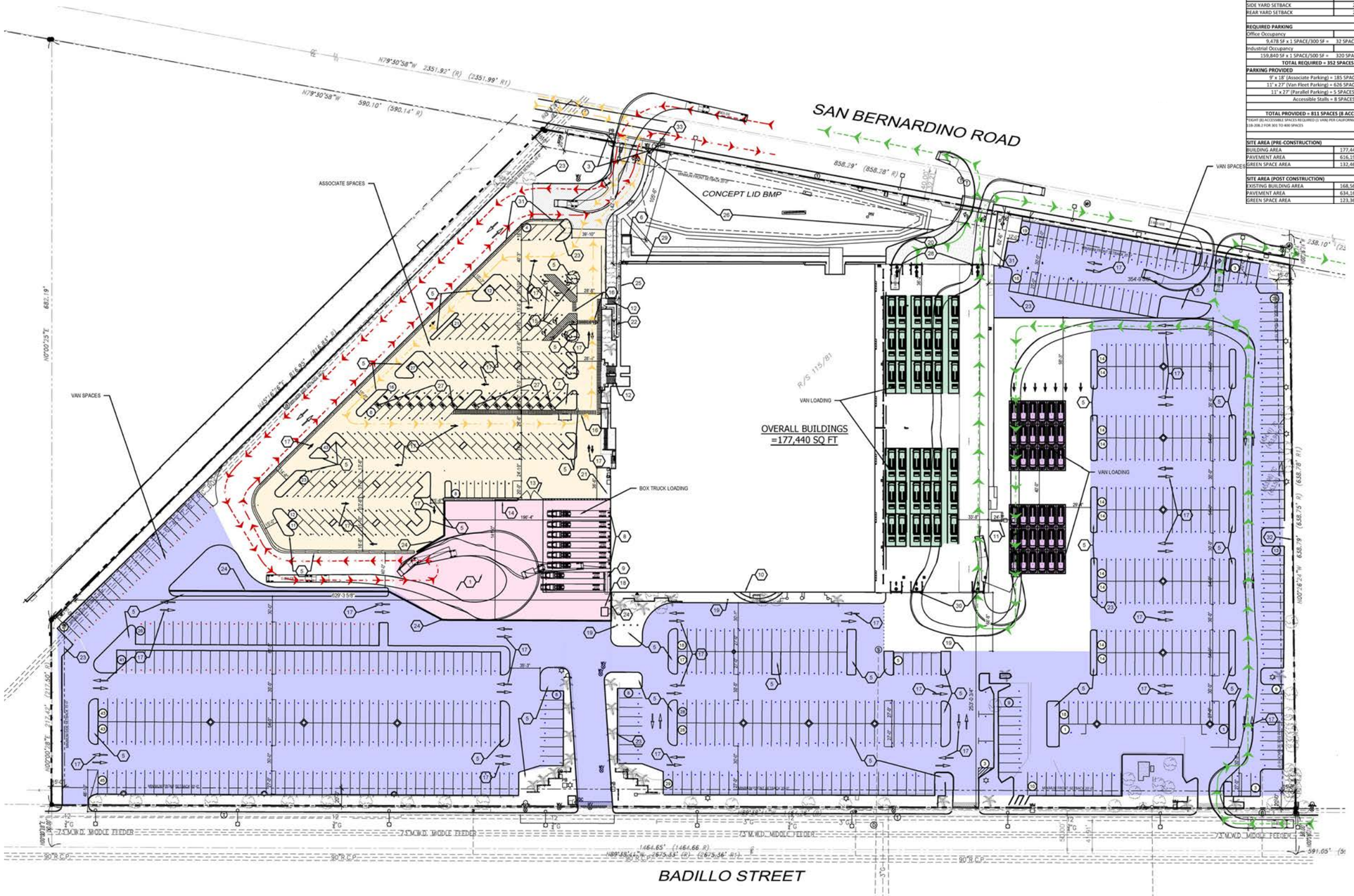
*Amazon Delivery Station DAX9 Project*

N
W E
S

PSOMAS

(05/10/2021 MDM) R:\Projects\GRE\3GRE170100\Graphics\ex3-1_ConceptSitePlan.pdf

D:\Projects\3GRE\170100\GRAPHICS\ex_ConceptSitePlan_20210105.ai




| PROJECT DATA | | |
|---|---|---|
| SITE ADDRESS | 1200 E SAN BERNARDINO | |
| TOTAL SITE AREA | 926,101 SF | 20.51 AC |
| ZONING | Industrial | |
| PARCEL NUMBER | 0434-015-018 | |
| | Adjacent to Residential | Adjacent to Nonresidential |
| SETBACKS | | |
| FRONT YARD SETBACK | 30 FT | 25 FT |
| SIDE YARD SETBACK | 25 FT | 5 FT |
| REAR YARD SETBACK | 25 FT | 12 FT |
| REQUIRED PARKING | | |
| Office Occupancy | | |
| 9,478 SF x 1 SPACE/300 SF = | 32 SPACES | |
| Industrial Occupancy | | |
| 159,840 SF x 1 SPACE/500 SF = | 320 SPACES | |
| TOTAL REQUIRED = 352 SPACES | | |
| PARKING PROVIDED | | |
| 9' x 18' (Associate Parking) = 185 SPACES | | |
| 11' x 27' (Van Fleet Parking) = 626 SPACES | | |
| 11' x 27' (Parallel Parking) = 5 SPACES | | |
| Accessible Stalls = 8 SPACES (1 VAN) | | |
| TOTAL PROVIDED = 811 SPACES (8 ACCESSIBLE (1 VAN))* | | |
| *EIGHT (8) ACCESSIBLE SPACES REQUIRED (1 VAN) PER CALIFORNIA ACCESSIBILITY CODE TABLE 11B-208.2 FOR 301 TO 400 SPACES | | |
| SITE AREA (PRE-CONSTRUCTION) | | |
| BUILDING AREA | 177,440 SF | 19.2% |
| PAVEMENT AREA | 616,197 SF | 66.5% |
| GREEN SPACE AREA | 132,464 SF | 14.3% |
| SITE AREA (POST CONSTRUCTION) | | |
| EXISTING BUILDING AREA | 168,569 SF | 18.2% |
| PAVEMENT AREA | 634,165 SF | 68.5% |
| GREEN SPACE AREA | 123,367 SF | 13.3% |

| PARKING BREAKDOWN | |
|---|---|
| PARKING | PROPOSED ON-SITE |
| ASSOCIATE SPACES (9'x18') | 185 |
| VAN SPACES (11'X27') | 626 |
| TOTAL PARKING | 811 |
| UTR / VAN LOADING | 36 |
| VAN STAGING | 36 |
| TRAILER / BOX TRUCK LOADING | 8 |

**KEY NOTES**

1. PROPOSED LOADING DOCK AREA
2. EXISTING CONCRETE SIDEWALK
3. NEW ACCESSIBLE CURB RAMP
4. PROPOSED ILLUMINATED MONUMENT/PYLON SIGN, SEE ELEVATION 2/A0.11
5. PROPOSED LANDSCAPE ISLAND
6. PROPOSED PREFABRICATED ALUMINUM SMOKERS SHELTER WITH 7' WALL HEIGHT, SEE 4/A0.11
7. PROPOSED RIDE-SHARE ALUMINUM SHELTER WITH 7' WALL HEIGHT, SEE 3/A0.11
8. PROPOSED LOADING DOCK DOOR OPENINGS
9. PROPOSED EXTERIOR METALLIC PREFABRICATED PLATFORM
10. EXISTING BUILDING
11. EXISTING ELECTRICAL TRANSFORMER TO REMAIN
12. EXISTING STAIRS TO REMAIN
13. PROPOSED METALLIC CHAIN LINK SWING DOORS APPROXIMATED 7' HEIGHT
14. PROPOSED LANDSCAPE BUFFER BETWEEN LOADING DOCK AND ASSOCIATE PARKING LOT
15. PROPOSED ACCESSIBLE PARKING STALL CONFIGURATION PER LOCAL CODE
16. PROPOSED STRIPED PEDESTRIAN ACCESS
17. PROPOSED PAINTED TRAFFIC MARKINGS
18. PROPOSED TRASH ENCLOSURE WITH A MIN. 5'-5" CMU SCREEN WALL AND SOLID ROOF COVER.
19. EXISTING BOLLARDS SPACED 6'-0" O.C. ALONG FRONT OF BUILDING
20. PROPOSED VAN EXIT CURB
21. PROPOSED BIKE RACKS
22. EXISTING RAMP WITH HANDRAILS
23. EXISTING LANDSCAPING AS REQUIRED BY CODE
24. PROPOSED CMU SCREENING WALL IN LOADING DOCK AREA, 12' HEIGHT
25. PROPOSED ASSOCIATES ENTRANCE
26. EXISTING STORMWATER MANAGEMENT AS REQUIRED BY CODE
27. PROPOSED EV CHARGER AND BOLLARDS AS REQUIRED PER CODE AND JURISDICTION
28. PROPOSED NEW VAN DOOR EXITS
29. PROPOSED HUB ENTRANCE
30. PROPOSED NEW VAN DOOR ENTRANCES
31. PROPOSED 8' HIGH PERIMETER METALLIC CHAIN LINK FENCE
32. EXISTING CMU WALL SEPARATION BETWEEN SITE AND RESIDENTIAL AREA
33. LEFT EXIT TURN ONLY FOR ASSOCIATES

**LEGEND**

- (#) PARKING COUNT
- ACCESSIBLE PATH OF TRAVEL

**CIRCULATION LEGEND**

- ASSOCIATE TRAFFIC FLOW DIRECTION
- DSP / FLEX TRAFFIC FLOW DIRECTION
- TRUCK TRAFFIC FLOW DIRECTION

Source: MG2 2021

# Operational Site Plan

Exhibit 3-2

*Amazon Delivery Station DAX9 Project*

N W E S

0 25 50 100 Feet

PSOMAS

(05/10/2021 MDM) R:\Projects\GRE\3GRE170100\Graphics\ex3-2_OperationalSitePlan.pdf

D:\Projects\3GRE\170100\GRAPHICS\ex_OperationalSitePlan_20210105.ai

**TABLE 3-1**
**DAILY VEHICLE OPERATIONS ONSITE**

| Time of Day | Vehicle Operations |
|---|---|
| Daytime | • Four (4) line-haul trucks would be entering and five (5) would be leaving the site between the hours of 7:00 AM and 7:00 PM from San Bernardino Road. |
| | • Forty (40) Associate cars and one hundred and twenty-seven (127) DSP drivers would be coming into the site between the hours of 7:00 AM and 7:00 PM. One hundred and six (106) Associates cars would be leaving the site between the hours of 7:00 AM and 7:00 PM. Associates would utilize the employee parking lot on the west side of the building. |
| | • One hundred and forty-two (142) vans would be leaving between the hours of 10:00 AM and 11:30 AM using the dedicated driveways on San Bernardino Road. |
| | • Forty-five (45) personal drivers (Flex) would be entering the site from Badillo Street, loading and leaving between 4:00 PM and 6:00 PM. |
| Evening | • Three (3) line-haul trucks would be entering and two (2) would be leaving the site from San Bernardino Road between the hours of 7:00 PM and 10:00 PM. |
| | • One hundred and forty-two (142) vans would be returning to the site and entering to park in the van parking area between the hours of 7:00 PM and 10:00 PM. |
| | • One hundred and twenty-seven (127) DSP drivers would be leaving the site in their personal vehicles between the hours of 7:00 PM and 10:00 PM. |
| Nighttime | • Seven (7) line haul trucks would be entering and leaving the site between the hours of 10:00 PM and 7:00 AM from San Bernardino Road. |
| | • There would be no van activities at nighttime. |
| | • Eighty-nine (89) Associate cars would be coming in and twenty- three (23) would be leaving the site between the hours of 10:00 PM and 7:00 AM. They would utilize the employee parking lot on the west side of the building. |

One hundred forty-two (142) delivery vans would load and depart from the station at a rate of 36 vans every 20 minutes to facilitate a regulated traffic flow into the surrounding area. The first wave of delivery vans would leave the station around 10:00 AM. The departure window is designed to mitigate impacts on rush hour periods. Approximately 8 to 10 hours after dispatch, delivery routes are then complete and the vans return to the station between 7:00 PM and 10:00 PM. After the check out and release of all delivery vehicles, delivery station Amazon associates prepare the delivery station for the next day's packages.

Amazon would also use Flex drivers to deliver packages from the Project site. Amazon anticipates approximately 45 traditional passenger vehicles entering the facility staggered between 4:30 PM and 6:00 PM. Flex Vehicles would load and depart every 15 minutes.

## 3.2 CONSTRUCTION PROGRAM

Property improvement activities are anticipated to occur over a 5- to 6-month timeframe and take place 5 days a week, in accordance with the City's permitted hours of construction.

## 3.3 DISCRETIONARY ACTIONS

This IS/MND is intended to serve as the primary CEQA environmental document for all actions associated with the proposed Project, including all other approvals beyond the City's authority needed to implement the Project. The following discretionary approvals are required for Project approval.

### 3.3.1 GENERAL PLAN LAND USE AMENDMENT NO. 20-03

The Project Applicant has filed for a General Plan Amendment (No. 20-3) to Industrial. The land use designation of Industrial permits intensive manufacturing, processing, warehousing and similar uses, as well as light, clean industries, and support offices. The designation also allows workplace-serving retail functions and work-live residences where such secondary functions would complement and be compatible with industrial uses. Industrial land uses are primarily composed of large-scale buildings. The designation also allows Transit Oriented Development, employment centers, or working villages with a mix of uses.

### 3.3.2 ZONE CHANGE NO. 20-03

The Project Applicant has filed for a Zone Change (No. 20-3) to Manufacturing (M-1). Per the City's Municipal Code Section 26-542, the purpose of the manufacturing zone is to classify and set standards for those industrial and incidental commercial facilities which are of moderate to heavy intensity and have no objectionable or obnoxious effect on any adjacent property. The developmental and operational standards are intended to provide compatibility with and protection to surrounding properties by minimizing traffic congestion, noise, glare, vibration, emission of odorous, toxic or noxious matter, and to provide adequate off-street parking, landscape buffering, and the proper placement of buildings.

### 3.3.3 PRECISE PLAN NO. 20-08

The Project Applicant has filed for a Precise Plan (No. 20-08), which must be approved for the site layout and architecture for the Project.

### 3.3.4 PARCEL MAP NO. 08344

The Project Applicant has filed a Parcel Map (No. 08344) in order to combine two existing lots into one.

### 3.3.5 TREE REMOVAL

A Tree Removal Permit must be approved for the removal of significant trees on-site, pursuant to Section 26-289 of the West Covina Municipal Code.

### 3.3.6 DEVELOPMENT AGREEMENT

The Project Applicant and the City of West Covina intend to enter into a Development Agreement under the authority of California Government Code section 65866 et seq. to vest applicants rights to development and to provide to City commitments for enhanced community benefits. No community benefits currently under consideration will include any changes to the environment beyond the scope of those contemplated in the other project entitlements referenced above.

### 3.3.7 MITIGATED NEGATIVE DECLARATION

In compliance with CEQA, the State CEQA Guidelines, the City of West Covina would adopt an MND, prior to approval of the Project. The MND serves as a finding that the Project would not have a significant effect on the environment, with the incorporation of mitigation measures, as appropriate.

### 3.3.8 MINISTERIAL APPROVALS

The following ministerial permits would be sought from the City of West Covina:

- Demolition Permit for site improvements;
- Grading Permit;
- Building Permits;
- Sign Permits;
- Occupancy Permits; and
- Encroachment Permit for driveway, sidewalk, and utility connections on adjacent streets.

The Project would require coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the State Water Resources Control Board (SWRCB). The Project would also require a demolition permit from the South Coast Air Quality Management District (SCAQMD).

*This page intentionally left blank*

# SECTION 4.0 ENVIRONMENTAL CHECKLIST

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

| | | |
|---|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology and Soils | ☐ Greenhouse Gas Emissions | ☒ Hazards and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☒ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☒ Mandatory Findings of Significance |

**DETERMINATION**: (To be completed by the Lead Agency.)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to be the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because al potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

| | |
|---|---|
| Signature | 07/08/2021<br>Date |
| Jo-Anne Burns<br>Printed Name | City of West Covina<br>For |

## EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

## 4.1 AESTHETICS

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

### Impact Analysis

#### *Existing Views and Visual Character*

The Project Site is developed, consisting of a centralized, single-story 177,440-sf industrial building. Paved surface parking lots extend throughout the eastern, southern, and western portions of the site. The north side of the industrial building consists of pedestrian walkways and ornamental and mature vegetation. Mature trees are located throughout the property and perimeter landscaping occurs along Badillo Street. Other features include perimeter fencing, parking lot light standards, and signage. Site access driveways are located along East San Bernardino Road and Badillo Street. Please refer to Exhibits 4-1, Existing Site Views, which provide photographs from several vantage points and depict the overall existing character of the site and adjacent areas.

#### *Would the Project:*

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

**Less Than Significant Impact.** The City of West Covina is located within the San Gabriel Valley, with the San Gabriel Mountains and San Bernardino Mountains located to the north and northeast of the Project site. Although the mountains can be viewed from the Project area, depending on the viewers vantage point, they are not considered scenic vistas by the City's General Plan. The San Jose Hills, located 4.8 miles southeast of the Project site, are identified as a scenic vista in the General Plan. Views of the San Jose Hills are not available from the Project area. Therefore, Project implementation would not adversely affect a scenic vista and impacts would be less than significant. No mitigation is required.

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

**No Impact**. According to the City's General Plan, there are no officially designated scenic highways within West Covina. The nearest officially designated scenic highway is a portion of Route 2, Angeles Crest Highway, located approximately 18 miles northwest of the Project site.

4-1a: From northern boundary on San Bernardino Road across from Cutter Way looking towards the southeast (Northwest Perspective).

4-1b: From the north looking across San Bernardino Road towards the southwest (Northeast Perspective).

4-1c: From the southeast on Badillo Street looking towards the north (Southeast Perspective).

4-1d: From the south looking across Badillo Street looking northeast (Southwest Perspective).

D:\Projects\3GRE\17\0100\GRAPHICS\ex_ExistingSiteViews_20210518.ai

## Existing Site Views

Exhibit 4-1

*Amazon Delivery Station DAX9 Project*

PSOMAS

(05/18/2021 MDM) R:\Projects\GRE17\3GRE170100\Graphics\ex4-1_ExistingSiteViews_20210518.pdf

State Route (SR) 57, between SR-91 and SR-60, located approximately two miles east of West Covina, is identified in the City's General Plan as Eligible for State Scenic Highway designation. In light of the site's distance from both Route 2 and SR-57, no impacts to State Scenic Highways would occur. Thus, the Project would not result in impacts to trees, rock outcroppings, and historic buildings within a state scenic highway. No mitigation is required.

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

**Less Than Significant Impact.** The Project site is developed, consisting of a centralized, single-story 177,440-sf industrial building and associated site improvements in an urban setting. Public views of the site exist from San Bernardino Road and Badillo Street. During short-term construction activities, views of the Project site may be of construction equipment; ongoing construction activities; short-term stockpiles of building materials and debris; and haul trucks delivering building materials and debris removal. Additionally, construction staging would occur within the Project's boundaries. These view conditions would be typical of a construction site within an urban environment and are considered temporary in nature. Project implementation would include tenant improvements to the existing building, new paved surfaces, new drought tolerant landscaping, signage, and fencing, all of which can be considered visual enhancements to the property over the existing condition. Changes to the Project site as a result of construction are not considered a degradation of the Project site or its surroundings. It should also be noted that per the above threshold, only "public" views of the site are considered in the analysis of potential impacts pertaining to degradation of the visual character or quality of the site. There are no other public vantage points such as from public parks and trails that would have views of the construction area. Only transient users (i.e., motorists and pedestrians) on the adjacent streets would have temporary views of the site.

The recent Faith Church operation occurred predominately on Sunday with weekday activities centered around an on-site school, administrative, and maintenance functions. The proposed Project would operate as package delivery center, operating seven days a week, 24 hours a day with the primary hours of increased traffic activity occurring between 10:00 AM to 10:00 PM. Therefore, the Project site would experience continuous daily activity, changing the visual character of the site. Proposed perimeter landscaping enhancements would serve as a visual buffer to on-site operations and activities and would reduce impacts to less than significant. Additionally, as indicated above, no views of the site from "public" vantage points would be available. Exhibit 4-2, Concept Renderings, provides view perspectives of the site, once site improvements are completed.

The Project would be required to comply with City's Municipal Code, Section 26-542, Manufacturing (M-1) Zone, which has requirements for design and operational standards, such as orientation of buildings and uses, air quality, parking, traffic generation, noise, vibration, glare, and landscaping (RR AES-1). Adherence to Section 26-542 M-1 of the Municipal Code would ensure that the design of the Project uses would be compatible with the surrounding land uses and the General Plan requirements. With approval of the Zone Change request for the Project, the proposal would not conflict with applicable zoning and would comply with City regulations in accordance with RR AES-1. Impacts would be less than significant, and no mitigation is required.

4-2a: Northwest Perspective.

4-2b: Northeast Perspective.

4-2c: Southeast Perspective.

4-2d: Southwest Perspective.

D:\Projects\3GRE\170100\GRAPHICS\ex_ConceptRenderings_20210510.ai

# Concept Renderings

Exhibit 4-2

*Amazon Delivery Station DAX9 Project*

PSOMAS

(05/10/2021 MDM) R:\Projects\GRE17\3GRE170100\Graphics\ex4-2_ConceptRenderings_20210510.pdf

***d) 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 in an urban environment that is subject to existing ambient lighting from adjacent roadways and existing surrounding uses. The existing light sources include exterior building lights, parking lot light poles/standards, and interior building lights. Site improvements would include new and upgraded light sources throughout the Project site. This would change lighting levels on-site but would be consistent with the ambient and night-time typical for the M-1 zoning in an urban environment.

The City's Municipal Code regulates lighting to ensure that sensitive land uses are not affected by lighting associated with developments. Section 26-519 of the City's Municipal Code requires that "all lighting of the building, landscape, parking area, or similar facilities shall be hooded and directed to reflect away from adjoining properties". This is generally accomplished with shielding and directional lighting methods. The proposed shields are simple shutters around the Light-Emitting Diode (LED's) that limit light thrown backwards. Lighting around the perimeter of the property includes house-side shields, with the exception of entrances/exits on the south side of the property. With proper installation and shielding pursuant to City Code requirements, impacts associated with new lighting would be less than significant, and no mitigation is required.

Glare is a common daytime phenomenon and is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. As indicated above in Threshold 4.1(c), the proposed Project would operate as package delivery center, operating seven days a week, 24 hours a day. Compared to the recent church operations, glare may increase primarily due to vehicles used for the delivery operations.

The existing vegetation, coupled with the Applicants intent to provide enhanced buffering along the easterly property line, especially where potential "gaps" currently exist, would reduce lighting and glare impacts to less than significant. Additionally, the proposed building improvements would retain the existing materials and finish which is primarily composed of non-reflective materials such as concrete on the exterior facade. The use of glass would be confined to windows and is not such that would generate substantial glare affecting surrounding uses. Impacts would be less than significant, and no mitigation is required.

**Regulatory Requirements**

**RR AES-1** Project design would be required to comply with Section 26-26-542, Manufacturing (M-1) Zone, of the West Covina Municipal Code. The City shall review and approve the Project's design and operational plans, with consideration to elements including, but not limited to, orientation of buildings and uses, air quality, parking, traffic generation, noise/vibration, glare, and landscaping.

**RR AES-2** Exterior lighting for the Project shall be designed and constructed in compliance with Section 26.519, Lighting, of the West Covina Municipal Code.

**Mitigation Measures**

Project implementation would not result in significant impacts related to aesthetics; therefore, no mitigation measures are required.

## 4.2 AGRICULTURE AND FOREST RESOURCES

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])? | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

### Impact Analysis

***Would the Project:***

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

**No Impact.** The Project site is developed and located in an urbanized area. Based on a review of the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP 2020), there are no lands designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance on or near the Project site. Therefore, no impact would occur and no mitigation is required.

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

**No Impact.** According to PlanWC, the current General Plan Land Use designation is Civic: Public Institution. The site is not within a Williamson Act contract and would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impact would occur and no mitigation is required.

***c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?***

**No Impact.** Forest land does not exist on the Project site and the site is not zoned for forest or timberland use. The proposed Project would not conflict with existing zoning or cause rezoning of

forest land, pursuant to Public Resources Code Section 122220(g), timberland, pursuant to Public Resources Code Section 4526, or timberland zoned Timberland production, pursuant to Government Code Section 51104(g). Therefore, no impact would occur and no mitigation is required.

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

**No Impact.** As noted in section 4.2(c), forest land does not exist on-site and thus, there would not be a conversion of forest land to non-forest land. Therefore, no impact would occur and no mitigation is required.

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

**No Impact.** As has been previously noted in this section, the Project site is developed and located in an urbanized area of West Covina. The proposed Project does not involve converting Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impact would occur and no mitigation is required.

**Regulatory Requirements**

None required.

**Mitigation Measures**

Project implementation would not result in significant impacts related to agriculture and forest resources; therefore, no mitigation measures are required.

## 4.3 AIR QUALITY

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | ☐ | ☐ | ☒ | ☐ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |
| d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

### Air Quality Background Information and Regulatory Background

The U.S. Environmental Protection Agency (USEPA) defines seven "criteria" air pollutants, as described below. These pollutants are called criteria pollutants because the USEPA has established National Ambient Air Quality Standards (NAAQS) for the concentrations of these pollutants (USEPA 2021). The California Air Resources Board (CARB) has also established standards for the criteria pollutants, known as California Ambient Air Quality Standards (CAAQS), and the State standards are generally more restrictive than the NAAQS.

- Ozone ($O_3$) is a nearly colorless gas that is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight). Ground-level $O_3$ exposure can cause a variety of health problems, including lung irritation, wheezing, coughing, pain when taking a deep breath, and breathing difficulties during exercise or outdoor activities; permanent lung damage; aggravated asthma; and increased susceptibility to respiratory illnesses.
- Carbon monoxide (CO) is a colorless and odorless toxic gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions.
- Nitrogen oxides ($NO_x$) are yellowish-brown gases, which at high levels can cause breathing difficulties. $NO_x$ are formed when nitric oxide (a pollutant from internal combustion processes) combines with oxygen.
- Sulfur dioxide ($SO_2$) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- Particulate Matter 10 (PM10) and Particulate Matter 2.5 (PM2.5) refer to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. Particulate matter includes both aerosols and solid particles. An example of particulate matter is fugitive dust. Short-term exposure to high PM2.5 levels is associated with premature mortality and increased hospital admissions and emergency

room visits. Long-term exposure to high PM2.5 levels is associated with premature mortality and development of chronic respiratory disease. Short-term exposure to high PM10 levels is associated with hospital admissions for cardiopulmonary diseases, increased respiratory symptoms, and possible premature mortality.

The NAAQS and CAAQS are shown in Table 4-1.

**TABLE 4-1**
**CALIFORNIA AND FEDERAL AMBIENT AIR QUALITY STANDARDS**

| Pollutant | Averaging Time | California Standards | Federal Standards | |
|---|---|---|---|---|
| | | | Primary[a] | Secondary[b] |
| $O_3$ | 1 Hour | 0.09 ppm (180 µg/m$^3$) | — | — |
| | 8 Hour | 0.070 ppm (137 µg/m$^3$) | 0.070 ppm (137 µg/m$^3$) | Same as Primary |
| PM10 | 24 Hour | 50 µg/m$^3$ | 150 µg/m$^3$ | Same as Primary |
| | AAM | 20 µg/m$^3$ | — | Same as Primary |
| PM2.5 | 24 Hour | — | 35 µg/m$^3$ | Same as Primary |
| | AAM | 12 µg/m$^3$ | 12.0 µg/m$^3$ | 15.0 µg/m$^3$ |
| CO | 1 Hour | 20 ppm (23 mg/m$^3$) | 35 ppm (40 mg/m$^3$) | — |
| | 8 Hour | 9.0 ppm (10 mg/m$^3$) | 9 ppm (10 mg/m$^3$) | — |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m$^3$) | — | — |
| $NO_2$ | AAM | 0.030 ppm (57 µg/m$^3$) | 0.053 ppm (100 µg/m$^3$) | Same as Primary |
| | 1 Hour | 0.18 ppm (339 µg/m$^3$) | 0.100 ppm (188 µg/m$^3$) | — |
| $SO_2$ | 24 Hour | 0.04 ppm (105 µg/m$^3$) | — | — |
| | 3 Hour | – | — | 0.5 ppm (1,300 µg/m$^3$) |
| | 1 Hour | 0.25 ppm (655 µg/m$^3$) | 0.075 ppm (196 µg/m$^3$) | — |
| Lead | 30-day Avg. | 1.5 µg/m$^3$ | — | — |
| | Calendar Quarter | — | 1.5 µg/m$^3$ | Same as Primary |
| | Rolling 3-month Avg. | — | 0.15 µg/m$^3$ | |
| Visibility Reducing Particles | 8 Hour | Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe) | **No Federal Standards** | |
| Sulfates | 24 Hour | 25 µg/m$^3$ | | |
| Hydrogen Sulfide | 1 Hour | 0.03 ppm (42 µg/m$^3$) | | |
| Vinyl Chloride | 24 Hour | 0.01 ppm (26 µg/m$^3$) | | |

$O_3$: ozone; ppm: parts per million; µg/m$^3$: micrograms per cubic meter; PM10: respirable particulate matter 10 microns or less in diameter; AAM: Annual Arithmetic Mean; —: No Standard; PM2.5: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; mg/m$^3$: milligrams per cubic meter; $NO_2$: nitrogen dioxide; $SO_2$: sulfur dioxide; km: kilometer.

[a] *National Primary Standards:* The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

[b] *National Secondary Standards:* The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2016

CARB, a part of the California Environmental Protection Agency, is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research, sets the CAAQS (as shown in Table 3), compiles emission inventories, develops suggested control measures, oversees local programs, and prepares the State Implementation Plan (SIP). For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the SIP. CARB establishes emissions standards for (1) motor vehicles sold in California, (2) consumer products (e.g., hair spray, aerosol paints, barbecue lighter fluid), and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SoCAB), which includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs), which are included in the California SIP.

### *Existing Air Quality Conditions*

The nearest air quality monitoring to the Project site is the Azusa monitoring station. located approximately 3.25 miles north of the Project site. The monitoring data presented in Table 4-2, Air Quality Measurements at the Azusa Monitoring Station, were obtained from the CARB (CARB 2021). Pollutants measured at this monitoring station include $O_3$, PM10, PM2.5, Nitrogen Dioxide ($NO_2$), CO. Federal and State air quality standards are presented with the number of times those standards were exceeded.

**TABLE 4-2**
**AIR QUALITY MEASUREMENTS AT THE AZUSA MONITORING STATION**

| Pollutant | California Standard | National Standard | Year | Max. Level[a] | State Standard Days Exceeded[b] | National Standard Days Exceeded[b, c] |
|---|---|---|---|---|---|---|
| $O_3$ (1 hour) | 0.09 ppm | None | 2017 | 0.152 | 38 | 7 |
| | | | 2018 | 0.139 | 24 | 3 |
| | | | 2019 | 0.123 | 34 | 0 |
| $O_3$ (8 hour) | 0.070 ppm | 0.070 ppm | 2017 | 0.114 | 64 | 62 |
| | | | 2018 | 0.100 | 43 | 42 |
| | | | 2019 | 0.094 | 43 | 39 |
| PM10 (24 hour) | 50 µg/m$^3$ | 150 µg/m$^3$ | 2017 | 83.9 | 7/- | 0/0 |
| | | | 2018 | 78.3 | 10/59.2 | 0/0 |
| | | | 2019 | 90.3 | 4/24.0 | 0/0 |
| PM10 (AAM) | 20 µg/m$^3$ | None | 2017 | — | — | N/A |
| | | | 2018 | 32.0 | Yes | N/A |
| | | | 2019 | 27.9 | Yes | N/A |
| $NO_2$ (1 Hour) | 0.18 ppm | 0.100 ppm | 2017 | 0.065 | 0 | 0 |
| | | | 2018 | 0.070 | 0 | 0 |
| | | | 2019 | 0.059 | 0 | 0 |
| $NO_2$ (AAM) | 0.030 ppm | 0.053 ppm | 2017 | 0.015 | No | No |
| | | | 2018 | 0.014 | No | No |
| | | | 2019 | 0.013 | No | No |
| PM2.5 (24 Hour) | None | 35 µg/m$^3$ | 2017 | 24.9 | N/A | 0/0 |
| | | | 2018 | 41.8 | N/A | 1/3.0 |
| | | | 2019 | 70.3 | N/A | 1/3.0 |
| PM2.5 (AAM) | 12 µg/m$^3$ | 15 µg/m$^3$ | 2017 | — | — | — |
| | | | 2018 | 10.8 | No | No |
| | | | 2019 | 10.7 | No | No |

$O_3$: ozone; ppm: parts per million; PM10: respirable particulate matter with a diameter of 10 microns or less; µg/m$^3$: micrograms per cubic meter; AAM: annual arithmetic mean; $NO_2$: nitrogen dioxide; CO: carbon monoxide; PM2.5: fine particulate matter with a diameter of 2.5 microns or less

"—" indicates that the data are not reported or there is insufficient data available to determine the value. N/A indicates that there is no applicable standard.

[a] California maximum levels were used.
[b] For annual averaging times, a "Yes" or "No" response is given if the annual average concentration exceeded the applicable standard.
[c] PM is measured once every 6 days. Where 2 values are shown for PM10 and PM2.5, the first is for the measured value, and the second is the estimated value if monitored every day.

Source: CARB 2021.

Based on monitored air pollutant concentrations, the USEPA and the CARB designate an area's status in attaining the NAAQS and the CAAQS, respectively, for selected criteria pollutants. These attainment designations are shown in Table 4-3. As identified in Table 4-3, All of Los Angeles County is a nonattainment area for $O_3$, PM10, and PM2.5 for the State standards; a portion of the county, not including the Project site, is a nonattainment area for the $NO_2$ State standard. Los Angeles County is a nonattainment area for $O_3$, PM2.5, and lead for the federal standards; however, the lead designation does not affect the Project site.

**TABLE 4-3**
**ATTAINMENT STATUS OF CRITERIA POLLUTANTS**
**IN THE SOUTH COAST AIR BASIN**

| Pollutant | State | Federal |
|---|---|---|
| $O_3$ (1 hour) | Nonattainment | No standards |
| $O_3$ (8 hour) | Nonattainment | Nonattainment |
| $PM_{10}$ | Nonattainment | Attainment/Maintenance |
| $PM_{2.5}$ | Nonattainment | Serious Nonattainment |
| CO | Attainment | Attainment/Maintenance |
| $NO_2$ | Attainment/Nonattainment[b] | Attainment/Maintenance |
| $SO_2$ | Attainment | Attainment |
| Lead | Attainment | Attainment/Nonattainment[a] |
| All others | Attainment/Unclassified[c] | No standards |

$O_3$: ozone; $PM_{10}$: respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; $NO_2$: nitrogen dioxide; $SO_2$: sulfur dioxide

[a] Los Angeles County is classified nonattainment for lead; the remainder of the South Coast Air Basin is in attainment of the State and federal standards.

[b] The near-road portion of CA-60 in San Bernardino, Riverside, and Los Angeles Counties is classified as nonattainment for $NO_2$; the remainder of the South Coast Air Basin is in attainment of State standards.

[c] "Unclassified" designation indicates that the air quality data for the area are incomplete and do not support a designation of attainment or nonattainment.

Source: CARB 2021b, USEPA 2021b

## Sensitive Air Quality Receptors

Sensitive receptors include, but are not limited to, children, the elderly, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. These sensitive receptors include, but are not limited to, schools, parks, hospitals, high-density residential areas, and convalescent homes.

The nearest sensitive air quality receptors to the Project site are single family homes on the south side of Badillo Street, approximately 90 feet south of the Project site; multi-family residences (Lark Ellen Village) adjacent to the eastern Project site boundary; and multi-family residences on the north side of West San Bernardino Road, approximately 90 feet north of the Project site.

## Impact Analysis

### *Thresholds of Significance*

Appendix G of the State CEQA Guidelines states that the significance criteria established by the applicable air quality management district may be relied upon to make significance determinations. To estimate if a project may adversely affect the air quality in the region, the SCAQMD has prepared the *Air Quality Analysis Guidance Handbook* (SCAQMD CEQA Handbook) to provide guidance to those who analyze the air quality impacts of projects (SCAQMD 1993). The SCAQMD CEQA Handbook provides significance thresholds for both construction and operation of projects within the SCAQMD's jurisdictional boundaries. The SCAQMD recommends that projects be evaluated in terms of the quantitative thresholds established to assess both the regional and localized impacts of project-related air pollutant emissions. The SCAQMD CEQA Handbook states that any project in the SoCAB with daily emissions that exceed any of the identified significance thresholds may have an individually and cumulatively significant air quality impact. The City of West Covina uses the current SCAQMD thresholds to determine whether a

project would have a significant impact. These SCAQMD thresholds are identified in Table 4-4 *South Coast AQMD Air Quality Significance Thresholds*.

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

| **Mass Daily Thresholds[a]** | | |
|---|---|---|
| **Pollutant** | **Construction** | **Operation** |
| NOx | 100 lbs/day | 55 lbs/day |
| VOC | 75 lbs/day | 55 lbs/day |
| PM10 | 150 lbs/day | 150 lbs/day |
| PM2.5 | 55 lbs/day | 55 lbs/day |
| SOx | 150 lbs/day | 150 lbs/day |
| CO | 550 lbs/day | 550 lbs/day |
| Lead | 3 lbs/day | 3 lbs/day |
| **TACs, Odor, and GHG Thresholds** | | |
| TACs (including carcinogens and non-carcinogens) | Maximum Incremental Cancer Risk ≥ 10 in 1 million<br>Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)<br>Chronic & Acute Hazard Index ≥ 1.0 (project increment) | |
| Odor | Project creates an odor nuisance pursuant to South Coast AQMD Rule 402 | |
| GHG | 10,000 MT/yr $CO_2e$ for industrial facilities | |
| **Ambient Air Quality Standards for Criteria Pollutants[b, c]** | | |
| $NO_2$<br><br>1-hour average<br>annual arithmetic mean | The South Coast AQMD is in attainment; the Project is significant if it causes or contributes to an exceedance of the following attainment standards:<br><br>0.18 ppm (State)<br>0.03 ppm (State) and 0.0534 ppm (federal) | |
| PM10<br>24-hour average<br>annual average | <br>10.4 µg/m$^3$ (construction)[c] & 2.5 µg/m$^3$ (operation)<br>1.0 µg/m$^3$ | |
| PM2.5<br>24-hour average | <br>10.4 µg/m$^3$ (construction)[c] & 2.5 µg/m$^3$ (operation) | |
| $SO_2$<br>1-hour average<br>24-hour average | <br>0.25 ppm (State) & 0.075 ppm (federal – 99$^{th}$ percentile)<br>0.04 ppm (State) | |
| Sulfate<br>24-hour average | <br>25 µg/m$^3$ (State) | |
| CO<br><br>1-hour average<br>8-hour average | South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:<br><br>20.0 ppm (State) and 35 ppm (federal)<br>9.0 ppm (State/federal) | |
| Lead<br>30-day average<br>Rolling 3-month average | <br>1.5 µg/m$^3$ (State)<br>0.15 µg/m$^3$ (federal) | |

NOx: nitrogen oxides, lbs/day: pounds per day, VOC: volatile organic compound, PM10: respirable particulate matter with a diameter of 10 microns or less, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, SOx: sulfur oxides, CO: carbon monoxide, TACs: toxic air contaminants, GHG: greenhouse gases, MT/yr $CO_2e$: metric tons per year of carbon dioxide equivalents, $NO_2$: nitrogen dioxide, ppm: parts per million, µg/m$^3$: micrograms per cubic meter; South Coast AQMD: South Coast Air Quality Management District; $SO_2$: sulfur dioxide

[a] Source: South Coast AQMD CEQA Handbook (SCAQMD 1993)
[b] Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated
[c] Ambient air quality threshold is based on SCAQMD Rule 403

Source: SCAQMD 2019

***Would the Project:***

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

**Less Than Significant Impact.** CEQA requires a discussion of any inconsistencies between a project and applicable GPs and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the Proposed Project includes the SCAQMD's AQMP, as discussed above.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP". Strict consistency with all aspects of the plan is usually not required. A project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency, as discussed above:

> (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
>
> (2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both criteria are evaluated for the Project, as shown below.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed Project [thresholds 4.3(b) and 4.3(c), below)], construction and operation of the Project would not exceed the SCAQMD's CEQA thresholds of significance and consequently would not result in an increase in the frequency or severity of existing air quality violations nor cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emissions reductions in the AQMP. Therefore, the Project is consistent with the first criterion.

With respect to the second criterion, the proposed Project was assessed as to whether it would exceed the assumptions in the AQMP. The SCAQMD's current air quality planning document is the 2016 Air Quality Management Plan (2016 AQMP). The SCAQMD adopted the 2016 AQMP on March 3, 2017 (SCAQMD 2021). The 2016 AQMP is a regional and multi-agency effort among the SCAQMD, CARB, the Southern California Association of Governments (SCAG), and USEPA. The 2016 AQMP includes an analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. The purpose of the 2016 AQMP is to set forth a comprehensive program that would promote reductions in criteria pollutants, greenhouse gases, and toxic risk and efficiencies in energy use, transportation, and goods movement. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); updated emission inventory methods for various source categories; and SCAG's latest growth forecasts[1]. The 2016 AQMP includes strategies and measures necessary to meet the NAAQS. The AQMP is based on projections of energy usage and vehicle trips from land uses within the SoCAB.

The Project site is designated by the General Plan for Civic/Public Institution land use designation and involves a General Plan Amendment to the Industrial Land use designation. Because the Project would require that its existing land use be re-designated, the Project would not be consistent with the land use assumptions in the 2016 AQMP. However, the Civic/Public Institution

[1] It is noted that SCAG adopted the 2020–2045 RTP/SCS in September 2020 and that SCAQMD in the process of developing a 2022 AQMP.

land use designation would support the use of a library and/or a school. Trip generation for a high school in a 177,440 sf building is estimated at 2,287 weekday trips.[2] Trip generation for a library, per sf, is greater than for a high school. Daily trip generation for the proposed Project is estimated at 914 trips (NV5 2021b). Thus, the Project would have substantially less trips and associated air pollutant emissions than anticipated by the existing General Plan designation. The Project would not conflict with the site-related trip generation and emission assumptions in the RTP/SCS and the AQMP. As such, the Project would not result in emissions which conflict or obstruct with the AQMP or the RTP/SCS. Therefore, impacts would be less than significant and no mitigation is required.

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

**Less Than Significant Impact.** Los Angeles County is a nonattainment area for $O_3$, PM10, and PM2.5, as shown in Table 4-3, Attainment Status of Criteria Pollutants in the South Coast Air Basin.[3] The Project would generate PM10, PM2.5, and $O_3$ precursors (NOx and Volatile Organic Compounds [VOC]) during short-term construction and long-term operations.

***Construction Impacts***

Construction-Related Regional Impacts

A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

A project with daily emission rates below the SCAQMD's established air quality significance thresholds (shown in Table 4-4) would have a less than significant impact on regional air quality. Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program (CAPCOA 2016). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and County-specific information.

The CalEEMod input for construction emissions was based on the Project's construction assumptions (as detailed in Section 3.0, Project Description), Applicant input, engineering judgment, and CalEEMod default data. While most of the project construction would occur inside the existing building, some exterior site work would require the use of diesel-powered construction equipment. Both interior and exterior work would require the import of materials, the export of debris, and worker commute. It was assumed that the Project construction would start in November 2021 and be completed in June 2022.

Table 4-5, Estimated Maximum Daily Construction Emissions, presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown in Table 4-5, all criteria pollutant emissions would be below the SCAQMD's respective thresholds.

[2] Trip rate based on CalEEMod default trip generation. The CalEEMod model is described under question 4.3(b).

[3] As stated above, the Los Angeles County nonattainment designations for $NO_2$ (State) and lead (federal) are not applicable for the Project site.

**TABLE 4-5**
**ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS**

| Year | Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** |
| 2021 | 2 | 14 | 15 | <1 | 2 | 1 |
| 2022 | 61 | 13 | 15 | <1 | 2 | 1 |
| *SCAQMD Thresholds (Table 4-1)* | *75* | *100* | *550* | *150* | *150* | *55* |
| **Exceeds SCAQMD Thresholds?** | **No** | **No** | **No** | **No** | **No** | **No** |

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Source: SCAQMD 2019 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod model outputs.

Cumulative Construction Impacts

Construction activities associated with the proposed Project would result in less than significant construction-related regional and localized air quality impacts, as quantified above in Table 4-5, Estimated Maximum Daily Construction Emissions, and Table 4-7, Localized Significance Threshold Construction Emissions (discussed under Threshold 4.3(c)), respectively. Short-term cumulative impacts related to air quality could occur if construction of the Project and other projects in the surrounding area were to occur simultaneously. In particular, with respect to local impacts, the consideration of cumulative construction particulate (i.e., PM10 and PM2.5) impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of: (1) the combination of the short range (distance) of particulate dispersion (especially when compared to gaseous pollutants) and (2) the SCAQMD's required dust-control measures, which further limit particulate dispersion from the Project site.

SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SCAQMD 2003). Because the Project's construction emissions are below the SCAQMD's regional and local significance thresholds, local construction emissions would not be cumulatively considerable, and the impact would be less than significant. No mitigation is required.

### *Operational Impacts*

Operational emissions associated with the Project are comprised of area, energy, and mobile source emissions. The principal source of VOC emissions would result from the use of consumer products; the primary source of all other pollutant emissions would be vehicle trips. Area and energy source emissions are based on CalEEMod assumptions for the specific land uses and size. Mobile source emissions are based on estimated Project-related trip generation forecasts, as contained in the Project traffic impact analysis. The Project would generate an estimated 914 daily trips. The peak day operational emissions for VOC, NOx, CO, $SO_x$, PM10, and PM2.5 daily emissions that would result from the Project's long-term operation have been calculated and are summarized below in Table 4-6, Peak Daily Operational Emissions.

**TABLE 4-6**
**PEAK DAILY OPERATIONAL EMISSIONS**

| Source | Emissions (lbs/day)* | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** |
| Area sources | 4 | <1 | <1 | <1 | <1 | <1 |
| Energy sources | <1 | <1 | <1 | <1 | <1 | <1 |
| Mobile sources | 2 | 8 | 36 | <1 | 8 | 2 |
| **Total Operational Emissions*** | **6** | **8** | **36** | **<1** | **8** | **2** |
| *SCAQMD Significance Thresholds (Table 4-4)* | *55* | *55* | *550* | *150* | *150* | *55* |
| **Significant Impact?** | **No** | **No** | **No** | **No** | **No** | **No** |

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

* Some totals do not add due to rounding.

Source: SCAQMD 2019 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod model outputs.

The data provided in Table 4-6 shows that none of the analyzed criteria pollutants would exceed the regional emissions operational thresholds. It should be noted that the operational emissions shown in Table 4-6 are an overestimate because no reduction has been taken for the existing emissions. Because Project related emissions would be less than the significance thresholds, a less than significant regional air quality impact would occur from operation of the Project. No mitigation is required.

Cumulative Operational Impacts

As shown in Table 4-6, Peak Daily Operational Emissions, and Table 4-8, Localized Significance Thresholds Operational Emissions (under Threshold 4.3(c), below) operational emissions of VOC, $NO_x$, CO, $SO_x$, PM10, and PM2.5 would be below the SCAQMD CEQA significance thresholds. Consistent with the approach described above (under Cumulative Construction Impacts), SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant. Therefore, because the Project's operational emissions are less than the respective SCAQMD daily operational thresholds, the Project's operations phase activities would not contribute to a cumulatively considerable net increase of a pollutant for which the SoCAB is in nonattainment. Emissions of nonattainment pollutants or their precursors would not be cumulatively considerable and would be less than significant. No mitigation is required.

### *Cumulative Health Impacts*

The SoCAB is designated as nonattainment for $O_3$, PM10, and PM2.5, which means that the background levels of those pollutants are, at times, higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (the elderly, children, and the sick). Therefore, when the concentrations of those pollutants exceed the standard, it is likely that some sensitive individuals in the population would experience health effects. These health effects are not identified for specific individual receptors nor does the analysis identify the magnitude of health effects. The regional analysis detailed above found that the Project would not exceed the SCAQMD regional significance thresholds for VOC and NOx (ozone precursors), PM10, and PM2.5. As such, the Project would result in a less than significant cumulative health impact. No mitigation is required.

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

**Less Than Significant Impact.** A significant impact may occur when a project generates pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for emissions from construction and operation of the proposed Project. To address construction activities, the analysis below includes the following analyses: localized air quality impacts from construction and toxic air contaminants (TACs), specifically diesel particulate matter (DPM) from on-site construction, and asbestos and exposure to lead-based paint during demolition activities. To address operational emissions exposure to sensitive receptors, the analysis below discusses local air quality impacts from on-site operations and CO hotspots. Operational, long-term TACs may be generated by some industrial land uses; commercial land uses (e.g., gas stations and dry cleaners); and diesel trucks on freeways. Warehouse uses generate toxic emissions associated with diesel exhaust from trucks accessing the site. The Project is anticipated to result in 14 (28 one-way truck trips) per day. The California Air Resources Board has published the *Air Quality and Land Use Handbook: A Community Health Perspective* which recommends that residential uses be sited at least 1,000 feet from a warehouse distribution center that accommodates 100 trucks per day. Because the Project would accommodate less than 100 trucks per day, the Project would be below the CARB's siting recommendation for sensitive land uses and not expose local residents to excessive toxic emissions.

#### *Construction*

Localized Criteria Pollutants from On-Site Construction

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term local impacts to nearby sensitive receptors from on-site emissions of NOx, CO, PM10, and PM2.5 are examined based on SCAQMD localized significance threshold (LST) methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts. The emissions limits in the lookup tables are based on the ambient air quality standards and SCAQMD's applicable rules at the time (SCAQMD 2008).

For the purposes of an LST analysis, the SCAQMD considers receptors where it is possible that an individual could remain for 1 hour for $NO_2$ and CO exposure and 24 hours for PM10 and PM2.5 exposure. The closest receptors to the Project site are single family uses adjacent to the Project's northern, southern, and eastern boundaries. Individuals at these residences were evaluated for exposure for 1 hour and 24 hours. The emissions thresholds are for receptors within 25 meters (82 feet) of the Project site; the thresholds for receptors farther away would be higher, and the Project emissions would be a smaller fraction of the thresholds.[4]

Table 4-7, Localized Significance Threshold Construction Emissions, shows the maximum daily on-site emissions for construction activities compared with the SCAQMD LSTs with receptors within 25 meters for a Project site area of 1 acre, which are the most conservative thresholds. As shown in Table 4-7, the localized emissions from the Project would be below the thresholds, and no significant impacts would result to sensitive receptors. No mitigation is required.

[4] When receptors are closer than 25 meters, the 25-meter table values are to be used.

**TABLE 4-7**
**LOCALIZED SIGNIFICANCE THRESHOLD CONSTRUCTION EMISSIONS**

| Emissions and Thresholds | Emissions (lbs/day) | | | |
|---|---|---|---|---|
| | NOx | CO | PM10 | PM2.5 |
| Project maximum daily on-site emissions | 13 | 11 | 1 | 1 |
| **SCAQMD Localized Significance Threshold[a]** | **83** | **673** | **5** | **4** |
| **Exceed threshold?** | **No** | **No** | **No** | **No** |

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

[a] Data is for SCAQMD Source Receptor Area 11, South San Gabriel Valley, 25-meter distance, 1 acre.

Source: SCAQMD 2009 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod outputs.

Toxic Air Contaminant Emissions from On-Site Construction

Construction activities would result in short-term, project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation; paving; building construction; and other miscellaneous activities. CARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments—which determine the exposure of sensitive receptors to TAC emissions—should be based on a 40-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Project.

There would be relatively few pieces of off-road, heavy-duty diesel equipment in operation, and the total construction period of approximately six months would be relatively short when compared to a 40-year exposure period. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations, construction emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The impact would be less than significant, and no mitigation is required.

### *Exposure to Asbestos and Lead Paint During Demolition*

Exposure of persons to asbestos-containing materials (ACM) and lead-based paint (LBP) during demolition is addressed in Section 4.9, Hazards and Hazardous Materials, of this IS/MND. The buildings on-site contain ACM and LPB, per the Limited Asbestos Inspection Report and Lead-Based Paint/Ceramic Tile Inspection Reports, included as appendices to this IS/MND (Appendix E2). The demolition of these materials would then be handled in accordance with applicable regulations (RR HAZ-1 through RR HAZ-3). The impacts would be less than significant, and no mitigation is required.

### *Operational*

Localized Criteria Pollutants from On-site Operations

Project-related air emissions may have the potential to exceed the State and federal air quality standards in the vicinity of the Project even though these pollutant emissions may not be significant enough to create a regional impact to the SoCAB. Project-related air emissions from

on-site sources such as landscaping equipment, and on-site usage of natural gas appliances may have the potential to generate emissions that exceed the State and federal air quality standards in the vicinity of the Project even though these pollutant emissions may not be significant enough to create a regional impact to the SoCAB.

The local air quality emissions from on-site operations were analyzed using the SCAQMD's Mass Rate LST Look-up Tables and the LST Methodology. Table 4-8, Localized Significance Threshold Operational Emissions, shows the on-site operational emissions from area sources, energy usage, vehicles operating on-site, and the calculated emissions thresholds.

**TABLE 4-8**
**LOCALIZED SIGNIFICANCE THRESHOLD OPERATIONAL EMISSIONS**

| On-Site Emission Source | Pollutant Emissions (pounds/day) | | | |
|---|---|---|---|---|
| | **NOx** | **CO** | **PM10** | **PM2.5** |
| Area Sources | <1 | <1 | <0.05 | <0.05 |
| Energy Sources | <1 | <1 | <0.05 | <0.05 |
| Mobile Sources[a] | <1 | <1 | 0.41 | 0.11 |
| Project's total maximum daily on-site emissions | **<1** | **<1** | **0.42** | **0.12** |
| **SCAQMD Localized Significance Threshold[b]** | **83** | **673** | **1** | **1** |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** |

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

[a] On-site vehicle emissions based on 5% of the gross vehicular emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the Project site.

[b] Data is for SCAQMD Source Receptor Area 11, San Gabriel Valley, with a source receptor distance of 25-meters, 1 acre..

Source: SCAQMD 2009 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod outputs.

The data provided in Table 4-8 shows that the ongoing operations of the Project would not exceed the local $NO_x$, CO, PM10, and PM2.5 thresholds of significance. As stated above, the operational emissions shown in Table 4-6 are an overestimate because no reduction has been taken for the existing emissions. Therefore, operation of the Project would create a less than significant impact related to Project related local contributions to air quality at sensitive receptors, and no mitigation is required.

Carbon Monoxide Hotspot

In an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations generally are found close to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (e.g., congested intersection) increases. Localized areas where ambient concentrations exceed federal and/or State standards for CO are termed CO "hotspots". According to the *Transportation Project-Level Carbon Monoxide Protocol* (the Protocol), projects may worsen air quality if they worsen traffic flow, defined for signalized intersections as increasing average delay at intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the Project, to operate at LOS E or F with the Project (UCD ITS 1997). If impacts are less than significant close to congested intersections, impacts also would be less than significant at more distant sensitive-receptor and other locations.

The Project Traffic Impact Study identified one signalized intersection, Badillo Street at Azusa Avenue, that would operate at LOS E in the AM peak hour with increased volume-to-capacity under Build conditions when compared to No-Build conditions (NV5 2021b).

The 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (SCAQMD 2003b) evaluated numerous intersections for the potential to result in CO hotspots and found that the 1-hour CO standard (20.0 parts per million [ppm]) would likely not be exceeded until the daily traffic at the intersection exceeded more than 40,000 vehicles per day. Based on data in the Project traffic and noise analyses, average daily traffic on Badillo Street would be approximately 19,000 vehicles per day and approximately 26,000 vehicles per day on Azusa Avenue (NV5 2021, 2021b). Therefore, CO concentrations at the intersection would be substantially less than the CO ambient air quality standards. Moreover, vehicle standards have become increasingly more stringent since 1992 and background CO concentrations are less than in 1992. As such, the small contribution of Project related traffic would not result in CO concentrations that would exceed either the State or federal ambient air quality standards. The Project would result in less than significant impacts related to CO hotspots, and no mitigation is required.

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

**Less than Significant Impact.** Project construction would use equipment and activities that could result in other emissions (such as those leading to odors). However, these odors would be typical during construction and not extraordinarily objectionable. Potential construction odors include on-site construction equipment's diesel exhaust emissions as well as roofing, painting, and paving operations. There may be situations where construction activity odors could be noticed. However, these odors would be temporary and would dissipate rapidly from the source with an increase in distance. These odors would not be of such magnitude to cause a public nuisance. Therefore, the impacts would be short-term; would not affect a substantial number of people; and would be less than significant.

According to the SCAQMD CEQA Handbook, land uses associated with odor complaints typically include agricultural uses, sewer treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Project does not include any uses identified by the SCAQMD as being associated with odors, and therefore, would not likely produce objectionable odors. In addition, the Project uses are regulated from nuisance odors or other objectionable emissions by SCAQMD Rule 402, Nuisance. Rule 402 prohibits discharge from any source of air contaminants or other material which would cause injury, detriment, nuisance, or annoyance to people or the public. Overall, there would be a less than significant impact, and no mitigation is required.

**Regulatory Requirements**

**RR AQ-1** All construction activities shall be conducted in compliance with South Coast Air Quality Management District's Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Contractor compliance with Rule 403 requirements shall be mandated in the contractor's specifications.

**RR AQ-2** All construction activities shall be conducted in compliance with South Coast Air Quality Management District Rule 402, Nuisance, which states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such

persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property".

**Mitigation Measures**

Project implementation would not result in significant impacts related to air quality; therefore, no mitigation measures are required.

## 4.4 BIOLOGICAL RESOURCES

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

### Impact Analysis

This section describes the existing biological resources of the Project site and surrounding area. The general environs of the City of West Covina (i.e., the San Gabriel Valley) once comprised sprawling native grasslands that connected to the San Gabriel Mountains to the north and the Puente Hills to the east. While the local mountains still support extensive native vegetation and habitat for native animals, the City itself and surrounding communities are largely urbanized with only isolated areas that support remnant native vegetation.

***Would the Project:***

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

**No Impact.** The Project site is developed and located within an urban area surrounded primarily by industrial, commercial and residential uses. Only ornamental landscaping (i.e. mature trees, shrubs and vegetation) and weedy species are present. The Project site's landscaping provides potential habitats for common animal species that are typically found in urban areas, such as small mammals, birds, small reptiles, and insects. However, the site does not provide natural

habitats for sensitive plant and animal species. Further, the site contains no native vegetation or habitat as depicted in the General Plan EIR Figure 4.3-1, Vegetation Communities (West Covina 2016b) and is not located in an area identified for Special Status Species within the City, as depicted in the General Plan EIR Figure 4.3-2, Special Status Species (West Covina 2016b). Review of the U.S. Fish and Wildlife Service's (USFWS') Critical Habitat for Threatened and Endangered Species shows there are no designated critical habitat areas on or near the site. The nearest critical habitat is located in Galster Park, located approximately 3.3 miles to the southeast. Therefore, the site does not provide natural habitats for sensitive plant and animal species.

Since there are no native or sensitive biological resources on the Project site, the proposed Project also would not impact any candidate, sensitive, or special status species, as identified in the local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or the USFWS. There would be no impact, and no mitigation is required.

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

**No Impact**. The Project site is developed with a former industrial building, paved surface parking lots, and walkways. Only ornamental landscaping (i.e. mature trees, ornamental shrubs and vegetation) and weedy species are present. No riparian habitat or sensitive communities identified in local or regional plans or policies by the CDFW or by the USFWS are located on the Project site. There would be no impact to riparian habitats or sensitive natural vegetation communities, and no mitigation is required.

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

**No Impact**. The site does not have any water bodies, drainage, and does not support State or federally protected wetlands as defined by Section 404 of the Clean Water Act, or other areas under the jurisdiction of the CDFW, the Regional Water Quality Control Board, or U.S. Army Corps of Engineers (USACE). There would be no impact to marsh, vernal pool, or coastal habitats, and no mitigation is required.

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

**No Impact**. The Project site is within a developed urban area, surrounded by residential, commercial, and industrial uses and lacks connectivity to natural open space areas. Further, the Project site is not within any regionally or locally recognized wildlife movement corridors. The nearest potential wildlife corridor (approximately five miles southeast of the site) is the Puente Hills to Puddingstone Reservoir, which passes through the eastern portion of the City, in the San Jose Hills (West Covina 2016b). Additionally, according to PlanWC and the associated EIR, this portion of the City, including the proposed Project site, does not contain known native wildlife nursery sites (West Covina 2016a, 2016b). Therefore, the Project site does not function as a wildlife movement corridor or a wildlife nursery site. No impact would occur, and no mitigation would be required.

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

**Less than Significant with Mitigation Incorporated.** The proposed Project would involve removal of ornamental trees and replacing the existing landscaping with a variety of drought tolerant trees and vegetation. More specifically, three 25- foot tall ficus trees would require removal in order to accommodate the relocation of the westerly driveway to align with Cutter Way. The Project would be required to comply with Chapter 26, Article XIV, Division 1, Water Efficient Landscaping, of the West Covina Municipal Code (RR BIO-1). A tree inventory was prepared for the property by Carlberg Associates (Carlberg) in 2020 and is included in Appendix B of this IS/MND. The tree report evaluated a total of 210 trees and palms — of which 114 are proposed to be removed and 96 preserved in place. The report was prepared in accordance with West Covina's Municipal Code, Chapter 26, Division 9: "Preservation, Protection, and Removal of Trees" and the requirements set forth for an arborist report. The report indicates there are no California native trees on the property; no City rights-of-way trees associated with the property; and no off-site trees whose canopies overhang into the site. Therefore, the Project would not conflict with City regulations in this regard. Impacts would be less than Significant and no mitigation is required.

On-site trees and large shrubs may provide some nesting or roosting opportunities for migratory birds or raptors, which could be impacted during construction. Compliance with the Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, 3511, and 3513 of the *California Fish and Game Code*, as outlined in MM BIO-1, would ensure that potential impacts to nesting birds and raptors would be less than significant.

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

**No Impact**. The proposed Project site is in a highly urbanized region and not within any established Habitat Conservation Plan, Natural Community Conservation Plan, or other approved type of habitat conservation plan (West Covina 2016b). No impact would occur and no mitigation is required.

**Regulatory Requirements**

**RR BIO-1** The proposed on-site and off-site trees shall be planted, preserved, removed, replaced, and/or maintained in accordance with Chapter 26, Article XIV, Division 1, Water Efficient Landscaping, and Chapter 26, Article VI, Division 9, Preservation, Protection and Removal of Trees, of the West Covina Municipal Code.

**Mitigation Measures**

**MM BIO-1** Prior to the issuance of any grading/development permits, the Community Development Director or designee shall verify that the following requirements for nesting birds and preconstruction survey are completed by the Project Applicant:

- The start of site-preparation activities and subsequent construction activity initiation shall be scheduled outside of the bird nesting and breeding season (typically March 1 through August 15). If site-preparation activities start during the nesting season, a qualified Biologist shall conduct a nesting bird survey in potential bird nesting areas within 200 feet of any proposed

disturbance. The survey shall be conducted no more than three days prior to the start of any ground disturbance activities.

- If active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) and/or the California Fish and Game Code are present in the impact area or within 200 feet of the impact area, a temporary buffer shall be established a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the Biologist.
- Clearing and/or construction activities within buffer areas shall be postponed or halted until the nest is complete (ex. juveniles have fledged from the nest and there is no evidence of a second nesting attempt) as determined by a qualified Biologist.

## 4.5 CULTURAL RESOURCES

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | ☐ | ☒ | ☐ | ☐ |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☒ | ☐ |

### Impact Analysis

This section is based upon existing references available from the City of West Covina, including the City's General Plan and available environmental review documents for the local area.

***Would the Project:***

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

**No Impact**. The National Register of Historic Places (NRHP) Database does not identify historic resources in the City. However, there are five properties within ½-mile of the Project site that the City has previously recommended nomination to the California Register of Historical Places (West Covina 2016a). The recorded properties include 747 North Lark Ellen Avenue, located .018-mile to the southeast; 1032 East Puente Avenue located, 0.31-miles to the southwest; 1038 East Puente Avenue, located 0.29-miles to the south; 1314 East Puente Avenue, located 0.29-miles to the south; and 611 North Vincent Avenue, located 0.40-miles to the southwest of the Project site.

The proposed Project involves onsite tenant improvements to the existing structure, re-surfacing of parking lots, landscaping upgrades, and related improvements. The Project does not include large scale grading or subsurface excavation, causing substantial alteration of the site. Therefore, the Project would not have any direct or indirect impacts to the sites listed above. Thus, no impacts to historical resources would result from Project implementation, and no mitigation is required.

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

**Less than Significant With Mitigation Incorporated.** The NRHP Database found no archaeological resources in the City. Buried historical and/or archaeological materials have the potential to be uncovered during ground-disturbing activities. The proposed Project involves a developed site, proposing tenant improvements to the existing structure and surface parking lots and would not involve substantial ground/subsurface alteration or planned grading. However, to ensure no significant impacts would result, MM CUL-1 is proposed which calls for a qualified Archaeologist to monitor, if large areas of earth-moving activities are to occur. The measure applies specifically to earthwork activities and sets procedures to follow in the event of the discovery of archaeological resources. Implementation of MM CUL-1 would reduce the potential for the destruction of any significant archaeological resources less than significant.

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

**Less than Significant Impact.** The Project site is developed and the proposal involves tenant improvements for the existing structure and surface parking lots and is not anticipated to involve substantial alteration of the site. However, in compliance with State and federal regulations, if human remains are encountered during excavation activities, all work shall halt at the site and or any nearby areas reasonably suspected to overlie adjacent remains, and the County Coroner shall be notified (RR CUL-1). The Coroner shall determine whether the remains are of forensic interest within two working days of receiving notification. If the Coroner, with the aid of the qualified archaeologist, determines that the remains are prehistoric, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours of the determination. The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the California Public Resources Code. Compliance with RR CUL-1 would ensure that impacts on human remains would be less than significant. No mitigation is required.

**Regulatory Requirements**

**RR CUL-1** If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code.* The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner.

**Mitigation Measures**

**MM CUL-1** A qualified archaeologist (the “Project Archaeologist”) shall be retained prior to the start of any large scale earthwork activities related to Project construction. The Project Archaeologist shall monitor all ground-disturbing activities within the areas of native soil (i.e., below existing areas of artificial fill from previous construction). If archaeological or historical resources are encountered during implementation of any phase of the Project, the Project Archaeologist shall be allowed to temporarily divert or redirect excavation activities in the vicinity of the find in order to make an evaluation of the find.

## 4.6 ENERGY

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☐ | ☒ |

Energy efficiency is a priority for both the State of California and the City of West Covina. The following are regulatory targets and requirements that have been adopted at the State and local level.

### State

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the CCR) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The current 2019 Standards, effective January 1, 2020, are projected to result in a 30 percent improvement in energy efficiency for nonresidential buildings over the 2016 standards (CEC 2018). Although the Project does not include new buildings, the standards include requirements for building alterations and repairs, including outdoor lighting.

The 2019 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for hotel, retail, office, public schools and hospitals) throughout California (CBSC 2019). The development of the CALGreen Code is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the following construction practices: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality (CBSC 2019). In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

### City of West Covina

The City of West Covina has adopted an Energy Action Plan (EAP) to address environmental and fiscal impacts associated with energy consumption. The EAP was developed to guide the City toward attainable conservation goals that would reduce the impact of GHG emissions within the community. These conservation goals include the following:

- Educating the public about energy saving techniques and programs;
- Promoting and creating energy conservation opportunities and programs;
- Installing environmentally benign, renewable and reliable energy facilities;
- Participating in alliances with local businesses and with other agencies;
- Pursuing and performing local and higher funding opportunities; and

- Coordinating other City policies, programs, and ordinances to become compatible with Sustainable Community goals.

**Impact Analysis**

***Would the Project:***

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

**Less than Significant Impact.**

**Construction.** Project Construction-related energy demand includes energy and fuel used by construction equipment, construction worker vehicles, and construction vendor/hauling vehicles. The construction equipment, use of electricity, and fuel for the Project would be typical for building renovation, minor additions, and parking lot construction because there are no aspects of the proposed construction process that are unusual or energy intensive. Construction equipment would conform to applicable CARB emissions standards, which promote equipment fuel efficiencies. Construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Gasoline and diesel fuel would be supplied by local and regional commercial vendors. It should be noted that fuel efficiencies are improving for on- and off-road vehicle engines due to more stringent government requirements. Construction energy consumption would represent a "single-event" demand and would not require ongoing or permanent commitment of energy resources. The Project would also not necessitate the use of construction equipment or processes that are less energy efficient than at comparable construction sites. Thus, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

**Operations.** The Project Traffic Impact Study evaluated the Project's vehicle miles travelled (VMT) according to the San Gabriel Valley Council of Governments' (SGVCOG) methods and the City of West Covina's criteria for VMT per service population (NV5 2021b). The study shows that the Project VMT per service population would be less than without the Project. The Traffic Impact Study also compares VMT from current delivery stations and from the proposed Project. The Project would result in 730 fewer regional delivery VMT per day. These VMT reductions would result in reduced fuel use and energy conservation.

Renovation of the warehouse building would conform to the applicable requirements of the California Building Code, including the Energy Efficiency Standards and the Green Building Standards, thereby improving the energy efficiency of the building and the Project site. Operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. No impact would occur and no mitigation is required.

***b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

**No Impact.** The Project would be required to comply with the State of California's Title 24 Building Standards and Title 24 Energy Efficiency Standards (RR ENE-1). Because the Project would comply with the latest energy efficiency standards and would incorporate renewable energy, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impact would occur and no mitigation is required.

## Regulatory Requirements

**RR ENE-1** The Project must be designed in accordance with the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) and the Title 24 Green Building Standards Code (CALGreen), (CCR, Title 24, Part 11). These standards are updated, nominally every three years, to incorporate improved energy efficiency technologies and methods.

## Mitigation Measures

Project implementation would not result in significant impacts related to energy; therefore, no mitigation measures are required.

## 4.7 GEOLOGY AND SOILS

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? | ☐ | ☐ | ☐ | ☒ |
| ii) Strong seismic groundshaking? | ☐ | ☒ | ☐ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☐ | ☒ |
| iv) Landslides? | ☐ | ☐ | ☐ | ☒ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | ☐ | ☒ | ☐ | ☐ |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | ☐ | ☒ | ☐ | ☐ |
| e) 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? | ☐ | ☐ | ☐ | ☒ |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☒ | ☐ | ☐ |

### Impact Analysis

Analysis for this section was prepared using the PlanWC EIR (West Covina 2016a) and a Geotechnical Study prepared by Kleinfelder (Kleinfelder 2020), dated November 13, 2020, for the proposed Project. The Kleinfelder report assesses geotechnical conditions on the site and provides structural design recommendations for the construction. The findings of the PlanWC EIR and Geotechnical Study are summarized below. The Kleinfelder report is included as Appendix D of this IS/MND.

***Would the Project:***

***a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?***

**No Impact.** Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely along active faults, and typically occurs during earthquakes of magnitude five or higher. Ground rupture only

affects the area immediately adjacent to a fault. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy.

The Project site is outside of an Earthquake Fault Zone and the Alquist-Priolo Earthquake Fault Zoning Map area. Therefore, the potential for surface rupture at the Project site is low and the Project would not result in a substantial adverse effect, including the risk of loss, injury, or death, due to a Alquist-Priolo Earthquake Fault. No impact would occur, and no mitigation is required.

***ii) Strong seismic groundshaking?***

**Less than Significant with Mitigation Incorporated.** Southern California is considered a seismically active region. Moderate to strong earthquakes can occur on numerous local faults. Southern California faults are classified as active, potentially active, or inactive.

There are no known active or potentially active faults on the Project site. However, it is anticipated that because the Project site is located within a seismically active region, the site would experience ground shaking in the future.

In order to reduce the effects of ground shaking, the Project is expected to be designed in accordance with all applicable current codes and standards utilizing the appropriate seismic design parameters to reduce seismic risk as defined by California Geological Survey (CGS) Chapter 2 of Special Publication 117a and the 2019 California Building Code (CBC) (RR GEO-1). All tenant improvements constructed as part of the proposed Project would be designed in accordance with applicable requirements of the CBC and any applicable building and seismic codes in effect at the time that the Project plans are submitted.

The Kleinfelder Geotechnical Study includes 2019 CBC Seismic Design Parameters in its evaluation (MM GEO-1) and concludes that the Project is feasible from a geotechnical standpoint, with incorporation of the Geotechnical Study recommendations into the design and construction of the Project, and compliance with applicable building and seismic codes. Therefore, impacts would be a less than significant impact, with mitigation incorporated.

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

**No Impact**. Liquefaction occurs when loose sand and silt that is saturated with water behaves like a liquid when shaken by an earthquake. Earthquake waves cause water pressures to increase in the sediment and the sand grains to lose contact with each other, leading the sediment to lose strength and behave like liquid. As indicated in the Kleinfelder Geotechnical Study (Appendix D) the site is not located within a State designated liquefaction hazard zone as defined by the CGS. Additionally, with the absence of shallow groundwater, the potential for liquefaction to occur on-site is low. Therefore, the Project would not result in a substantial adverse effect, including the risk of loss, injury, or death, due to seismic-related ground failure, including liquefaction. No impact would occur, and no mitigation is required.

***iv) Landslides?***

**No Impact.** The Project site and surrounding area are located in a generally flat, urbanized portion of the City. The California Department of Conservation (DOC) does not designate the site and the surrounding area as Earthquake-Induced Landslide Zones (DOC 2021). Therefore, the Project would not result in a substantial adverse effect, including the risk of loss, injury, or death, due to landslides. No impact would occur, and no mitigation is required.

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

**Less than Significant Impact.** The Project site is relatively flat, lacking a downslope, and is currently covered in impervious surfaces including a single-story industrial building and surface parking lots surrounding the building on the south, east, and west. With construction improvements, including removal and installation of new landscaping, temporary soil erosion may occur due to rainfall and wind if unprotected soils are exposed during construction. Project implementation would not result in significant increases in impervious surfaces or surface runoff. There would be minimal areas of exposed soils following completion of construction, where erosion could occur.

As the Project site has over one acre of land area, it would be required to obtain a NPDES permit for construction activities. The Permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of erosion control, sediment control, tracking, waste management, and construction site maintenance BMPs to reduce the potential for soil and wind erosion during construction activities (see RR HYD-1, in Section 4.10). Further, the proposed Project must comply with the City's grading ordinance, which requires preparation of an erosion control plan for City approval prior to issuance of a grading permit (see RR GEO-2). With compliance with these regulations, construction-related soil erosion would be less than significant, and no mitigation is required.

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

**Less than Significant with Mitigation Incorporated.** As discussed in previous subsections above, the Project site is not located in a potential landslide or a potential liquefaction area. Based on the Kleinfelder Geotechnical Study (Appendix D), during the onsite geotechnical investigation, exploratory borings did not encounter groundwater. The borings involved drilling to a maximum depth of 51.5 feet below the existing ground surface (bgs). The historical high depth to groundwater is estimated to be greater than 100 feet bgs at the Project site. In light of the depth of water and low potential for liquefaction as discussed under item (iii), above, lateral spreading also has a low potential of occurrence. Further, based on the density of the granular soils encountered and lack of groundwater within the upper 50 feet bgs, the potential for liquefaction and seismically induced settlement is not considered a hazard at the site.

As referenced in 4.7(a.ii) above, the Geotechnical Study concludes that the proposed Project is feasible from a geotechnical standpoint, provided the recommendations in the Geotechnical Report are incorporated into the design and construction of the proposed Project. Adherence to recommendations in the Geotechnical Study (MM GEO-1) and to the City's grading code (RR GEO-1), would reduce the potential for impacts to less than significant.

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

**Less than Significant with Mitigation Incorporated.** Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Soils with high clay content have the highest potential for shrink-swell. Soils with high clay content are found primarily in the southern portion of the City. Soils north of Interstate (I) 10, where the Project site is located, consist mainly of sandy gravel and sandy silt (West Covina 2016a). Therefore, the existence of expansive soil on the site is low.

As previously stated, Project construction would be required to comply with 2019 California Building Code (RR GEO-1). Additionally, the Kleinfelder Geotechnical Report concludes that the proposed Project is feasible from a geotechnical standpoint, provided the recommendations in the Geotechnical Study are incorporated into the design and construction of the proposed Project. Therefore, Project impacts related to any potential for expansive soils would be less than significant with compliance with RR GEO-1 and MM GEO-1.

***e) 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?***

**No Impact**. There is no evidence of septic tanks or systems, wastewater, or alternative wastewater disposal systems at the Project site. The use of septic tanks or alternative wastewater disposal systems is not proposed by the Project. The Property is connected to the existing City sanitary sewer system for wastewater disposal. Therefore, no impact would result, and no mitigation is required.

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

**Less than Significant Impact with Mitigation.** Ground-disturbing activities in fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Therefore, construction-related and earth-disturbing actions, have the potential to damage or destroy fossils in these rock units resulting in a significant impact. However, previous onsite grading to accommodate the former industrial building resulted in the placement of artificial fill soil underlying the current Project site. Additionally, any earthwork activities for the proposed Project would be minimal.

Based on the PlanWC's Resource Conservation Element, soils and geologic formations within the City have a low potential to contain significant paleontological resources. Nevertheless, while paleontological resources are not anticipated to be discovered during earthwork activities, if unknown paleontological resources are encountered, implementation of MM GEO-2 would reduce this potential impact to a less than significant level. Therefore, this impact would be less than significant with mitigation.

**Regulatory Requirements**

**RR GEO-1** The Project shall be designed and constructed in compliance with the 2019 California Building Code (CBC) Design Parameters or the most current CBC adopted in the City's Municipal Code.

**RR GEO-2** Prior to issuance of a grading permit, the Project Applicant shall prepare an erosion control plan in compliance with City's Grading Ordinance, as approved by the City.

**Mitigation Measures**

**MM GEO-1** Site preparation and building design specifications shall follow the recommendations in the *Geotechnical Study Proposed DAX9 Warehouse Improvements*, *1211 Badillo Street, West Covina, California,* prepared by Kleinfelder (dated November 13, 2020), as well as any additional future site-specific, design-level geotechnical investigations of the Project. Site preparation and earthwork operations shall be performed in accordance with

applicable codes, safety regulations and other local, State, or federal specifications.

**MM GEO-2** In the event paleontological resources are encountered during construction, ground-disturbing activity shall cease. It is recommended that a Qualified Paleontologist be retained by the Applicant to examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. Criteria for discard of specific fossil specimens shall be made explicit. If a Qualified Paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction; monitoring work and halting construction if an important fossil needs to be recovered; and/or cleaning, identifying, and cataloging specimens for curation and research purposes. The cost associated with recovery, salvage, and treatment shall be borne by the Applicant. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the Qualified Professional. Resources shall be identified and curated into an established accredited professional repository. The Qualified Professional shall have a repository agreement in hand prior to initiating recovery of the resource.

## 4.8 GREENHOUSE GAS EMISSIONS

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

### Impact Analysis

Climate change refers to any significant change in measures of climate (e.g., average temperature, precipitation, or wind patterns) over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, which is an average increase in the temperature of the atmosphere near the Earth's surface; this is attributed to an accumulation of greenhouse gas (GHG) emissions in the atmosphere. GHGs trap heat in the atmosphere which, in turn, increases the Earth's surface temperature. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through fossil fuel combustion in conjunction with other human activities are associated with global warming.

GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride ($SF_6$). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies, such as CARB, or climate change groups, such as the California Climate Action Registry, as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

#### *Regulatory Background*

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05, which calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

The principal overall State plan and policy adopted for the purpose of reducing GHG emissions is AB 32 (California Global Warming Solutions Act of 2006). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 recognizes that California is the source of substantial amounts of GHG emissions. The statute states 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.

In order to avert these consequences, AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020, codifying the goal of EO S-3-05.

CARB approved a Climate Change Scoping Plan as required by AB 32 in 2008; this plan is required to be updated every five years. The Climate Change Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (CARB 2008). The Climate Change Scoping Plan has a range of GHG-reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation regulation to fund the program. On February 10, 2014, CARB released the Draft Proposed First Update to the Climate Change Scoping Plan (CARB 2014). The board approved the final First Update to the Climate Change Scoping Plan on May 22, 2014. The first update describes California's progress towards AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). The latest update occurred in January 2017 and incorporates the 40 percent reduction to 1990 emissions levels by 2030.

The Sustainable Communities and Climate Protection Act of 2008, Senate Bill (SB) 375, established a process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 required SCAG to incorporate a "sustainable communities strategy" (SCS) into its RTPs that will achieve GHG emission reduction targets though several measures, including land use decisions. SCAG's SCS is included in the SCAG 2020–2045 RTP/SCS, *Connect SoCal* (SCAG 2020). The goals of the RTP/SCS include (1) improve mobility, accessibility, reliability, and travel safety for people and goods and (2) Reduce GHG emissions and improve air quality.

On April 29, 2015, Governor Brown signed EO B-30-15, which ordered an interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Five key goals for reducing GHG emissions through 2030 include (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; (3) reducing petroleum use in cars and trucks by up to 50 percent; (4) reducing emissions of short-lived climate pollutants; and (5) managing farms, rangelands, forests, and wetlands to increasingly store carbon. EO B-30-15 also directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

On September 8, 2016, the Governor signed SB 32 to codify the GHG reduction goals of EO B-30-15, requiring the State to reduce GHG emissions by 40 percent below 1990 levels by 2030 (Health and Safety Code Section 38566). As stated above, this goal is expected to keep the State on track to meeting the goal set by EO S-3-05 of reducing GHG emissions by 80 percent below 1990 levels by 2050.

AB 197 was signed at the same time to ensure that the SB 32 goals are met by requiring CARB to provide annual reports of GHGs, criteria pollutants, and TACs by facility, City and sub-county

level, and sector for stationary sources and at the County level for mobile sources. It also requires the CARB to prioritize specified emission reduction rules and regulations and to identify specified information for emission reduction measures (e.g., alternative compliance mechanism, market-based compliance mechanism, and potential monetary and nonmonetary incentive) when updating the Scoping Plan.

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are as follows:

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources and
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. Additionally, SB 350 sets requirements for large utilities to develop and submit integrated resources plans, which detail how utilities would meet their customers' resource needs, reduce GHG emissions, and integrate clean energy resources (CEC 2020a).

On September 10, 2018, Governor Brown signed SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. This policy requires the transition to zero-carbon electric systems that do not cause contributions to increase of GHG emissions elsewhere in the western electricity grid (CEC 2020b). SB 100 also creates new standards for the RPS goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030.

Further, on September 10, 2018, Governor Brown also signed California EO B-55-18, which sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045 and achieve net negative emissions thereafter. EO B-55-18 was added to the existing Statewide targets of reducing GHG emissions, including the targets previously established by Governor Brown of reducing emissions to 40 percent below 1990 levels by 2030 (EO B-30-15 and SB 32), and by Governor Schwarzenegger of reducing emissions to 80 percent below 1990 levels by 2040 (EO S-3-05).

The City of West Covina does not currently have a Climate Action Plan; however, the City has adopted an Energy Action Plan (EAP). Therefore, the Project is evaluated against the City's EAP. The purpose of the EAP is to "guide the City of West Covina toward attainable conservation goals that may also significantly reduce the impact of GHG emissions within the community" (City of West Covina 2011). The goals of the City's EAP include the following: educating the public about energy-saving techniques and programs; promoting and creating energy conservation opportunities and programs; installing environmentally benign, renewable, and reliable energy facilities; participating in alliances with local businesses and with other agencies; pursuing and performing local and higher funding opportunities; and coordinating other City policies, programs, and ordinances to become compatible with Sustainable Community goals.

### *SCAQMD Significance Criteria*

The City of West Covina has not officially adopted any GHG CEQA significance threshold. The City defers to assessment methods and significance thresholds developed by the SCAQMD. The SCAQMD has adopted a GHG emissions significance threshold of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year for industrial facilities (SCAQMD 2019). The Project has filed for a redesignation of the General Plan Land use to Industrial and a rezoning to Manufacturing, as described in Section 3.3 of this document. Thus, the 10,000 $MTCO_2e$/year is an appropriate threshold.

It is noted that the SCAQMD threshold for industrial facilities was based on evaluation of stationary source facilities, i.e., facilities where most air pollutants are emitted through point sources (smokestacks). Because most of the Project's emissions would not be from point sources, discussion of the more conservative threshold for non-industrial land uses is included. On December 5, 2008, the SCAQMD Governing Board presented the staff proposal for a tiered threshold approach wherein Tier 1 determines if a project qualifies for an applicable CEQA exemption, Tier 2 determines consistency with GHG reduction plans, and Tier 3 proposes a numerical screening value as a threshold (SCAQMD 2008b). At their September 28, 2010, meeting, the Working Group suggested a Tier 3 threshold of 3,000 $MTCO_2e$ per year for all non-industrial land use types (SCAQMD 2010). Tier 4 determines if a project meets performance standards. Tier 4 has three options: Option 1—percent emission reduction target; Option 2—early implementation of applicable measures, and Option 3—sector-based standard. Tier 5 determines mitigation for CEQA offsets. For non-industrial land uses the City has deferred to assessment methods and significance thresholds developed by the SCAQMD.

This impact analysis also evaluates consistency with regulatory programs designed to reduce GHG emissions and that contribute to the achievement of AB 32's and SB 32's goals as the primary significance criterion.

### *Would the Project:*

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

**Less Than Significant Impact.** The primary source of construction-phase GHG emissions would be internal combustion engines of construction equipment, on-road construction vehicles, and workers' commuting vehicles. GHG emissions from construction activities were calculated with the CalEEMod model, described in Section 4.3, Air Quality. The estimated construction GHG emissions for the Proposed Project would be 184 $MTCO_2e$, as shown in Table 4-9, *Estimated Greenhouse Gas Emissions from Construction*.

**TABLE 4-9**
**ESTIMATED GREENHOUSE GAS**
**EMISSIONS FROM CONSTRUCTION**

| Year | Emissions ($MTCO_2e$) |
|---|---|
| 2021 | 46 |
| 2022 | 138 |
| **Total** | **184** |

$MTCO_2e$: metric tons of carbon dioxide equivalent

Notes:

- Detailed calculations in Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data.

Operational GHG emissions would come primarily from vehicle trips; other sources include electricity and water consumption; natural gas for space and water heating; and gasoline-powered landscaping and maintenance equipment. Table 4-10, Estimated Annual Greenhouse Gas Emissions from Project Operation, shows the annual GHG emissions from proposed Project's operations.

**TABLE 4-10**
**ESTIMATED ANNUAL GREENHOUSE GAS**
**EMISSIONS FROM PROJECT OPERATION**

| Source | Emissions ($MTCO_2e$/yr) |
|---|---|
| Area | <1 |
| Energy | 532 |
| Mobile | 1,692 |
| Waste | 42 |
| Water | 123 |
| **Total Operational Emissions** | **2,390** |

$MTCO_2e$/yr: metric tons of carbon dioxide equivalent per year

Notes:

- Totals may not add due to rounding variances.
- Detailed calculations in Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data.

Because impacts from construction activities occur over a relatively short period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). Therefore, construction and operational emissions are combined by amortizing the construction and operations over an assumed 30-year project lifetime. This combination is shown in Table 4-11, Estimated Total Project Annual Greenhouse Gas Emissions, using the proposed Project's amortized construction and operational emissions.

**TABLE 4-11**
**ESTIMATED TOTAL PROJECT ANNUAL**
**GREENHOUSE GAS EMISSIONS**

| Source | Emissions ($MTCO_2e/yr^a$) |
|---|---|
| Construction (Amortized) | 6[a] |
| Operations (Table 4-10) | 2,390 |
| **Total[b]** | **2,396** |
| **SCAQMD threshold for industrial facilities** | **10,000** |
| **Exceeds Threshold?** | **No** |
| **SCAQMD-Recommended Threshold for non-industrial land uses** | **3,000** |
| **Exceeds Threshold?** | **No** |

$MTCO_2e/yr$: metric tons of carbon dioxide equivalent per year

[a] Total derived by dividing construction emissions (see Table 4-11) by 30.
[b] Total annual emissions are the sum of amortized construction emissions and operational emissions.

As shown in Table 4-11 the estimated GHG emissions from the Project would be less than both the threshold for industrial facilities and the threshold for non-industrial land uses. The impact would be less than significant, and no mitigation is required.

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

**Less Than Significant Impact.** The principal State plan and policy adopted for the purpose of reducing GHG emissions is the AB 32 Scoping Plan. The goals of AB 32 include reducing GHG emissions to 1990 levels by 2020 and adapting to climate change. There are a number of GHG reduction plans that have been adopted on the State and regional level. The SCAG adopted this 2020–2045 RTP/SCS for the six-county region including Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The RTP/SCS seeks to improve the mobility of goods movement and reduce GHG emissions. This Plan demonstrates how the region would reduce transportation emissions to comply with SB 375. This is achieved by numerous transportation related programs and projects which seek to improve the operational efficiency of the transportation network, promote mass transit and non-automobile forms of transportation, and fulfill the requirements for the SCS to reduce GHG emissions.

The Project Traffic Impact Study evaluated the Project's VMT according to the SGVCOG methods and the City of West Covina's criteria for VMT per service population (NV5 2021b). The study shows that the Project VMT per service population would be less than without the Project. The Traffic Impact Study also compares VMT from current delivery stations and from the proposed Project. The Project would result in 730 fewer regional delivery VMT per day. These VMT reductions would result in fewer GHG emissions and demonstrate consistency with the RTP/SCS.

As discussed previously, the City of West Covina has adopted standards for the purpose of reducing energy consumption, which would result in a reduction in GHG emissions. The State policy and standards adopted for the purpose of reducing GHG emissions that are applicable to the proposed Project are EO S-3-05, AB 32, the California Global Warming Solutions Act of 2006, and SB 32. The quantitative goal of these regulations is to reduce GHG emissions to 1990 levels by 2020 to 80 percent below 1990 levels by 2050, and for SB 32, to 40 percent below 1990 levels by 2030. Statewide plans and regulations (such as GHG emissions standards for vehicles, the

Low Carbon Fuel Standard, Cap-and-Trade, and renewable energy) are being implemented at the statewide level, and compliance at a project level is not addressed.

As stated above, the City adopted the EAP to identify the City's long-term strategies and commitment to achieve energy efficiency in the community and in City operations. However, the EAP does not include requirements or standards for implementation of energy reduction for development projects. Table 4-12, below, shows the applicable EAP policies applicable to the Project and the Project's consistency with these policies.

**TABLE 4-12**
**ENERGY ACTION PLAN CONSISTENCY**

| Energy Action Plan Policy | Project Consistency Analysis |
|---|---|
| Provide on-line (Internet accessible) guidance and assistance to Homeowners and Builders to make compliance with new Title 24 energy requirements as effective and efficient as possible. | **Consistent**. The Project site would be equipped with internet accessibility, which would provide builders with the ability to effectively and efficiently meet Title 24 energy requirements. |
| Modify the City's lighting standards to encourage the application of "Dark Skies" goals (discourage excessive and spill-over lighting). | **Consistent**. The Project would comply with the City's lighting ordinance (Section 26-570) for non-residential buildings. |
| Promote energy and water conservation design features in all major renovation and development projects. | **Consistent**. The Project is designed to meet current Title 24 Standards at the time of Building Permit Review. The regulation of energy efficiency for residential and non-residential structures is established by the California Energy Commission and its California Energy Code. |
| Encourage the efficient use of water and reduce urban runoff through the use of natural drainage, drought tolerant landscaping, and efficient irrigation systems in major renovation and new development projects. Recommend the incorporation of these practices within the approval processes of other local and regional departments and jurisdictions. | **Consistent.** The Project would meet current California Green Building Standards Code (CALGreen Code) for indoor water use. |
| Source: City of West Covina 2011. | |

As shown in Table 4-14, the Project is consistent with applicable EAP policies. The Project would be built to meet the current applicable Title 24 Energy Efficiency Standards for Nonresidential Buildings (California CCR, Title 24, Part 6) and the applicable CALGreen Code (24 CCR 11).

The regulations, plans, and polices adopted for the purpose of reducing GHG emissions that are directly applicable to the Project include the 2019 Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen) (RR ENE-1). The 2019 Title 24 Energy Efficiency Standards for non-residential buildings include requirements heating/cooling and lighting requirements. Under the 2019 Standards, new nonresidential buildings will be 30 percent more energy efficient when compared to the 2016 Title 24 Energy Efficiency Standards. Although the Project does not include new buildings, the standards include requirements for building alterations and repairs, including outdoor lighting.

CALGreen requirements include reductions in indoor and outdoor water use, diversion of construction and demolition waste, inclusion of electric vehicle charging spaces or designated spaces capable of supporting future charging stations. These codes are enforced by the City, and adherence to standard requirements for construction and operations would ensure that the proposed Project would comply with both regulations.

The proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The impact would be less than significant, and no mitigation is required.

**Regulatory Requirements**

**RR ENE-1** would be applicable to this analysis.

**Mitigation Measures**

Project implementation would not result in significant impacts related to GHG emissions; therefore, no mitigation measures are required.

## 4.9 HAZARDS AND HAZARDOUS MATERIALS

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

### Impact Analysis

A Phase I and Limited Phase II Environmental Site Assessment (ESA) were prepared by Geosyntec Consultants, Inc. in May and June 2020, respectively. Additionally, an Asbestos and Lead-Based Paint Survey Report was prepared by AdvanceGeo, Inc. (AGI) in June 2020. The results of these reports are summarized below and included in the Appendices E1 and E2, respectively to this IS/MND.

***Would the Project:***

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

**Less than Significant Impact.** Demolition and construction activities for the proposed Project would involve the use of chemical substances such as solvents, paints, fuel for equipment, and other potentially hazardous materials. Hazards to the environment or the public would typically occur with the transport, use, storage, or disposal of hazardous materials. Demolition and construction activities would be relatively short-term and the transport, use, and disposal of hazardous materials as part of these activities would be temporary. The contractor would be required to comply with existing regulations for the transport, use, storage, and disposal of hazardous materials to prevent public safety hazards. These regulations include the Hazardous

Materials Transportation Act, Resource Conservation and Recovery Act, California Hazardous Waste Control Act, and California Accidental Release Prevention Program, among others.

Once constructed, the proposed Project would use hazardous materials (e.g., paint, pesticides, cleansers, and solvents) for maintenance activities but any use would be in limited quantities typical to industrial developments in urban environments. The Project would not utilize, store, or generate hazardous materials or wastes in quantities that would pose a significant hazard to the public. Impacts would be less than significant, and no mitigation is required.

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

**Less than Significant With Mitigation Incorporated.** The Phase I ESA review of historical aerial photographs indicate the site was used for agricultural purposes from 1928 until 1960. The on-site building was constructed in 1963. From 1963 until 1988, the Project site was owned and operated by Honeywell, Inc. Training and Control Systems Division (Honeywell) and from 1988 to 1994 ownership and operation continued under the Hughes family of companies (Hughes). In 1994, Faith Church acquired the site, operating a community church and school facility.

As noted, from 1963 to 1994, the Project site was used as a manufacturing and assembly facility for flight simulators and electronic components, which reportedly generated wastes that were stored on-site. The wastes reported included solvents, machine and hydraulic oils, waste paints, polychlorinated biphenyl-containing light ballasts, spent batteries, acids, and adhesives. Hughes conducted a site assessment in September 1994 in accordance with a closure plan submitted to the Department of Toxic Substance Control (DTSC). Based on analytical results conducted in 1994, the facility, including the hazardous waste storage area (HWSA), was granted closure on November 23, 1994 (Geosyntec 2020a). Current uses adjacent to the site include residential to the north, south, and east. Commercial, retail, and industrial uses are operating to the west. These uses do not store, use, or dispose of hazardous materials in quantities that may pose hazards to the public. Surrounding properties with environmental concern were not identified in the Phase I ESA.

According to the Phase I ESA assessment, no evidence of controlled recognized environmental conditions or historical recognized environmental conditions are present on the Project site. However, the assessment revealed evidence of one recognized environmental condition (REC). The review of the historical soil vapor data determined that select volatile organic compounds (VOCs) concentrations are above current allowable screening levels, indicating there may be a potential for vapor intrusion of VOCs. Therefore, in regard to impacts from historical operations, the Phase I ESA finding is a REC. (Geosyntec 2020a).

A Limited Phase II ESA was performed in June 2020 by Geosyntec to evaluate potential vapor intrusion to indoor air risk associated with findings identified as part of Geosyntec's Phase I ESA conducted in May 2020. For soil sampling, the analysis reported concentrations of VOCs were below Commercial Screening Levels (SLs). In sub-slab vapor samples, concentrations of VOCs were below Commercial SLs with the exception of Tetrachloroethene. The soil sampling also detected arsenic at concentrations exceeding SLs; however, the detected arsenic concentrations at the site were less than what is considered to be background levels in southern California. Concentrations of other VOCs in the indoor air were below Commercial SLs with the exception of benzene in six of the seven indoor air locations. Benzene was also detected at concentrations below the Commercial SL but above the Residential SL in the seventh indoor air sample, as well as the outdoor air sample at similar concentrations, indicating a likely outdoor air contribution to the benzene in indoor air samples.

An Asbestos and Lead-Based Paint Survey Report was prepared by AGI in June 2020. Because of the age of the existing uses, asbestos may have been used for construction. As part of the demolition activities, ACM would be a consideration and contact with these materials would pose hazards to the construction crew and other persons near the construction site. According to the report, asbestos was not detected in any of the sampled suspect asbestos containing building materials. LBP was determined to be present within the building at the site (AGI 2020) and may also pose hazardous to the construction crew and other persons near the construction site.

Demolition, removal, and disposal of ACM and LBP are required to comply with existing regulatory requirements, including the Federal and State Occupational Safety and Health Regulations; SCAQMD Regulation X, Subpart M — National Emission Standards For Asbestos and Rule 1403 — Asbestos Emissions (see RR HAZ-2); and California Code of Regulations Title 8, Section 1532.1 — Lead and Section 1529 — Asbestos (see RR HAZ-1 and RR HAZ-3). Compliance with these regulations would be included on the contractor specifications and verified by the City's Community Development Director, or designee in conjunction with the issuance of the Demolition Permit. Compliance with RR HAZ-1 through RR HAZ-3 would ensure that no impacts pertaining to demolition would occur. Impacts would be less than significant, and no mitigation is required.

Short-term construction impacts do not include grading for the proposed Project, therefore encountering VOC-impacted soils would be unlikely during tenant improvements. However, due to the findings of the June 2020 report and the potential VOC's in the soil, MM HAZ-1 has been incorporated to further verify VOC's on-site. Implementation of this mitigation measure and compliance with applicable standards and requirements would ensure that impacts are less than significant pursuant to Threshold 4.9(b).

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

**Less than Significant Impact.** No existing or proposed schools in the City of West Covina are located within a 0.25-mile radius of the Project site. Two schools in the City of Covina, Grovecenter Elementary School (0.05 mile to the southeast) and Las Palmas Middle School (0.10 mile to the northeast), are within 0.25 miles of the Project site.

There is a potential to expose children at these nearby schools to hazardous substances through accidental releases during demolition and construction activities. However, during demolition, existing hazardous materials and wastes would be removed and disposed in accordance with pertinent regulations, including RR HAZ-1 through RR HAZ-3, as discussed above. During construction, a potential exists for the accidental release or spill of hazardous substances such as gasoline, oil, hydraulic fluid, diesel fuel, or other liquids associated with construction equipment operation and maintenance. However, use of these materials would be in limited quantities as typical during the operation and maintenance of construction equipment and would be conducted in compliance with applicable federal, State, and local regulations. Additionally, the contractor would be required to use standard construction controls and safety procedures, which would avoid and minimize the potential for accidental release or spill of such substances into the environment. With compliance with pertinent regulations (RR HAZ-1 through RR HAZ-3), the level of risk associated with the accidental release of hazardous substances during demolition and construction would be less than significant, and no mitigation is required.

On-site activities associated with implementation of the proposed Project would not generate hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste in quantities that may impact students at nearby schools. There would be a less than significant impact, and no mitigation is required.

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

**No Impact**. According to a review of the DTSC Hazardous Waste and Substances Site List — Site Cleanup (Cortese List) (DTSC 2021), the Project site is not included on a list of hazardous material sites compiled pursuant to California Government Code Section 65962.5. Therefore, the Project does not have the potential to create a significant hazard to the public or the environment due to presence of an existing hazardous materials site identified on the Cortese List. No impact would occur, and no mitigation is required.

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

**No Impact**. The Project site is not located within two miles of an airport. The nearest public airports are the San Gabriel Valley Airport (formerly El Monte Airport), located 6 miles west of the Project site, and the Brackett Field Airport, located 7.90 miles east of the Project site.

West Covina is not within the San Gabriel Valley Airport Influence Area, as defined by the Los Angeles County Airport Land Use Plan (Los Angeles County ALUC 1991). Similarly, West Covina is not within the Brackett Field Airport Influence Area, as defined by the Brackett Field Airport Land Use Compatibility Plan (Los Angeles County ALUC 2015). Thus, the Project would not result in a safety hazard or excessive noise for people working on the site, as it relates to exposure to airport or aircraft hazards in areas within an airport land use plan or within two miles of a public airport. No impact would occur, and no mitigation is required.

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

**Less than Significant Impact.** The City of West Covina has a Natural Hazard Mitigation Plan which addresses natural hazards, risks, and mitigation actions for the City. It establishes a framework for proactive local planning for natural hazard mitigation, per the federal Disaster Mitigation Act of 2000. The nearest designated disaster route to the Project site is North Vincent Avenue, which is less than 0.25 miles west of the site (LAC Public Works 2008). The nearest designated freeway disaster route is I-10 freeway, located approximately 1.0-mile south of the Project site.

Short-term construction for the Project is not anticipated to cause any public roadway or lane closures on adjacent or nearby streets (San Bernardino Avenue, Badillo Street, North Vincent Avenue, and North Lark Avenue) due to the type of construction (tenant improvements) proposed. However, implementation of traffic control measures during construction in accordance with Chapter 19, Article X, Section 19-302, Standard Specifications for Public Works Construction, of the Municipal Code, which adopts the Greenbook by reference (see RR HAZ-4), would ensure the reduction of potential for traffic hazards and the obstruction of access to adjacent parcels.

During operation, the proposed Project would provide ingress and egress via three driveways located on San Bernardino Road and four driveways on Badillo Avenue. The primary access point that would be used for emergency response to the site would be the northwest driveway on San Bernardino Road near Cutter Way. Additional access would be the northeast driveway on San Bernardino Way and all four driveways on Badillo Street. Emergency evacuation of the site would occur via the northwest, northeast, and middle driveways (an egress only) on San Bernardino

Way and four driveways on Badillo Street. Additionally, San Bernardino and Badillo Street are not designated evacuation corridors in the City. Therefore, the Project would not affect emergency response or emergency evacuation of adjacent land uses. There would be less than significant impacts, and no mitigation is required.

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

**No Impact.** The Project site is located in a highly urbanized area of the City. The site and the surrounding areas are not located in designated Very High Fire Hazard Severity Zones (VHFHSZ), as identified by the California Department of Forestry and Fire Prevention (CalFire) (CAL FIRE 2011) and indicated in Section 4.20 of this IS. Rather, the site is within a Non-VHFHSZ area. Implementation of the proposed Project would not expose people or structures directly or indirectly to a significant risk of loss or death involving wildland fires. No impact would occur, and no mitigation is required.

**Regulatory Requirements**

**RR HAZ-1** The demolition contractor shall comply with the requirements of Title 8 of the *California Code of Regulations* (Section 1532.1-Lead) regarding the removal of lead-based paint or other materials containing lead. The regulations set exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to lead. Lead-contaminated debris and other wastes shall be removed and monitored by contractors with appropriate certifications from the California Department of Health Services and disposed of in accordance with the applicable provisions of the *California Health and Safety Code*.

**RR HAZ-2** The demolition contractor shall comply with the South Coast Air Quality Management District's (SCAQMD's) Rule 1403, which provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, prior to the demolition, renovation, rehabilitation, or alteration of structures that may contain asbestos, an asbestos survey shall be performed by a Certified Asbestos Consultant (certified by the California Occupational Safety and Health Administration [CalOSHA]) to identify building materials that contain asbestos. Removal of the asbestos shall then include prior notification of the SCAQMD and compliance with removal procedures and time schedules; asbestos handling and clean-up procedures; and storage, disposal, and landfilling requirements under Rule 1403.

**RR HAZ-3** The demolition contractor shall comply with the *California Health and Safety Code* (Section 39650 et seq.) and the *California Code of Regulations* (Title 8, Section 1529), which prohibit emissions of asbestos from asbestos-related demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for the release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos.

**RR HAZ-4** All construction on public rights-of-way shall include the implementation of traffic control measures in accordance with the West Covina Municipal Code Chapter 12.20, Street Excavation, and Chapter 19, Article X, Section 19-302, Standard Specifications for Public Works Construction, which adopts the Greenbook by reference.

## Mitigation Measures

**MM HAZ-1** Prior to grading and building permit approval, additional soil vapor sampling shall be performed in order to verify current vapor levels on the Project site. Sampling shall be completed according to Advisory Active Soil Gas Investigations (DTSC et. al. 2015) and results shall be compared to appropriate risk-based screening levels. If concentrations are below screening levels, no further mitigation is required. If concentrations are above screening levels, other actions shall be developed in consultation with appropriate regulatory agencies in order to reduce screening to appropriate levels.

## 4.10 HYDROLOGY AND WATER QUALITY

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

### Impact Analysis

The City of West Covina is underlain by the San Gabriel Valley Groundwater Basin, which consists of water-bearing sediments that underlie most of the San Gabriel Valley and a portion of the upper Santa Ana Valley. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies. The basin contains several contaminant plumes including nitrates, volatile organic compounds, and perchlorate from past industrial processes. Cleanup of these contaminants continues today. Despite their presence, the overall groundwater quality of the basin for potable use is high (West Covina 2016b).

***Would the Project:***

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

**Less Than Significant Impact.** Implementation of the Project would involve demolition of portions of the existing industrial building to accommodate dock doors, interior modifications, and infrastructure improvements. Additionally, exterior property improvements are proposed for the surface parking lots and for new landscaping. Site improvements would also include regrading a driveway along East San Bernardino Road to repair existing drainage low spots. Therefore, the Project has the potential to result in short-term construction impacts to surface water quality from

demolition and construction-related activities. Storm water runoff from the construction site would contain loose soils, organic matter, and sediments. Spills or leaks from heavy equipment and machinery, such as fuel, oil and grease, and heavy metals, could also enter the runoff. Building construction would involve the use of hazardous materials (e.g., paints, solvents, cleansers) that, if not properly handled, may enter the stormwater runoff.

The Clean Water Act establishes a framework for regulating potential water quality impacts from construction activities, as well as new development and major redevelopment, through the NPDES program. Construction activities that disturb one acre or more of land are required to obtain an NPDES permit or coverage under the NPDES Construction General Permit. This is accomplished by completing and filing Permit Registration Documents (PRD) (including a Notice of Intent, an SWPPP, an annual fee, and a signed certification) with the SWRCB prior to start of construction activities. The BMPs in the SWPPP are implemented during construction to reduce storm water pollutants to the maximum extent practicable. Coverage under the NPDES Construction General Permit and implementation of the Project's SWPPP (see RR HYD-1) would ensure that short-term, construction-related water quality impacts would be less than significant and no mitigation is required.

Stormwater pollutants that would be generated by the Project in the long-term include sediment, trash and debris, oil and grease, bacterial indicators, nutrients, and pesticides that would come from landscaped areas, drive aisles, and parking areas. In accordance with the NPDES program and Section 9.36, Control of Pollutants from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project Applicant would be required to prepare and implement a standard urban stormwater mitigation plan (SUSMP) (RR HYD-2). The City would review and approve the SUSMP prior to construction and operation of the Project. The SUSMP would include LID, structural and non-structural BMPs, and source control BMPs including construction of new LID Stormwater Treatment BMPs on the north side of the existing building to address the drainage low spots on the East San Bernardino Road drive described above.

Compliance with RR HYD-1 and RR HYD-2 would reduce the risk of water degradation from soil erosion and other pollutants related to construction activities, and potential violations of water quality standards would be minimized through required BMPs. Therefore, the Project would not violate water quality standards or waste discharge requirements. Impacts would be less than significant, and no mitigation is required.

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

**No Impact.** The Project would not involve direct or indirect withdrawals of groundwater. Domestic water service would be provided by the Azusa Light & Water, as described in Section 4.19, Utilities and Service Systems. Most of the Project site is currently covered by impervious surfaces including the existing building and surrounding surface parking lots to the east, west, and south. The Project would involve replacement of infrastructure and tenant improvements for existing structures and facilities. Therefore, Project implementation would not result in a significant increase of impervious surfaces and surface runoff. The Project would not deplete groundwater supplies or interfere adversely with groundwater recharge. No impacts would occur, and no mitigation is required.

***c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

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

**Less Than Significant Impact**. The Project would be required to obtain a NPDES permit, as describe in Section 4.7(b) Geology and Soils, for construction activities or coverage under the NPDES Construction General Permit. The Construction General Permit requires preparation of a SWPPP and implementation of erosion control, sediment control, tracking, waste management, and construction site maintenance BMPs to reduce the potential for soil and wind erosion during construction activities (see RR HYD-1). Further, the proposed Project must comply with the City's grading ordinance, which requires preparation of an erosion and sediment control plan for City approval prior to issuance of a grading permit (see RR GEO-2). With compliance with these regulations, construction-related erosion would be less than significant, and no mitigation is required.

There would be minimal areas of exposed soils following completion of the proposed Project where erosion could occur. Site improvements and landscaping would also prevent long-term erosion (RR HYD-2). Therefore, operation-related erosion would be less than significant, and no mitigation is required.

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

**Less Than Significant Impact**. As discussed in Section 4.10(b), most of the Project site is currently covered with impervious surfaces. The proposed Project is not expected to increase the total impervious area onsite. The Project primarily involves replacement of infrastructure and tenant improvements for the existing structures and facilities. Therefore, Project implementation is not expected to result in a significant increase of impervious surfaces and associated surface runoff.

The site currently utilizes existing storm drains and utility connections (water, sewer, electricity, natural gas, and telecommunication lines). Stormwater is expected to match historical drainage patterns and volumes between pre-development and post-development surface runoffs. Further, any public infrastructure improvements would be done in accordance with the City's Municipal Code to ensure compliance. Therefore, the proposed changes resulting from the Project would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation is required.

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

**Less Than Significant Impact**. Stormwater is rainwater that does not soak into the ground. It flows over paved areas like streets, sidewalks, and parking lots, as well as roofs and sloped lawns. As it flows, the stormwater collects and carries pollutants. Stormwater conveyance within the San Gabriel River watershed is managed by the USACE, the Los Angeles County Flood Control District, and the Los Angeles County Department of Public Works. The City of West Covina manages stormwater conveyance through implementation of a Master Drainage Plan. (West Covina 2016a).

As discussed in Section 4.10(b), most of the Project site is currently covered in impervious surfaces. The Project involves replacement of infrastructure and tenant improvements on existing structures and facilities. The Project is not expected to cause an increase to impervious surfaces, and stormwater is expected to match historical drainage patterns and volumes between pre-development and post-development surface runoffs. Further, as discussed in Section 4.10(a), the Project would be required to obtain a NPDES permit that would maximize on-site infiltration and minimize off-site runoff and would not result in the discharge of stormwater that would exceed the stormwater conveyance capacity of existing or planned stormwater drainage systems. Therefore, the Project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation is required.

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

**Less than Significant Impact**. The Federal Emergency Management Agency (FEMA) designates most of West Covina as Zone X, which is an area subject to flooding from the 500-year flood (0.2 percent annual chance of flooding) (FEMA 2021). Stormwater conveyance within the San Gabriel River watershed is managed by the USACE, the Los Angeles County Flood Control District, and the Los Angeles County Department of Public Works. The City of West Covina manages stormwater conveyance through implementation of a Master Drainage Plan. Regional and local flood control systems minimize flood risk for structures within the City (West Covina 2016b).

Compliance with the City's Municipal Code would ensure the Project incorporates adequate flood protection measures. Additionally, implementation of temporary and permanent erosion control BMPs in the Project's SWPPP and SUSMP (see RR HYD-1 and RR HYD-2) would ensure that substantial erosion or siltation would not occur on- or off-site during short-term construction and long-term operation of the Project. Thus, the Project would not result in erosion or siltation that would alter the drainage pattern of the area and redirect flood flows. Project impacts would be less than significant, and no mitigation is required.

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

**No Impact**. A seiche is the resonant oscillation of a body of water caused by earthquake shaking (waves). Seiche hazards exist where groundshaking causes water to splash out of the body of water and inundate nearby areas and structures. The site is not located near a large body of water that may be subject to seiche. Additionally, Tsunamis are seismic sea waves generated by undersea earthquakes or landslides. The City of West Covina is not located along the coast, and the Project site is approximately 31.4 miles from the Pacific Ocean. Further, the Project site is relatively flat. There are no hillside areas on-site or in the surrounding area that could generate mudflow. As a result, no impacts related to seiche, tsunami, or mudflow would occur, and no mitigation is required.

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

**Less Than Significant Impact.** As discussed above in Response 4.10(a), the Project would be required to comply with applicable water quality regulations for short-term and long-term impacts. Specifically, the Project would have coverage under the NPDES Construction General Permit and implementation of the Project's SWPPP (see RR HYD-1) would ensure that short-term, construction-related water quality impacts would be less than significant. For long-term water quality impacts, in accordance with the NPDES program and Section 9.36, Control of Pollutants

from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project would be constructed and operated in accordance with the SUSMP, prepared for the Project and approved by the City (see RR HYD-2). Thus, with implementation of permanent BMPs in the SUSMP, the Project site would generate less stormwater pollutants than under existing conditions.

As indicated above in response to Threshold 4.10(a), there are no groundwater wells on the Project site and no wells are proposed as part of the Project. The proposed Project would not involve direct withdrawals of groundwater, nor would it interfere with groundwater recharge such that it would result in a net deficit in aquifer volume or lowering of the local groundwater table levels. Excavation activities would not extend into the underlying groundwater, which has a historical high depth to groundwater at approximately 100 feet bgs at the Project site (Kleinfelder 2020). Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Project impacts would be less than significant, and no mitigation is required.

**Regulatory Requirements**

**RR HYD-1** Prior to demolition and construction activities on the site, the Contractor shall prepare and file a Permit Registration Document (PRD) with the State Water Resources Control Board in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved Construction General Permit. The PRD shall consist of a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP); an annual fee; and a signed certification statement. Pursuant to permit requirements, the Project Applicant/Developer shall implement the Best Management Practices (BMPs) in the SWPPP to reduce or eliminate construction-related pollutants in site runoff. The BMPs shall be implemented during all demolition and construction activities on the site.

**RR HYD-2** In accordance with Section 9.36, Control of Pollutants from New Developments/Redevelopment Projects, of the West Covina Municipal Code, the Project shall be constructed and operated in accordance with the standard urban stormwater mitigation plan (SUSMP) prepared for the Project and approved by the City.

**Mitigation Measures**

Project implementation would not result in significant impacts related to hydrology and water quality; therefore, no mitigation measures are required.

## 4.11 LAND USE AND PLANNING

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ |

### Impact Analysis

This section evaluates potential impacts to Land Use and Planning that could result from Project implementation. Analysis in this section is based on field observations, use of aerial photography, and a review of related planning documents used to document the existing environmental setting conditions, and information sources identified in this section. Responses to the impact questions listed above are provided below.

***Would the Project:***

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

**No Impact.** The Project would not physically divide an established community. The Project proposes to repurpose the recently occupied private facility (Faith Community Church) for an Amazon Last Mile Delivery Station. Prior to Faith Church, Honeywell Corporation and Hughes Aircraft/Electronics operated an industrial manufacturing operation in the existing building. Further, the Project site is located within an established built environment of the City and is surrounded by a mix of uses including residential, retail, warehouse, commercial office, commercial, and light industrial. The introduction of the industrial use would not disrupt nor present a barrier to the surrounding established community to the north, east, south, and west. The proposed Project would not physically divide an established community. No impacts would occur and no mitigation is required.

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

**Less than Significant Impact**. The Project site is currently designated as Civic: Public Institution. The PlanWC describes the Civic designation as planning areas that accommodate places of government offices, libraries, schools, community centers, and places of religious worship. The current zoning for Faith Community Church is Specific Plan (SP) 11, a designation to accommodate church and school uses on-site.

Prior uses were, as describe Section 4.11a, manufacturing by Honeywell Corporation and Hughes Aircraft/Electronics. The Project proposes to reintroduce the previous GP land use designation onsite. The proposed Project is requesting a General Plan Amendment (GPA) to Industrial and a Zone Change to Manufacturing (M-1). The land use designation of Industrial permits intensive manufacturing, processing, warehousing and similar uses, as well as light, clean industries, and support offices. The designation also allows workplace-serving retail functions and work-live residences where such secondary functions would complement and be compatible with industrial uses. Industrial land uses are primarily composed of large-scale buildings. The designation also

recognizes Transit Oriented Development, employment centers, or working villages with a mix of uses. Further, only tenant improvements are proposed to the site in order to accommodate warehouse and distribution services.

With approval of the proposed GPA, the proposed Project would be consistent with the General Plan land use designation for the Project site. Therefore, impacts would be less than significant, and no mitigation is required.

**Mitigation Measures**

Project implementation would not result in significant impacts related to land use and planning; therefore, no mitigation measures are required.

## 4.12 MINERAL RESOURCES

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☒ |

### Impact Analysis

***Would the Project:***

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

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

**No Impact.** The CGS designates Mineral Resources Zones (MRZs) according to the presence of or potential for underlying mineral resources. MRZ-1 is an area with no significant mineral deposits; MRZ-2 is an area with significant mineral deposits; and MRZ-3 is an area containing known mineral resources of undetermined significance. The Project site is not located within an MRZ zone (DOC 2015) and there are no mines in the City per the California Department of Conservation, Division of Mine Reclamation (DOC 2020). Further, the PlanWC Final EIR indicates there are no areas within the City containing known mineral resources appropriate for mineral extraction.

Thus, the Project would not result in the loss or availability of known mineral resources or locally important mineral resources. No impacts would occur, and no mitigation is required.

### Regulatory Requirements

None required.

### Mitigation Measures

Project implementation would not result in significant impacts related to mineral resources; therefore, no mitigation measures are required.

## 4.13 NOISE

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

### Impact Analysis

This section is based upon the Noise Impact Analysis — DAX9, West Covina, California Delivery Station, prepared by NV5, June 22, 2021, and included in Appendix F.

### FUNDAMENTALS OF NOISE

### Sound, Noise and Acoustics

Sound is a mechanical radiant energy that is transmitted by longitudinal pressure waves in a material medium, such as air in the case of traffic and stationary noise and is the objective cause for human hearing. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. Noise is defined as an unwanted sound.

### Frequency

When sound travels through air, the atmospheric pressure varies periodically. The number of pressure variations per second is called the frequency of sound and is measured in Hertz (Hz) which is defined as cycles per second. Our hearing systems are not equally sensitive to all sound frequencies. Thus, not all frequencies are perceived as being equally loud at the same sound pressure level, and when calculating overall environmental noise ratings it is necessary to consider sounds at some frequencies as more impactful than those at other frequencies. Low-frequency sounds are low in pitch (bass sounding) and high-frequency sounds are high in pitch (squeak). The human ear can hear from a bass pitch starting at 20 Hz all the way to the high pitch of 20,000 Hz.

### Sound Pressure Levels and Decibels

Sound pressure level (SPL or Lp) is a logarithmic measure of the effective pressure of a sound relative to a reference value. The sound pressure levels are measured in decibels (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA.

## Addition of Decibels

Because decibels are on a logarithmic scale, sound pressure levels cannot be added or subtracted by simple plus or minus addition. To add two or more noise levels, if the difference between the highest and next highest noise level is: 0–1 dB then add 3 dB to the higher level to give the total noise level, 2–3 dB then add 2 dB to the higher level to give the total noise level, 4–9 dB then add 1 dB to the higher level to give the total noise level, 10 dB and over, then the noise level is unchanged (i.e. the higher level is the total level).

## Human Response to Changes in Noise Levels

In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, and it perceives a sound within that range as being more intense than a sound with a higher or lower frequency with the same magnitude. For purposes of this analysis as well as with most environmental documents, overall sound levels are determined by applying frequency weight adjustments to spectral sound levels. The A-scale weighting scale is used to mimic human hearing response, so sound is reported in terms of dBA. Typically, the human ear can barely perceive a change in noise level of 3 dB. A change in noise level of 5 dB is readily perceptible, and a change of 10 dB is perceived as being twice or half as loud.

## Sound Propagation

Sound is transmitted in air by pressure variations from its source to the surroundings. Sound levels will decrease as the distance between the source and the receiver increases. While absorption by air is one of the factors attributing to the weakening of a sound during transmission, distance plays a more important role in noise reduction during transmission. Depending on the source of the sound for every doubling of distance the level will be reduced between 3 and 6 dB. The reduction of a sound is called attenuation.

Other factors for noise attenuation are ground absorption and shielding. Noise models use hard site (reflective surfaces) and soft site (absorptive surfaces) to help calculate predicted noise levels. Hard site conditions assume no excessive ground absorption between the noise source and the receiver. Soft site conditions such as grass, soft dirt or landscaping attenuate noise at a rate of an additional 1.5 dB per doubling of distance.

In order to break the line of sight, walls between a noise source and a receiver are often used for noise attenuation to reduce the noise levels at the receiver. Additional barriers such as buildings, hills, and heavy vegetations can also reduce the noise levels. Typically, walls will reduce noise levels by 5–10 dB. The higher the wall is, the higher the noise reduction will be.

## Measurement of Sound

There are many ways to evaluate noise measured over periods of time. Equivalent continuous sound level (Leq) is the total sound energy measured over a stated period of time. LAs (Max) is the maximum level with A-weighted frequency response and slow time constant. The Community Noise Equivalent Level (CNEL) is the LAeq (equivalent noise level) over a 24-hour period with a penalty of 5 dB for noises occurring from 7:00 PM. to 10:00 PM and a penalty of 10 dB for noises occurring from 10:00 PM to 7:00 AM The noise penalty is added to the noise events during the evening and nighttime hours when individuals are more sensitive to noise.

### *Ground-Borne Vibration*

Vibration is periodic motion of a solid medium in alternately opposite directions from the position of equilibrium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration amplitudes. The PPV is defined as the maximum instantaneous peak or negative peak of the vibration wave. The RMS is defined as the square root of the average of the squared amplitude of the signal. PPV is the most commonly used descriptor for evaluating potential building damage, whereas RMS is generally used to assess human response. Typically, ground-borne vibration, generated by man-made activities, attenuates rapidly with distance from the source of vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 500 feet or less) from the source.

Operation of construction equipment, maintenance operations, and traffic traveling on roadways can generate ground-borne vibration. However, if the roadway is smooth, the vibration from traffic is typically not perceptible.

## COMMUNITY STANDARDS

### Noise Standards

### *West Covina, General Plan*

The PlanWC Noise Element provides guidance on improving the safety and health of the community and abatement of excessive noise. The Plan WC outlines land use compatibility standards as a guideline for locating new land uses, which have been adopted from the California Office of Noise Control.

In 1974, the EPA published a document entitled "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare With an Adequate Margin of Safety." The EPA "levels document" does not constitute a standard, specification or regulation, but identifies safe levels of environmental noise exposure without consideration for economic cost for achieving these levels. For Residential properties, the Environmental Protections Agency Noise Guidelines recommends 45 dBA $L_{dn}$ for indoor noise levels and 55 dBA $L_{dn}$ for outdoor noise levels.

The Federal Highway Administration (FHWA) has adopted and published noise abatement criteria for highway construction projects. The noise abatement criteria specified by the FHWA are presented in the PlanWC in terms of the maximum one-hour Leq. The FHWA noise abatement criteria basically establish an exterior noise goal for residential land uses of 67 Leq and an interior goal for residences of 52 Leq. The noise abatement criteria applies to private yard areas and assumes that typical wood frame homes with windows open provide 10 dB noise reduction (outdoor to indoor) and 20 dB noise reduction with windows closed.

### *West Covina, Municipal Code*

The West Covina Code of Ordinances, Chapter 15, Article IV, Section 15, establishes noise requirements for the City. Section 15-85 states that it would be unlawful for any person to make any loud, unnecessary, or unusual noise that would disturb the peace and quiet within a residential zone and that would cause discomfort or annoyance. Any noise that is plainly audible at a distance of 50 feet from any property, building, structure, or vehicle in which it is located shall be presumed to be a noise created in violation of the ordinance.

Per Chapter 26, Article X, Section 26-580, no portion of the property shall be used in such a manner as to create a nuisance to adjacent properties, such as but not limited to vibration, sound, electro-mechanical disturbance or radiation, air or water pollution, dust, emission of odorous, toxic, or noxious matter.

The Noise Ordinance (Section 15-95) prohibits any construction activities between the hours of 8 PM to 7 AM (or 6 AM for unloading and loading activities) that causes the noise level at the property line to exceed the ambient noise level by more than 5dB, unless a permit has been obtained, or in the case of emergency work as defined in the Noise Ordinance.

**Vibration Standards**

Neither the City of West Covina Municipal Code nor the PlanWC has specific and/or quantitative regulatory standards for construction or operational vibration sources. In lieu of quantified vibration criteria, impacts are defined as significant if they exceed the Federal Transit Administration's (FTA) standards for vibration (as found in "Transit Noise and Vibration Impact Assessment" [FTA 2006]). For structural damage, FTA guidelines define an impact as significant if it exceeds 0.20 inch/second for nonengineered timber and masonry buildings, and 0.30 inch/second for engineered concrete and masonry (no plaster) buildings. For vibration annoyance, an impact is defined as significant if it exceeds 78 vibration decibels (VdB) during the day at a residential receiver or if it exceeds 84 VdB at commercial/office land uses.

**SIGNIFICANCE THRESHOLDS**

For the purpose of the noise analysis the following threshold of significance were used to determine the noise and vibration impact on the nearest sensitive receptors:

**Construction Noise**

- Construction activities between the hours of 7:00 AM and 8:00 PM.
- The City of West Covina does not have a maximum numeric limit for noise levels related to construction activities at the sensitive receptors. The FTA Transit Noise and Vibration Impact Assessment provides an eight-hour construction noise level threshold of 80 dBA Leq during daytime at residential (noise-sensitive) uses, and 85 dBA during the daytime at commercial uses. Therefore, those thresholds were used to evaluate the need of mitigation measures during construction activities.

**Construction Vibration**

- 78 VdB during the day at a residential receiver.

***Off-Site Traffic***

- An increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable (Caltrans 2013).

***On-Site Operational Noise***

- Neither the West Covina Municipal Code nor the PlanWC include a quantitative noise standard relevant to operational activities associated with the proposed site. Typically, a change in noise level of 5 dB is readily perceptible and therefore may be perceived as a noise disturbance. Therefore, the proposed Project would have a significant impact related

to operational noise if operational noise levels exceed 5 dBA at the sensitive receptors near the Project site.

## EXISTING AMBIENT NOISE ENVIRONMENT

Ambient noise or background levels are the all-encompassing noises associated with a given environment at a specific time, usually a composite of sound from many sources from many directions, near and far without any particular dominant sound. The existing noise environment at the proposed facility and in the surrounding area results primarily from vehicular traffic along San Bernardino Road and Badillo Street and noises from the nearby industrial facilities. Commercial activities, including air compressors and commercial compactors, landscaping maintenance equipment and other daily activities also contribute to noise levels. No major rail lines or airports exist within City limits that would contribute to the ambient conditions.

NV5 conducted short-term and long-term noise level measurements on October 6th through 7th, 2020 at four locations in the vicinity of the proposed site. All the measurements were conducted using a Larson Davis 831c — Type 1 Sound Level Meter (SLM). The SLM was calibrated before and after each measurement of noise levels; the measurement was made using the A-weighting scale, the SML was placed 5 feet off the ground. Three 15-minute noise level measurements were taken at S1, S2, and S3 during daytime hours and analyzed with Leq. A 24-hour noise level measurement was taken at S4 and analyzed with $L_{eq}$. A 24-hour noise level measurement was taken at S4 and LAmax. At nighttime, the main sources of noise are from vehicular traffic. The maximum noise levels measures are shown in Exhibit F in Appendix F and includes noise events such as loud motorcycles accelerating.

Table 4-13 summarizes the results of the short-term measurement for each of the locations. Table 4-14 summarizes the results of the 24-hour noise level measurement.

**TABLE 4-13**
**SUMMARY OF SHORT-TERM NOISE MEASUREMENTS (DBA)**

| ID | Sample Location | Sample Time | Description | Leq (dBA) | LSmax (dBA) |
|---|---|---|---|---|---|
| 1 | 1211 Badillo Street: South Parking Lot | 8:37 AM – 8:52 AM | Noise from automobiles, motorcycles, semitrucks, airplanes, animals, and pedestrians | 67.2 | 85.8 |
| 2 | 1233 Elgenia Street | 9:10 AM – 9:25 AM | Noise from automobiles, animals, and pedestrians | 50.6 | 62.9 |
| 3 | 529 Cutler Way | 9:41 AM – 9:56 AM | Noise from automobiles, semitrucks, motorcycles, animals, trains, industrial activities, and pedestrians | 61.9 | 81.0 |

Dba: A-weighted decibels; Leq: equivalent continuous level over a period of 15 minutes; LS max: maximum level and slow time constant over a period of 15 minutes

Source: NV5 2021a.

**TABLE 4-14**
**SUMMARY OF LONG-TERM NOISE MEASUREMENTS (DBA)**

| ID | Sample Location | Sample Time | Description | Lden (dBA) | $Leq_{Day}$ (dBA) | $Leq_{Evening}$ (dBA) | $Leq_{Night}$ (dBA) |
|---|---|---|---|---|---|---|---|
| 4 | 1211 Badillo Street: West Parking Lot | 10:39 AM 10/06/2020 – 10:39 AM 10/07/2020 | Noise from automobiles, semitrucks, motorcycles, animals, airplanes, trains, industrial activities, and pedestrians | 58.7 | 55.4 | 51.7 | 50.0 |

dBA: A-weighted decibels; Lden: equivalent continuous level over a period of 24 hours with a penalty of 5 dB for noises occurring from 7:00 PM to 10:00 PM and a penalty of 10 dB for noises occurring from 10:00 PM to 7:00 AM; Leq: equivalent continuous level over a period of 1 hour; Day: 7:00 AM – 7 PM; Evening: 7 PM – 10 PM; Night: 10 PM – 7 AM;

Source: NV5 2021a.

## Impact Analysis

***Would the Project:***

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

**Less Than Significant Impact.** The potential noise impacts on the community would be associated with onsite stationary sources. Motor vehicle noise on public streets is often considered as part of the ambient noise; however, when vehicles enter a private site, they are considered as part of that site's noise sources. The trucks, vans, and associate cars activities on site could affect the closest sensitive receptors.

The impact evaluation of the Project was performed using SoundPlan Essential 5.1, an environmental noise propagation computer program that was developed to assist with noise propagation calculations for major noise sources and projects. The program calculates the sound pressure level at a location utilizing the sound emission properties of the source(s) and environmental propagation factors (sound spreading due to distance, ground affects, barriers, topography, as well as atmospheric attenuation). The program also includes a number of standardized methodologies that can be utilized to quantify the acoustic effect of these environmental factors. A 12-foot wall was added to the model on the south side of the loading docks from the southwest corner of the building to the edge of the island located south of the truck path.

The noise analysis evaluates the acoustical impact of the proposed facility on the adjacent sensitive receptors and compares it to the ambient noise levels and local noise standards to assess if any mitigation measure would be necessary to reduce the noise exposure to the community. Future community noise impacts from the onsite operations were modeled using SoundPlan Essentials 5.1 acoustical modeling software. This study focuses on the daytime and nighttime noise levels in order to determine the acoustical impact of the site on the closest receivers.

## Noise Sources

### *Vehicles Noise Sources*

The main noise sources are trucks entering and leaving the site during the day and at night and vans staging during the day. Based on the traffic count provided, the following are the noise sources related to vehicles driving on site:

**Daytime:**

- Four (4) diesel trucks would be entering and five (5) will be leaving the Project site between the hours of 7 AM and 7 PM;
- Forty-five (45) personal drivers (Flex) would be entering the site, loading, and leaving the site between 4 PM and 6 PM;
- One hundred and forty-two (142) vans would be leaving between the hours of 10 AM and 11:30 AM; and
- Forty (40) associate cars and one hundred and twenty-seven (127) DSP drivers would be coming into the site between the hours of 7 AM and 7 PM One hundred and six (106) associate cars would be leaving the site between the hours of 7 AM and 7 PM.

**Evening:**

- Three (3) diesel trucks would be entering and two (2) would be leaving the Project site between the hours of 7 PM and 10 PM;
- One hundred and forty-two (142) vans would be entering the site to park in the van parking between the hours of 7 PM and 10 PM; and
- One hundred and twenty-seven (127) DSP drivers would be leaving the site between the hours of 7 PM and 10 PM.

**Nighttime:**

- Seven (7) diesel trucks would be entering and leaving the Project site between the hours of 10 PM and 7 AM;
- There would be no van activities at nighttime; and
- Eighty-nine (89) associate cars would be coming in and twenty-three (23) would be leaving the site between the hours of 10 PM and 7 AM.

Noise sources were entered in the system as octave band sound power levels based on reference noise levels measured at a similar delivery station facility. NV5 took sound pressure level measurements with a reference distance of 50 feet in order to represent the noise levels associated with the different noise sources. The measurements included the following:

- Sound pressure levels of one truck driving and parking at the loading docks. This data is used to represent the noise levels associated with a single truck entering the site or being active at the loading dock.
- Sound pressure levels of 20 vans at the queuing area and 20 vans at the loading area. This data is used to represent the noise levels associated with 40 vans in the van queuing and staging areas.

Trucks

One area source was placed southwest of the proposed building to represent the truck activities (line haul) at the loading docks. One truck was modeled to be operating at the loading dock. One line source was placed between the truck entrance and the loading docks to model the noise from trucks driving on site. One truck was modeled to be driving on site.

Most of the truck activity is expected at night, however some truck activity would take place during the day. Therefore, trucks were modeled to be active during the day and at nighttime. Truck activities are staggered and no more than one truck is expected to be active at once on site. Trucks drivers are instructed to be quiet at nighttime and avoid the use of horns, sound system, and other noise making devices. In addition, a Yard Marshall would be in place to monitor and assist vehicle movement while on site.

Vans

One area source was placed east of the proposed building to represent 72 vans queuing and loading. While the vans are queuing and loading, the drivers turn off the engine; therefore, the noise levels for van queuing and loading only include engine ignition noises, door opening/closing, van backup alarms, and cart movements.

Employee and Van Parking

Van parking was represented by a parking area above in the eastern and southern portions of the site. The employee parking was represented by a parking area in the northwestern portion of the property. The noises associated with parking of vehicles that are accounted for in the model include engine ignition, and vehicle doors opening and closing. The traffic volume of the parking lot is entered with the number of moves per parking bay (in and out are each considered a single move), the hour (for the time slices day and night), and the number of parking bays.

The model predicted the maximum noise levels produced by the truck, vans, and employee car activities using expected noise sources from trucks, vans, and employee cars. The sources were modeled as operating at the same time to represent the worst-case scenario. Tables 4-15, 4-16, and 4-17 list the sources that were considered in the analyses and Exhibit E in Appendix F shows the locations of noise sources and the proposed building.

**TABLE 4-15**
**SOURCE SOUND POWER LEVELS IN OCTAVE BAND FORMAT**
**(DBA, RE 10-12W) – FLEETS**

| Source name | Level (dBA) | Octave Band Centre Frequency (Hz), Sound Power Levels (dBA) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | 31 | 63 | 125 | 250 | 500 | 1,000 | 2,000 | 4,000 | 8,000 |
| Van Staging | 91.8 | 18 | 41.8 | 57.5 | 68.6 | 77.9 | 86.1 | 88.4 | 84.7 | 74.8 |
| Truck Loading | 104.3 | 48.0 | 71.7 | 86.2 | 95.1 | 96.9 | 96.9 | 98.3 | 96.2 | 93.8 |
| Truck Path | 104.3 | 48.0 | 71.7 | 86.2 | 95.1 | 96.9 | 96.9 | 98.3 | 96.2 | 93.8 |
| dBA: A-weighted scale; Hz: hertz<br>Source: NV5 2021a. | | | | | | | | | | |

**TABLE 4-16**
**SOURCE SOUND POWER LEVELS – PARKING LOTS**

| Name | Size | | Movements per hour | | | Road surface | Lw, ref (dBA) |
|---|---|---|---|---|---|---|---|
| | | | Day | Evening | Night | | |
| Van parking | 626 | Parking bays | 0.178 | 0.134 | 0 | Asphaltic driving lanes | 97.8 |
| Employee Parking | 185 | Parking bays | 0.525 | 0.442 | 0.387 | Asphaltic driving lanes | 91.2 |
| dBA: A-weighted scale; Hz: hertz; Lw: Sound Power Level<br>Source: NV5 2021a. | | | | | | | |

HVAC Noise Sources

To assess the impacts created by the roof-top air conditioning units at the proposed delivery station building, data from the heating, ventilation, and air conditioning (HVAC) design package was entered for each exhaust fan and roof top unit. The HVAC units were modelled to be running continuously.

**TABLE 4-17**
**SOURCE SOUND POWER LEVELS IN OCTAVE BAND FORMAT**
**(DBA, RE 10-12W) – HVACS**

| Source Name | Reference | Level (dBA) | Octave Band Centre Frequency (Hz), Sound Power Levels (dBA) | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 63 | 125 | 250 | 500 | 1,000 | 2,000 | 4,000 | 8,000 |
| EF-1 | Lw/unit | 61.8 | 42.8 | 50.9 | 59.4 | 53.8 | 53 | 47.2 | 43 | 36.9 |
| EF-2 to 4 | Lw/unit | 69.1 | 46.8 | 55.9 | 63.4 | 63.8 | 62 | 61.2 | 54 | 44.9 |
| EF-5 | Lw/unit | 67.5 | 45.8 | 58.9 | 61.4 | 59.8 | 61 | 60.2 | 52 | 46.9 |
| EF-6 to 8 | Lw/unit | 71.7 | 52.8 | 63.9 | 65.4 | 66.8 | 64 | 60.2 | 53 | 45.9 |
| RTU1 | Lw/unit | 89 | — | — | — | — | — | — | — | — |
| RTU2 | Lw/unit | 89 | — | — | — | — | — | — | — | — |
| RTU3 | Lw/unit | 79 | — | — | — | — | — | — | — | — |
| RTU4 | Lw/unit | 94 | — | — | — | — | — | — | — | — |
| RTU5 -11 | Lw/unit | 95.2 | 78.8 | 77.9 | 87.4 | 89.8 | 90 | 86.2 | 83 | 75.9 |
| dBA: A-weighted scale; Hz: hertz; Lw: Sound Power Level<br>Source: NV5 2021a. | | | | | | | | | | |

### *Sensitive Receivers*

Sensitive receivers that may be affected by the proposed delivery station are the residences located to the north, south, and east of the site, and the elementary school located southeast of the site.

A total of seven (7) receivers were modeled to evaluate the proposed Project's operational noise impact. Receivers 1, 2, and 3 represent the residences located south of the site. Receiver 4 represents the retirement community east of the site. Receivers 5 and 7 represent the residences of the single-family homes and the apartment complex located north of the site, respectively. Receiver 6 represents the school located southeast of the site. A receiver is denoted by a yellow dot. Receivers 1, 2, 3, and 6 are one-story high and Receivers 4, 5, and 7 are two-story high.

Exhibit G in Appendix F shows the predicted noise level map at the sensitive receptor areas. Exhibits H through in Appendix F show the estimated noise level contours for the Project.

Operational noise levels are anticipated to range between 46.9–55.6 dBA during the daytime, 45.9–55.5 dBA during the evening, and between 44.7–55.5 dBA at nighttime at the nearest sensitive receivers without any noise mitigation. Table 4-18 shows the results of the noise level predictions. Noise from truck driving on site is the main noise contributor at nighttime. Table 4-19 shows the results of the noise level predictions from truck path.

## TABLE 4-18
## RECEIVER PREDICTED NOISE LEVELS

| No. | Receiver name | Building Side | Floor | Ambient Noise Levels dBA | | | | Predicted noise levels dBA | | | | Combined noise levels dBA | | | | Difference between Ambient and Combined | | | | Ambient noise levels higher than the source noise levels? | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Day | Evening | Night | Lden | Day | Evening | Night | Lden | Day | Evening | Night | Lden | Day | Evening | Night | Lden | Day | Evening | Night |
| 1 | 1109 East Elgenia Avenue | North | GF | 67.2 | 56.7 | 55.0 | 66.0 | 49.8 | 49.7 | 49.3 | 56.1 | 67.3 | 57.5 | 56.0 | 66.4 | 0.1 | 0.8 | 1.0 | 0.4 | Yes | Yes | Yes |
| 2 | 1209 East Elgenia Avenue | North | GF | 67.2 | 56.7 | 55.0 | 66.0 | 51.8 | 51.5 | 50.8 | 57.6 | 67.3 | 57.8 | 56.4 | 66.6 | 0.1 | 1.1 | 1.4 | 0.6 | Yes | Yes | Yes |
| 3 | 1247 East Elgenia Avenue | North | GF | 67.2 | 56.7 | 55.0 | 66.0 | 51 | 50.2 | 49.1 | 56.1 | 67.3 | 57.6 | 56.0 | 66.4 | 0.1 | 0.9 | 1.0 | 0.4 | Yes | Yes | Yes |
| 4 | 1350 East San Bernardino Road | West | GF | 55.4 | 51.7 | 50.0 | 58.7 | 51 | 49.6 | 46.9 | 54.5 | 56.7 | 53.8 | 51.7 | 60.1 | 1.4 | 2.1 | 1.7 | 1.4 | Yes | Yes | Yes |
| 4 | 1350 East San Bernardino Road | West | 1.FI | 55.4 | 51.7 | 50.0 | 58.7 | 51.7 | 50.6 | 48.8 | 56 | 56.9 | 54.2 | 52.5 | 60.6 | 1.6 | 2.5 | 2.4 | 1.9 | Yes | Yes | Yes |
| 5 | 1431 Cutter Way | South | GF | 61.9 | 56.7 | 55.0 | 63.3 | 55.6 | 55.5 | 55.5 | 62.1 | 62.8 | 59.2 | 58.3 | 65.8 | 0.9 | 2.5 | 3.3 | 2.5 | Yes | Yes | No |
| 5 | 1431 Cutter Way | South | 1.FI | 61.9 | 56.7 | 55.0 | 63.3 | 55.5 | 55.5 | 55.4 | 62.1 | 62.8 | 59.2 | 58.2 | 65.8 | 0.9 | 2.5 | 3.2 | 2.5 | Yes | Yes | No |
| 6 | Grovecenter Elementary School | North | GF | 67.2 | 56.7 | 55.0 | 66.0 | 46.9 | 45.9 | 44.7 | 51.7 | 67.2 | 57.0 | 55.4 | 66.2 | 0.0 | 0.3 | 0.4 | 0.2 | Yes | Yes | Yes |
| 7 | Mountain View Venture | South | GF | 61.9 | 56.7 | 55.0 | 63.3 | 51.1 | 50.2 | 49.4 | 56.3 | 62.2 | 57.6 | 56.1 | 64.1 | 0.3 | 0.9 | 1.1 | 0.8 | Yes | Yes | Yes |
| 7 | Mountain View Venture | South | 1.FI | 61.9 | 56.7 | 55.0 | 63.3 | 51.6 | 50.9 | 50.3 | 57.2 | 62.3 | 57.7 | 56.3 | 64.3 | 0.4 | 1.0 | 1.3 | 1.0 | Yes | Yes | Yes |

dBA: A-weighted scale; Lden: equivalent continuous level over a period of 24 hours with a penalty of 5 dB for noises occurring from 7:00 PM to 10:00 PM and a penalty of 10 dB for noises occurring from 10:00 PM to 7:00 AM

*The Long-Term (S4) noise levels were used as the ambient noise levels for Receiver 3 for daytime, evening, and nighttime hours. The ambient noise levels for all other receivers for evening and nighttime were determined using S4 by comparing the noise level difference during the daytime and applying the difference in the evening and at night. The Short-Term noise level of S1 was used as the daytime ambient noise levels for Receivers 1, 2, and 5. The Short-Term noise level of S3 was used as the daytime ambient noise levels for Receivers 4 and 6.

Source: NV5 2021a.

*This page intentionally left blank*

**TABLE 4-19**
**RECEIVER PREDICTED NOISE LEVELS FROM TRUCK PATH**

| No. | Receiver Name | Floor | Noise levels from truck path | | | |
|---|---|---|---|---|---|---|
| | | | Day | Evening | Night | Lden |
| 1 | 1109 East Elgenia Avenue | GF | 46.9 | 46.9 | 46.9 | 53.5 |
| 2 | 1209 East Elgenia Avenue | GF | 45.2 | 45.2 | 45.2 | 52.1 |
| 3 | 1247 East Elgenia Avenue | GF | 41.9 | 41.9 | 41.9 | 48.6 |
| 4 | 1350 East San Bernardino Road | GF | 38.7 | 38.7 | 38.7 | 45.4 |
| 4 | 1350 East San Bernardino Road | 1.Fl | 39.2 | 39.2 | 39.2 | 45.9 |
| 5 | 1431 Cutter Way | GF | 53.1 | 53.1 | 53.1 | 59.7 |
| 5 | 1431 Cutter Way | 1.Fl | 52.7 | 52.7 | 52.7 | 59.4 |
| 6 | Grovecenter Elementary School | GF | 37.9 | 37.9 | 37.9 | 44.6 |
| 7 | Mountain View Venture | GF | 44.7 | 44.7 | 44.7 | 51.3 |
| 7 | Mountain View Venture | 1.Fl | 44.1 | 44.1 | 44.1 | 50.7 |

Lden: equivalent continuous level over a period of 24 hours with a penalty of 5 dB for noises occurring from 7:00 PM to 10:00 PM and a penalty of 10 dB for noises occurring from 10:00 PM to 7:00 AM

Source: NV5 2021a.

As discussed above, the City of West Covina prohibits any noise within any residential zone of the City that is loud, unnecessary, or unusual which unreasonably disturbs the peace and quiet of any residential neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. Typically, a change in noise level of 5 dB is readily perceptible and therefore may be perceived as a noise disturbance.

The ambient noise levels were measured to be 67.2 dBA during the daytime, 56.7 dBA during the evening, and 55 dBA at nighttime for the sensitive receptors north of the site, 61.9 during the daytime, 56.7 dBA during the evening and 55 dBA at nighttime for the sensitive receptors south of the site and 55.4 dBA during the daytime, 51.7 dBA during the evening and 50 dBA at nighttime for the sensitive receptors to the east of the site. Operational outdoor noise levels are anticipated to range between 46.9–55.6 dBA during the daytime, 45.9–55.5 dBA during the evening, and between 44.7–55.5 dBA at nighttime at the nearest sensitive receivers located north, east, and south of the site. The difference between the combined noise levels, including the predicted operational noise levels and the ambient noise levels, and the ambient noise levels is expected to be between 0–1.6dB during the daytime, 0.3–2.5dB in the evening and 0.4–3.3dB at nighttime. The ambient noise levels are not expected to be raised by more than 5dB and therefore the Noise consultant has concluded that the activities on the proposed site are not expected to cause a significant impact during the daytime, evening and nighttime.

The site parking is divided in two sections: the employee parking lot would be located on the west side of the site and the delivery van parking would be at the south and east areas of the site. The employee parking lot is expected to generate noise during the daytime and nighttime, when employee shift changes occur. A maximum of 70 employees would be coming in and out of the parking lot at one time. Sensitive receptors to the east and south of the site are not expected to be impacted by noise from this activity due to the building and the proposed sound wall between the sensitive receptor and the site. Sensitive receptors north of the site are approximately 300 feet from the employee parking lot, across from San Bernardino Road. The residences are not expected to hear the activity at the employee parking lot due to distance attenuation and the high level of existing traffic on San Bernardino Road during the daytime and at night.

The van parking lot is expected to generate noise throughout the day and evening intermittently. Van drivers would enter the site in the morning between 9:00 AM and 11:00 AM and park their vehicle in the van driver parking lot located southwest of the building. They would then pick up a van in the van parking lot area (south and east portions of the site) and would drive to the staging and loading area to load their packages to deliver. Once the delivery is complete, they would return to the site and park and the van backs into the van parking lot area. Site parking attendants are often used on site during the daytime to direct traffic and to direct the van drivers to their parking area, which reduces the amount of time the van would be active on the site. Van activity is also staggered to reduce the number of vans active at once on site and limit the noise.

Vans have back up alarms, however, the staging area and loading areas are set up for forward movement to avoid using back up alarms. Back up alarms would be used if vans must back up out of their parking space. Vans are expected to be active in the parking lot between 10:00 AM and 11:30 AM and between 7:00 PM to 10:00 PM. The van parking lot has 534 parking spaces but only 142 vans are expected to be active daily. Van back up beepers were measured to be producing a noise level of 78 dBA at 20 feet. Based on distance attenuation, at 50 feet, where the closest residence east of the site is located, maximum intermittent parking lot noise events would be approximately 70 dBA and approximately 60 dBA at 150 feet where the closest residences north and south of the site are located. The parking area surrounds the building to the east and south thus, individual noise events would be spread out across the site at varying distances from the residences. Due to the staggered schedule, the large amount of parking space throughout the site and the limited used of back up alarms, those back up alarms are expected to be heard seldomly during the morning and evening.

In addition, due to the location of the site between two busy roadways and a hospital located east of Lark Ellen Village, which has an ambulance entrance just east of Lark Ellen Village residences, it is expected that a higher number of impulsive noise events already exist as part of the ambient noise and the sensitive receptors near the site (north, east and south) would not be disturbed by the site activities during the daytime and in the evening. Therefore, the Project noise analysis concludes that noise generated within the project site parking lots, is not expected to cause a disturbance for the residents to the north, east and south of the site.

Trucks at the Project site would also utilize backup alarms during loading/unloading activities. Backup alarms produce a typical noise level of 97 dBA at 1meter (3.8 feet). Based on distance attenuation, at 350 feet, where the closest residence south of the site is located, backup alarms noise levels would be approximately 56 dBA and 52 dBA at 550 feet, where the closest residence north of the site is located. The 12-foot high wall located south of the loading docks would provide approximately 5 dB additional attenuation to the residences south of the site. Residences north of the site would be partially shielded by the building. Existing noise in the vicinity of the site include truck noise, and vehicular traffic noise including loud motorcycles. Based on the maximum noise levels measured in the vicinity of the site, between 73 dBA and 86 dBA, and the ambient noise level of 55 dBA measured at nighttime, trucks backup alarms are not expected to cause additional disturbance for the residences north and south of the site.

The PlanWC requires evaluations of the outdoor noise impact; however indoor noise impact was also evaluated in this analysis to assess the risk of possible noise disturbance due to night activities at the site. The main activity at night would be trucks entering the site and driving to the loading docks. Truck arrival would be staggered so not more than one truck would be driving at once on the property. Based on the 20dB reduction from windows closed mentioned in the General Plan, the indoor noise levels from truck path would be between 17.9 dBA and 33.1 dBA at the nearest sensitive receptors. The World Health Organization, in the Guidelines for Community Noise (April 1999), provides guidance for indoor noise levels related to sleep disturbance. If the noise is continuous, a maximum indoor noise level of 30 dBA should not be

exceeded. If the noise is not continuous, noise events exceeding 45 dBA should be limited. The noise from trucks driving on site would be limited to about 5 minutes per hour and is not expected to exceed 33.1 dBA at the residences located north, east, and south of the site. In addition, the ambient noise levels are expected to be higher throughout the night than the operational noise levels. Therefore, it is not expected that residents would be disturbed by the truck activities.

Therefore, the site's operational noise impacts have been determined to be less than significant.

Two 12-foot high screen walls would be constructed, one south of the approach driveway and adjacent to the loading dock area (525 feet including a 26-foot wide gate) and one north of the loading dock area (271.9 feet including a 26-foot wide gate). The material for the 12-foot high walls includes a standard Concrete Masonry Unit, which is to be painted a matching color to the main building. Additional mitigation measures would not be necessary for this site with the current concept plan.

**Off-Site Traffic Noise Impacts**

Offsite Traffic noise was assessed using the FHWA Traffic Noise Model Version 3.0 (TNM 3.0). TNM 3.0 is a computer model released in 2020. Key inputs to the traffic noise model were roadway widths, traffic mix, and speed. Noise levels were modeled for the Project site for Existing (2020) and Existing Plus Project.

***Off-Site Traffic Noise Prediction Model Inputs***

The Project would generate traffic along adjacent roads including San Bernardino Road and Badillo Street. Table 4-20 identifies the 4 roadway segments and the posted vehicle speeds.

**TABLE 4-20**
**OFF-SITE ROADWAYS**

| ID | Roadway | Segment | Receiving Land Use[1] | Vehicle Speed (mph)[2] |
|---|---|---|---|---|
| 1 | West San Bernardino Road | Westbound – North Lark Ellen Ave to North Vincent Ave | Sensitive | 45 |
| 2 | West San Bernardino Road | Eastbound – North Vincent Ave to North Lark Ellen Ave | Sensitive | 45 |
| 3 | Badillo Street | Eastbound – North Vincent Ave to North Lark Ellen Ave | Sensitive | 45 |
| 4 | Badillo Street | Westbound – North Lark Ellen Ave to North Vincent Ave | Sensitive | 45 |

[1] Noise sensitive uses limited to noise sensitive residential land uses
[2] Vehicle Speed Posted
Source: NV5 2021a.

The Average Daily Traffic (ADT) used in this study is presented in Table 4-21 based on the traffic analysis done by NV5 for this Project for the following scenario: Existing (2021) and Existing + Project (2021). The ADT varies for each roadway segment based on the existing traffic volumes and the combination of Project traffic distributions.

**TABLE 4-21**
**AVERAGE DAILY TRAFFIC VOLUMES WITH TIME OF DAY AND VEHICLE SPLITS**

| | | Existing (2021) | | Existing + Project (2021) | | Increase | |
|---|---|---|---|---|---|---|---|
| | | San Bernardino Road | Badillo Street | San Bernardino Road | Badillo Street | San Bernardino Road | Badillo Street |
| ADT | | 16,000 | 19,000 | 16,772 | 19,142 | 5% | 1% |
| Daytime (7 AM – 7 PM) | Cars/Passenger Vehicles | 12,920 | 15,827 | 13,425 | 15,827 | 4% | 0% |
| | Medium Trucks | 544 | 323 | 544 | 323 | 0% | 0% |
| | Heavy Trucks | 136 | 0 | 145 | 0 | 6% | 0% |
| Evening (7 PM – 10 PM) | Cars/Passenger Vehicles | 912 | 1,117 | 1,039 | 1,259 | 12% | 11% |
| | Medium Trucks | 38 | 23 | 38 | 23 | 0% | 0% |
| | Heavy Trucks | 10 | 0 | 15 | 0 | 34% | 0% |
| Night (10 PM – 7 AM) | Cars/Passenger Vehicles | 1,368 | 1,676 | 1,480 | 1,676 | 8% | 0% |
| | Medium Trucks | 58 | 34 | 58 | 34 | 0% | 0% |
| | Heavy Trucks | 14 | 0 | 28 | 0 | 50% | 0% |
| Source: NV5 2021a. | | | | | | | |

The traffic volumes were taken by National Data & Surveying Services (NDS). 24-hour volume and classification counts were taken on Badillo Street and San Bernardino Road between Vincent Ave and Lark Ellen Ave on March 2, 2021. NV5 adjusted the volumes using factors developed for the Traffic Impact Study to account for COVID's impact on traffic volumes. The resulting daily volumes are in line with historic counts and anticipated growth (between the years the historic counts were taken and 2021).

**Off-Site Traffic Noise Impact**

The noise levels from off-site transportation sources were modeled including only vehicular noise on area roadways and do not include noise contributions from the surrounding stationary noise sources within the Project area.

Three main receivers were modeled to be representative of the sensitive receivers near the site:

- One receiver at 1431 Cutter Way representative of residences along West San Bernardino Road.
- One receiver at the Lark Ellen Village Apartments representative to the residence east of the Project site.
- One receiver at 1209 East Elgenia Avenue representative of the residences along Badillo Street.

Table 4-22 presents the CNEL noise levels at the sensitive receptors for the Existing conditions and Existing + Projects conditions. As shown in Table 4-22, the Project off-site traffic noise level would result in a maximum 0.4 dB increase of noise levels.

Therefore, increased traffic noise would be less than significant, and no mitigation is required.

**TABLE 4-22**
**TRAFFIC NOISE LEVELS**

| Modeled Receptor | Distance to Centerline | Key Roadway Segment | Existing Noise Level (dBA CNEL) | Existing + Project Noise Level (dBA CNEL) | Noise Level Increase (dB) |
|---|---|---|---|---|---|
| Residences on West San Bernardino Road | 80 feet | W San Bernardino | 65.6 | 66.0 | 0.4 |
| Residences at Lark Ellen Village Apartments | 260 feet/ 450 feet | W San Bernardino/Badillo Street | 59.9 | 60.3 | 0.4 |
| Residences on Badillo Street | 70 feet | Badillo Street | 66.8 | 66.8 | 0 |
| dBA: A-weighted scale; CNEL: Community Noise Equivalent Level; dB: decibel<br>Source: NV5 2021a. | | | | | |

## Construction Noise

This section analyzes the potential exposure to noise and evaluates the impacts resulting from the short-term construction activities associated with the renovation and improvement of the Projects existing building on the site. The work entails demolition of existing parking lot, site preparation, rough and fine grading, paving, landscaping, installation of light poles, and signage.

To assess the potential for short-term construction noise impacts, three representative sensitive receiver locations, were identified as shown in Table 4-24. All distances are measured from the center of the Project site to the outdoor living areas (e.g., private backyards) or at the building facade, whichever is closer to the Project site. Other sensitive land uses in the Project study area that are located at greater distances than those identified in the noise study would experience lower noise levels due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary for each phase to each receiver location. Refer to Table 4-24 for the distances of the sensitive receptors to the equipment.

### *Construction Noise Sources*

Construction is anticipated to start November 2021 and last until April 2022. Construction activities would take place from 7 AM to 8 PM which is within the City's allowable construction hours and would be temporary in nature. Noise impacts from the construction activities were evaluated by estimating the typical noise levels for each type of construction equipment using the Federal Highway Administration (FHWA) roadway construction model (RCNM) and comparing the Leq at the nearest sensitive receptors with the ambient noise levels from the field measurement (see Table 4-23). Construction equipment usage was estimated, as shown in Table 4-23. Each type of construction equipment produces a maximum noise levels (Lmax) at a reference distance of 50 feet from the noise source.

**TABLE 4-23**
**MAXIMUM NOISE LEVELS AND ESTIMATED USAGE OF TYPICAL CONSTRUCTION EQUIPMENT**

| Type of Equipment | Estimated Usage (%) | Lmax at 50 Feet (dBA) |
|---|---|---|
| Backhoe | 40 | 77.6 |
| Excavator | 40 | 80.7 |
| Front End Loader | 40 | 79.1 |
| Soil Compactor | 20 | 83.2 |
| Grader | 40 | 85 |
| Paver | 50 | 77.2 |
| dBA: A-weighted decibel<br>Source: NV5 2021a. | | |

Using the RCNM, the noise levels were calculated for nearest sensitive receptors from the construction equipment, as presented in Table 4-24.

**TABLE 4-24**
**PREDICTED CONSTRUCTION NOISE LEVELS AT THE NEAREST SENSITIVE RECEPTORS**

| No. | Receiver Name | Receiver Location | Distance to Equipment | Daytime Ambient Noise Levels (dBA) | Predicted Noise levels Leq (dBA) | Significant Impact? |
|---|---|---|---|---|---|---|
| 1 | 1431 Cutler Way | 150 feet northeast of the site | 500 | 61.9 | 64.7 | No |
| 2 | 1350 East San Bernardino Road | 30 feet east of the site | 220 | 55.4 | 71.9 | No |
| 3 | 1209 East Elgenia Avenue | 100 feet south of the site | 350 | 67.2 | 67.8 | No |
| dBA: A-weighted decibel<br>Source: NV5 2021a. | | | | | | |

**Construction Noise Impact**

Construction activities for this Project is expected to be light as the anticipated improvements are to an existing building. As shown in Table 4-24, the predicted noise levels at residences northeast, east, and south of the site would be less than 80 dBA. In addition, construction activities would only take place during the daytime between 7 AM and 8 PM.

Therefore, construction noise impacts would be less than significant and no mitigation is required.

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

**Less Than Significant Impact.** The City of West Covina has not adopted significance thresholds for vibration. Vibration may be expressed through a number of parameters that describe the displacement, the vibration velocity, or acceleration experienced by an object. The construction activities for this Project are expected to be limited to light construction in the parking lot areas. The construction equipment is not expected to come within 100 feet to the residences on the east

of the site. North and south of the site, the construction equipment would not be within at least 200 feet from the closest residences.

Loaded trucks or similar construction equipment could create vibration levels of 86VdB at 25 feet. At 100 feet, loaded trucks would create vibration level of 68VdB which would be below the nuisance threshold. Other construction equipment expected to be used as part of this Project has lower vibration levels and therefore, would not be a nuisance.

Therefore, vibration impacts would be less than significant and no mitigation is required.

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

**No Impact.** The Project site is located approximately 6 miles east of the San Gabriel Valley Airport and Brackett Field Airport is located 7.90 miles east of the Project Site. The Project site is also located well outside the existing and projected 65 dBA CNEL noise contour, which would occur within 2 miles of an airport. Aircraft overflights do not significantly contribute to the noise environment at the Project site. In addition, the Project site is not located within the vicinity of a private airstrip. Therefore, the Project would not result in exposure of people working onsite to excessive noise levels from either airport or airstrip related activities and no mitigation is required.

**Regulatory Requirements**

None required.

**Mitigation Measures**

Project implementation would not result in significant impacts related to noise; therefore, no mitigation measures are required.

## 4.14 POPULATION AND HOUSING

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☒ | ☐ |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

### Impact Analysis

***Would the Project:***

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

**Less than Significant Impact.** The proposed Project involves the repurposing of the 21.22-acre Project site including the existing 177,440 sf industrial building and surface parking lot for an Amazon delivery station. The Project is anticipated to create both short-term construction and long-term operation related employment on the site. Jobs that would be created during construction would be short-term and would be typically filled by existing residents in the region. The short-term construction employment would not increase the City's job base permanently, nor induce housing demand near the Project site.

The proposed Project would employ an estimated 250 employees for long-term operations. However, the Project's estimated jobs would represent a negligible amount of the total employment growth projected in the City. The Project's employment growth accounts for approximately 0.6 percent of the total employment of 45,300 within the City of West Covina as of January 2021 (EDD 2021). Therefore, while the Project would result in new employment on-site, the growth is not such that would induce new population growth in the City. Additionally, the proposed Project would not include new residential uses or a housing component.

Additionally, the proposed Project functions as an infill project and is served by existing roads and utility infrastructure. No extension of roads or infrastructure is proposed by the Project such that would encourage development levels beyond what is already planned elsewhere in the City or indirectly induce growth. Therefore, the Project would not result in substantial unplanned population growth, directly or indirectly. The impacts would be less than significant, and no mitigation is required.

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

**No Impact.** The 21.22-acre Project site is currently developed with a 177,440-sf industrial building and surface parking lots. There are no existing housing and associated residents on the site that would be displaced by the repurposing of the site. Thus, no impact related to displacement of housing and related residents would occur, and no replacement housing is required. Therefore, no significant impacts would occur, and no mitigation is required.

## Regulatory Requirements

None required.

## Mitigation Measures

Project implementation would not result in significant impacts related to population and housing; therefore, no mitigation measures are required.

## 4.15 PUBLIC SERVICES

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| i) Fire protection? | ☐ | ☐ | ☒ | ☐ |
| ii) Police protection? | ☐ | ☐ | ☒ | ☐ |
| iii) Schools? | ☐ | ☐ | ☒ | ☐ |
| iv) Parks? | ☐ | ☐ | ☒ | ☐ |
| v) Other public facilities? | ☐ | ☐ | ☒ | ☐ |

### Impact Analysis

***Would the Project:***

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

***i) Fire protection?***

**Less Than Significant Impact**. Fire protection services for the Project site is provided by the West Covina Fire Department (WCFD), which maintains and operates five stations in the City. The 24-hour protection is provided by trained and qualified personnel on duty at the five fire stations serving the City. Fire equipment is distributed throughout the City from these 5 fire stations. Fire Station 3, located at 1433 West Puente Avenue, is the closest station and would provide fire response to the Project site.

Development of the Project uses could potentially increase the demand for fire protection and emergency services and the associated apparatus, equipment, and personnel compared to existing levels. Implementation of the Project is not expected to have significant impact on fire protection services that would result in the need for new firefighters and personnel, nor would it require the construction of new or the alteration of existing fire protection facilities to maintain an adequate level of fire protection service in the City.

The proposed Project would be required to comply with all applicable codes, ordinances, and regulations (including the City's Municipal Code) regarding fire prevention and suppression measures, fire hydrants and sprinkler systems, emergency access, and other fire safety requirements (see RR PS-1). The internal on-site drive aisles would serve as fire access lanes and would be designed to meet WCFD access width and turnaround requirements pursuant to the City's Fire Code. (see RR PS-1).

Development of the proposed Project would comply with all applicable code and ordinance requirements including but not limited to access, water mains, fire flows, and fire hydrants. In addition, the proposed Project would be required to pay all applicable Development Impact Fees (DIFs) including police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as outlined in RR PS-2. Therefore, the Project's potential impacts on public services pertaining to fire protection services would be less than significant, and no mitigation is required.

***ii) Police protection?***

**Less than Significant Impact**. The West Covina Police Department (WCPD) provides a full range of police services within two Divisions, the Patrol Division and the Investigative & Support Services Division. The WCPD headquarters is in the West Covina City Hall at 1444 West Garvey Avenue. The City is organized into four service areas: Service Area 1 (North), Service Area 2 (East), Service Area 3, (Central), and Service Area 4 (South). The WCPD currently has an authorized workforce of 100 sworn officers, and patrols within the City are organized in a beat system for strategic deployment. Based on the City's 2020 population of 105,999, the WCPD has a ratio of 0.85 sworn officers for each 1,000 residents in the City (DOF 2020; West Covina 2021). Each Service Area is assigned a Lieutenant, so that non-emergency public concerns are quickly addressed (West Covina 2016b). The Project site is located within the WCPD Service Area 1, (North).

Emergency access to the site by police/security vehicles is not anticipated to be impeded. The proposed Project would implement a Traffic Control Plan (refer to Section 3.17, Transportation), and on-site emergency access to structures would be in compliance with applicable codes, ordinances, and standard conditions, including the current edition of the California Fire Code. Incremental demand of the Project for police protection services is not anticipated to increase WCPD response times to the Project site or surrounding area. The net increase in demand for police protection services is also not anticipated to generate the need for new sworn officers, nor would it require construction of new or physically altered police protection facilities to maintain an adequate level of service to the Project site and surrounding areas. In light of the above, implementation of the proposed Project would not require new or physically altered WCPD facilities that would cause significant environmental impacts.

The proposed Project would comply with all applicable codes, ordinances, and requirements related to safety and payment of DIFs. In accordance with Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, the Project Applicant would pay the applicable police facility fee (see RR PS-2). Compliance with City regulations and payment of DIF's would reduce Project impacts on police protection services. Therefore, the Project's potential impacts pertaining to police protection services would be less than significant and no mitigation is required.

***iii) Schools?***

**Less Than Significant Impact.** The West Covina Unified School District (WCUSD) serves over 14,000 students in 15 public elementary and high schools and two charter schools within the City. The proposed Project would not involve development of a residential component that would result in a direct increase/generation of population, such that would increase demand on the existing school system in the area. Therefore, it is not expected that schools in the vicinity of the Project site would be impacted by increased demand during construction and operation of the proposed Project.

Similar to other developments in the area, the proposed Project would be required to pay DIF's to the WCUSD (see RR PS-3) as provided under Section 17620 of the *California Education Code*

and Section 65970 of the *California Government Code.* Thus, impacts would be less than significant, with implementation of RR PS-3 and no mitigation is required.

***iv) Parks?***

**Less Than Significant Impact.** The proposed Project does not involve the development of new residential uses or include a housing component that would result in a direct increase/generation of population, and thus, would not increase demand for parks and use of the existing parks and recreational facilities serving the City. However, the proposed Project would generate a relatively small number of employees including short-term construction and long-term operational workers. As discussed in Section 4.14, Population and Housing, these positions would likely be filled by the local labor pool. Therefore, it is not expected that parks and recreation facilities in the vicinity of the Project site would be impacted by construction workers and future employees.

The Project Applicant would be required to pay a park fee as set forth in section 26-204 of Chapter 26, Article VI, of the City's Municipal Code (RR PS-4). Additionally, the Project Applicant would be required to pay all applicable DIFs, including park facilities, as outlined in RR PS-2. Given the nominal increase in population and payment of park fees (RR PS-2 and RR PS-4), the potential impact pertaining to increased demand for parks and use of existing parks would be less than significant, and no mitigation is required.

***v) Other public facilities?***

**Less Than Significant Impact.** The West Covina Library provides library services in the City of West Covina and is located at 1601 West Covina Parkway. This library has books and media collections for children, teens, and adults. West Covina Library is part of the Los Angeles County Libraries (LA County Library 2020). Library members are also able to access other nearby Los Angeles County Public Libraries. Members of the West Covina Public Library have access to the resources of the entire Los Angeles County Public Library system (City of West Covina 2016b).

The proposed Project does not include a residential component that would increase/generate population, such that would result in increased demand on the existing libraries serving the City. However, the proposed Project would generate a relatively small number of employees, including short-term construction work and long-term employees. As discussed in Section 4.14, Population and Housing, these positions would likely be filled by the local labor pool. Therefore, it is not expected that libraries in the vicinity of the Project site would be impacted by construction and operation of the proposed Project. The proposed Project would not result in construction of new or physically altered library facilities. There would be a less than significant impact, and no mitigation is required.

**Regulatory Requirements**

**RR PS-1** The Project shall be designed and constructed in accordance with applicable regulations in Chapter 10, Fire Prevention and Protection, of the City of West Covina Municipal Code.

**RR PS-2** Pursuant to Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, prior to issuance of each building permit, the Project Applicant shall be responsible for payment of the City's Development Impact Fees (DIFs) including police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as appropriate and in amounts established by City Council Resolution. The fees paid shall be those in effect at the time of issuance of the

building permit, subject to applicable fee credits for community facilities provided as part of the Project.

**RR PS-3** The Project Applicant shall pay the applicable school development fee to the West Covina Unified School District, in accordance with Section 17620 of the California Education Code.

**RR PS-4** The Project Applicant shall pay the applicable park fee, in accordance with Chapter 26, Article VI, Section 2620 for the purpose of park and recreational facilities.

**Mitigation Measures**

Project implementation would not result in significant impacts related to public services; therefore, no mitigation measures are required.

## 4.16 RECREATION

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☒ | ☐ |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | ☐ | ☐ | ☐ | ☒ |

### Impact Analysis

***Would the Project:***

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

**Less Than Significant Impact.** The City's Community Services Division provides for the protection and enhancement of City parks, recreation facilities, and community services. The City of West Covina contains a range of park types that include two small pocket parkettes, eight neighborhood parks, three community parks, two wilderness areas, specialized sports facilities, paseos, and two conservation areas.

The proposed Project does not involve the development of new residential uses or include a housing component that would result in a direct population growth, and thus, would not increase demand on the existing parks and recreational uses serving the City. However, the proposed Project would generate a relatively small number of employees including short-term tenant improvement crews and long-term Amazon delivery staff members. As discussed in Section 3.14, *Population and Housing* in this IS/MND, these positions would likely be filled by the local labor pool. Therefore, it is not expected that parks and recreation facilities within the vicinity of the proposed Project site would be impacted by tenant improvements and operation of the Project. Additionally, the Project would not result in the need for new or physically altered facilities. Therefore, no significant impacts pertaining to use of existing parks causing their deterioration would occur. As stated in RR PS-2, the Project Applicant would be responsible for paying park facilities impact fees for the development of new or expanded park facilities in the City. Impacts would be less than significant, and no mitigation is required.

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

**No Impact.** As described above, the proposed Project does not involve the development of new residential uses or include a housing component that would result in a direct population growth, and thus, would not increase demand on the existing parks and recreational uses serving the City. Additionally, the proposed use is a delivery distribution facility, and the Project does not include recreational facilities, nor does it require construction or expansion of recreational facilities. Impacts would be less than significant, and no mitigation is required.

## Regulatory Requirements

**RR PA-2**, in Section 4.15, Public Services, would be applicable to this section.

## Mitigation Measures

Project implementation would not result in significant impacts related to recreation; therefore, no mitigation measures are required.

## 4.17 TRANSPORTATION

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

The Transportation section is based upon a June 22, 2021, Traffic Impact Study (TIS) prepared NV5 and included in Appendix G of this IS/MND. The TIS was prepared to determine the amount of traffic expected to be added to the adjacent roadway network due to the Project and identify any improvements necessary to mitigate the impacts of any additional traffic. To complete this determination, NV5 has conducted the following tasks:

- Conducted inspections of the site and surrounding roadway network to obtain an existing inventory of the roadway geometry, traffic control, and surrounding land uses;
- Determined existing traffic conditions by performing intersection turning movement counts at key intersections in the vicinity of the proposed Project during the weekday morning and weekday evening peak hours as well as the peak hour of the proposed site;
- Estimated the amount of traffic to be generated by the proposed development utilizing tenant supplied trip data for the intended operation of the site;
- Distributed this traffic throughout the study area based on the site's anticipated general service area and the resident locations of the area's employees from the 2010 census;
- Completed capacity analyses for No-Build (2021), Build (2021), and Cumulative Build (2021) Conditions throughout the study area;
- Evaluated on-site parking, access, and circulation;
- Determined Project consistency with adopted policies, plans, and programs regarding active transportation or public transit facilities; and
- Evaluated potential VMT impacts.

### SITE LOCATION AND STUDY AREA BOUNDARIES

The scope of the TIS was based on the City of West Covina's TIA Guidelines, adopted in September 2020, and additional coordination with the City as well as the cities of Covina and Baldwin Park. The TIS study includes analysis of the No Build, Build, and Cumulative Build conditions at the following intersections:

1. San Bernardino Road at Vincent Avenue;
2. San Bernardino Road at Cutter Way;

3. San Bernardino Road at Lark Ellen Avenue;
4. San Bernardino Road at Rimsdale Avenue;
5. San Bernardino Road at Azusa Avenue;
6. Badillo Street at Vincent Avenue;
7. Badillo Street at Lark Ellen Avenue;
8. Badillo Street at Rimsdale Avenue; and
9. Badillo Street at Azusa Avenue.

In additional to site's driveway opposite Cutter Way, four site driveways on Badillo Street (D1 – D4) as well as two site driveways (D5 – D6) on San Bernardino were evaluated for operational and queueing estimate purposes.

**SITE DESCRIPTION AND OPERATIONAL SUMMARY**

The site is accessed from Badillo Street via four driveways and San Bernardino Road via three driveways. The two westernmost driveways on Badillo Street have full access with left turn lanes carved from the landscaped median. The other two are restricted to right turns. All three driveways on San Bernardino Road currently have full access, but none feature a left-turn lane from San Bernardino Road. The easternmost of these driveways would be restricted to right turns and the central driveway would be limited to exiting delivery vehicles.

The site is proposed for conversion to a parcel delivery station for an e-commerce company. Existing parking areas would be restriped, and barriers erected to separate truck traffic from passenger traffic beyond the westernmost driveway to San Bernardino Road. A total of 811 parking spaces would be provided, 185 for passenger vehicles, and 626 for vans (and van drivers). Eight loading docks would be located on the west side of the building and would also be divided from delivery driver and vehicle parking areas and more importantly Badillo Street by physical barriers. A hardscaped (or partially paved) courtyard on the east side of the building would be converted to stage delivery vehicles prior to entering the east side of the building for loading. Access to the site is proposed at seven existing driveways. The westernmost driveway on San Bernardino Road would be shifted east to align with Cutter Way, and a new left turn pocket and a traffic light will be installed on San Bernardino . To accommodate the left turn pocket, some on-street parking spaces may be eliminated. The middle driveway on San Bernardino would be shifted west to operate as an exclusive exit only for delivery vehicles.

The facility would operate 24 hours a day, 7 days a week. Employee and delivery shifts are designed to avoid typical commuting peak periods. Typically, 14 line-haul (tractor trailer) trucks per day would deliver packages from a larger sorting facility about 20 miles southeast of the site. Most of these trucks (11) would arrive and depart after the evening commuting peak period and before the morning peak commuting period. The remainder would be spread throughout the day. Typically, the only site traffic during the AM commuting period is one of these trucks. All trucks would access the site through the westernmost driveway on San Bernardino Road. Employees (excluding delivery drivers) would arrive in shifts. They would use the same driveway as the line-haul trucks. Delivery drivers begin arriving as much as 90 minutes prior to the scheduled departure of the delivery vans to prepare for their routes and load in an efficient manner. Drivers can access the site via either the easternmost driveway on San Bernardino Road or any of the four on Badillo Street but would park on the western side of the site. No left turns into either the eastern driveway or middle driveway on San Bernardino Road are proposed. As scheduled, they would line up before entering the building to load. Delivery vans begin exiting the site mid-morning via the exclusive exit to San Bernardino Road. They typically return to the site beginning around

7:00 PM entering via either the easternmost driveway on San Bernardino Road or any of the four on Badillo Street. Drivers park the vans and exit with their personal vehicles through these driveways as well. Flex drivers and possibly a line-haul truck are the only vehicles accessing the site during the typical PM commuting peak. Flex drivers enter and exit the site as if they were delivery vans.

**EXISTING SURFACE TRANSPORTATION NETWORK**

**SAN BERNARDINO ROAD** is a four to five lane divided east-west route with on-street parking where pavement width and side street or driveway sight requirements allow. West of the site, it features a two-way-left-turn-lane and no on-street parking. Along the site's frontage and further eastward, where pavement is not required for travel lanes, on-street parking is allowed. Near the site, land uses vary from single family residential to industrial uses. The posted speed limit is 40 miles per hour (MPH). Sidewalks are available on both sides of San Bernardino Road. San Bernardino Road provides the only truck access for the site.

**BADILLO STREET** is a four-lane divided east-west arterial with a raised, landscaped median. The median has openings at signalized intersections and more significant side streets and driveways. West of Lark Ellen Avenue, it is posted at 40 MPH, while to the east it is posted at 45 MPH. It also has sidewalks along both sides and some on-street parking is allowed adjacent to the westbound lanes. Parking is prohibited along the south side of Badillo Street in the vicinity of the site. Single family homes dominate development on the south side of Badillo Street while development along the north side varies from multi-family residential to industrial uses.

**VINCENT AVENUE** is a north-south route with four travel lanes. South of San Bernardino it is divided by a raised median and alternating left-turn lanes. Sidewalks are available on both sides of Vincent Avenue. North of San Bernardino Road it is posted at 40 to 45 MPH. South of San Bernardino Road it is posted at 35 MPH.

**LARK ELLEN AVENUE** is a four-lane north-south route with left-turn lanes at major cross streets and on-street parking where pavement width allows. Both sides of the street have sidewalks and the posted speed limit is 40 MPH. Land uses along Lark Ellen Avenue are primarily residential and institutional.

**RIMSDALE AVENUE** is a two-lane north-south local street beginning about a block north of San Bernardino Road and ending at Badillo Street. It connects a gated multi-family residential development to Vincent Avenue, but is largely developed with commercial uses. It is also lined with sidewalks and has a regulatory speed limit of 25 MPH.

**AZUSA AVENUE** is a four-lane north-south divided State Highway (SR-39). It has a posted speed limit of 40 MPH and sidewalks along both sides. It is generally developed with commercial uses but has a pocket of residential uses just south of Badillo Street.

## METHODOLOGY AND THRESHOLDS

The City of West Covina and the City of Covina use the Intersection Capacity Utilization (ICU) methodology to evaluate signalized intersection operations but different standards for lane capacities and clearance/lost time intervals. To be most conservative, the City of Covina's lane use capacities (1,600/lane) and the City of West Covina's clearance/lost time intervals (0.100) were used in the analysis. Both Cities use the Highway Capacity Manual (HCM) methodology to evaluate unsignalized intersections. The City of West Covina has adopted Level-of-Service (LOS) E, and the city of Covina LOS D as acceptable. Furthermore, within the City of West Covina if a Project increases the volume/capacity (V/C) ratio at a signalized intersection by two percent or more and the intersection's LOS drops from E to F the City may require improvements or other strategies to reduce the V/C ratio to acceptable levels. At unsignalized intersections the City may also require improvements if the LOS degrades from E to F or if an intersection is already operating at LOS F and the Project increases the total peak hour volume by ten percent or more. The City of Covina considers improvements if an intersection LOS degrades to LOS F and the Project increases the V/C ratio by one percent. Table 4-25 summarizes the LOS criteria for both Cities.

**TABLE 4-25**
**LEVEL OF LEVEL OF SERVICE (LOS) CRITERIA**

| LOS | Signalized Intersection (V/C) | Unsignalized Intersection (Delay in sec/veh) | Description |
|---|---|---|---|
| A | ≤0.600 | ≤10.0 | EXCELLENT. Operations with very low delay and most vehicles do not stop. |
| B | >6.000 to ≤0.700 | >10.0 to ≤ 15.0 | VERY GOOD. Operations with good progression but with some restricted movements. |
| C | >7.000 to ≤0.800 | >15.0 to ≤ 25.0 | GOOD. Operations where a significant number of vehicles are stopping with some backup and light congestion. |
| D | >8.000 to ≤0.900 | >25.0 to ≤ 35.0 | FAIR. Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines. |
| E | >9.000 to ≤1.000 | >35.0 to ≤ 50.0 | POOR. Operations where there is high delay, extensive queuing, and poor coordination. |
| F | >1.000 | >50.0 | FAILURE. Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection. |

V/C: volume/capacity; sec/veh: seconds per vehicle
Source: NV5 2021b.

The City of West Covina has also adopted criteria for evaluating VMT for determination of traffic related CEQA impacts. These include project screening criteria, use of the SGVCOG VMT Evaluation Tool, and travel demand modeling. Where a project does not satisfy the screening criteria, the City has adopted a threshold of fifteen percent less than the SGVCOG baseline VMT/service population for determination of significance.

It is noted that the Faith Church, including the school, generated trips for which credit could be obtained for the proposed Project. However, typical weekday trip volumes for the church and school are not available due to the pandemic precautions and closures. Thus, a comparison could not be conducted between the existing and anticipated traffic volumes for the site. Therefore, a VMT and a full trip generation analyses are provided. This is considered a conservative approach.

**Traffic Counts and Adjustments**

As a result of Covid-19, vehicle trips have fallen considerably across the country. To account for this, historic turning movement counts (TMCs) were gathered at several study intersections from 2019 and compared to newly collected 2021 TMCs. The comparison indicated the 2019 AM peak hour traffic was 124 percent greater than the 2021 AM peak hour traffic and that the 2019 PM peak hour traffic was 25 percent greater than the 2021 PM peak hour traffic. The difference in the comparisons between the AM peak hours and the PM peak hour is likely due to the absence of school traffic in 2021. The difference in the PM peak hours is more consistent with daily traffic comparisons between pre-pandemic and pandemic conditions. TMCs were modified to reflect additional traffic that would have been present in 2021 by applying percentage-based adjustments and increasing the volumes to reflect two years of growth at one percent annually. Left turns onto Cutter Way were also adjusted during the AM Peak Hour of the adjacent street to reflect a volume closer to that counted in 2019. Newly collected traffic data and application of these adjustment is documented Appendix G.

**Analysis Time Periods**

The proposed Project generates the most trips outside the typical peak hour commute periods. The AM (10:00 – 11:00) and PM (8:00 – 9:00) peak hours of the generator are included in the analysis along with the peak hours of the adjacent street network. Adjusted peak hour volumes are displayed in Figures 5 and 6 of Appendix G.

**Adjacent Development**

Traffic estimated for the proposed 529 Cutter Way Live/Work Project, as documented in its Transportation Impact Study dated September 10, 2020, was included as existing traffic in 2021, even though that project is not anticipated to be built out until 2023. That development's traffic is shown in Figure 7 of Appendix G.

**No Build Traffic**

No Build 2021 traffic is illustrated in Figures 8 and 9 of Appendix G and includes the adjusted turning movement counts and the proposed 529 Cutter Way residential development traffic.

**Impact Analysis**

***Would the Project:***

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

**Less Than Significant With Mitigation Incorporated.** The operations of this site are unique and do not match any land uses included in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 10th Edition, 2017. The Applicant provided trip generation data that reflects a more accurate estimate of the traffic to be generated by the delivery station. Table 4-26 summarizes the delivery station's anticipated trip generation characteristics by vehicle type or purpose for the peak hours of the adjacent street and peak hours of the site (or generator). Hourly summaries of trips by purpose and vehicle type, along with a comparison to trip rates from other sites in California are provided in Appendix G. Employee and van driver trips are based on 10 percent using transit or other ride sharing opportunities, walking, or biking to work. This is based on an analysis of available transit schedules and stop locations compared to employee and driver shifts, as well as area transit usage (pre-COVID-19). Further documentation of this

assumption is also included in Appendix G. Note that flex drivers do not return to the site after deliveries are complete.

**TABLE 4-26**
**PROJECT TRIP GENERATION**

| Time Period | Employees | | Trucks | | Drivers | | Vans | | Flex | | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | In | Out | In | Out | In | Out | In | Out | In | Out | |
| AM Peak Hour (Adjacent Street) | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| PM Peak Hour (Adjacent Street) | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 45 | 18 | 63 |
| AM Peak Hour (Generator) | 0 | 0 | 0 | 1 | 73 | 0 | 0 | 108 | 0 | 0 | 182 |
| PM Peak Hour (Generator) | 0 | 0 | 1 | 1 | 0 | 80 | 81 | 0 | 0 | 0 | 163 |
| Daily | 129 | 129 | 14 | 14 | 127 | 127 | 142 | 142 | 45 | 45 | 914 |
| Source: NV5 2021b. | | | | | | | | | | | |

Although the proposed Project would be replacing a church, that facility's specific hourly traffic generation characteristics cannot be confirmed at this time due to COVID-19 quarantines and stay at home orders. Thus, no attempt to credit any of the church's trips were made for the level of service analyses, which is more conservative.

## Trip Distribution and Assignment

Trips associated with the site have distinct purposes: trucks delivering parcels from sort centers, employee and drivers' home-based work trips, and vans and flex drivers delivering parcels to consumers. All trucks would arrive from and depart to the east. Trip distribution for employees and drivers is assumed to be similar to other workers in the site's census tract. The site's proposed user has a network of delivery stations and expects that this site would serve the generalized area identified in Figure 10 of Appendix G. Coincidentally, the general distribution of deliveries is the same as workers employed in the area during the 2010 census.

All line-haul trucks would approach the site from the east on I-10 using Exit 36 and Azusa Avenue to access San Bernardino Road (See Figure 11) and the site's westernmost driveway.

Trips are assigned to driveways based on vehicle type and trip purpose. Trip assignments approaching/departing the site are based on known routes (trucks) or the shortest, most reasonable routes to generalized origins/destinations (delivery vehicles, drivers, and employees). Trucks are assigned as shown in Figure 12 of Appendix G. Employees (Associates) are all assigned to the westernmost driveway on San Bernardino Road as shown in Figure 13 of Appendix G. Delivery drivers would use driveways 3 and 4 on Badillo Street to access the site when arriving and departing in their personal vehicles (see Figure 14 of Appendix G). Delivery vehicles (vans and flex) would exit the facility via driveway 6 onto San Bernardino Road. They would enter the facility via driveway 5 on San Bernardino Road or any of the four driveways on Badillo Street, as shown in Figure 15 of Appendix G. Delivery routes would avoid Lark Ellen Avenue when possible. While deliveries would be made along Lark Ellen Avenue, northeastern and southeastern routes are assumed to use Azusa Avenue for the TIS.

## Traffic Volumes

The resulting site traffic is illustrated by vehicle type or purpose for the typical AM peak hour on Figure 16 of Appendix H, the typical PM peak hour on Figure 17 of Appendix G, the delivery station's AM peak hour on Figure 18 of Appendix G, and the delivery station's PM peak hour on

Figure 19 of Appendix G. The total Build (2021) traffic is illustrated on Figures 20 and 21 of Appendix G for the typical and site peak hours, respectively.

Traffic entering and exiting the westernmost driveway on San Bernardino Road is of particular interest. During normal operations no more than one truck is expected to enter the site during any hour. The same is true for exiting trucks. All employee (associate) traffic uses this driveway with 40 percent of that traffic turning left into and 60 percent turning left out of the driveway. Table 4-27 lists the left turn volumes at this driveway during those hours when employees are entering and exiting the site.

**TABLE 4-27**
**LEFT TURNING SITE TRAFFIC AT DRIVEWAY 7**

| Hour Beginning | **Inbound Lefts** | **Outbound Lefts** |
|---|---|---|
| 1:00 AM | 29 | 0 |
| 5:00 AM | 9 | 0 |
| 11:00 AM | 2 | 0 |
| Noon | 0 | 42 |
| 1:00 PM | 14 | 0 |
| 2:00 PM | 0 | 11 |
| 6:00 PM | 0 | 10 |
| 10:00 PM | 0 | 14 |
| Source: NV5 2021b. | | |

## Cumulative Development Projects

The City of West Covina as well as the Cities of Covina and Baldwin Park provided lists of land development projects that had previously received approval but were not yet fully occupied as well as development projects that were expected to be approved while this Project was under consideration. Those lists are included in Appendix G. The locations of those developments are identified on Figure 22 of Appendix G by Map ID and summarized in Table 4-28. Most of these developments are unlikely to notably increase traffic at the study intersections. Those that can be reasonably assumed to add traffic to the study intersections are circled on Figure 22 of Appendix G and highlighted in bold text in Table 30. Traffic from two of these developments was taken directly from traffic impact studies produced during their approval processes. Traffic from the proposed residential units at 529 Cutter Way was added as 2021 existing (or background) traffic. Traffic from the redevelopment of the Covina Bowl site at 1060 West San Bernardino Road is included as cumulative development. Trip generation and distribution/assignment assumptions for the other land development projects assumed to contribute traffic to study intersections is also documented in Appendix G. Cumulative Traffic is illustrated in Figure 23 of Appendix G and Cumulative Build Traffic in Figure 24 of Appendix G.

## TABLE 4-28
## CUMULATIVE DEVELOPMENT PROJECTS

| Address | Development Type |
|---|---|
| 1912 West Merced Avenue | Assisted Living Facility |
| **1611/1623 San Bernardino Road** | **Industrial Condominiums** |
| 1530 West Cameron Avenue | Residential Townhomes |
| **2505/2539 East Garvey Avenue N** | **Shopping Center** |
| 1650 East Rowland Avenue | Multi-Family Residential |
| 1115 South Sunset Avenue | Medical Office Building and ICU/Emergency Dept Hospital Addition |
| Walnut Creek Parkway. APN 8474-009-009 | Multi-Family Residential |
| 1024 West Workman Avenue | Multi-Family Residential |
| 147 North Barranca Street | Fast-Food Restaurant with Drive-Thru |
| 1600/1616 West Cameron Avenue | Multi-family Residential |
| San Bernardino Road at Citrus Avenue | Multi-family Residential and Mixed Use |
| 777 Enda Place | Industrial |
| 401 North Citrus Avenue | Office/Retail |
| 129–137 West Orange Street | 8 Condo Units |
| 155 East San Bernardino Road | 10 Condo Units and Small Retail |
| North Citrus and West San Bernardino Road | Multifamily Residential and Commercial |
| 1162 North Citrus | Townhouse Units, Transit Center, Park Ride Facility, Retail, Event Center, and Office |
| 1650 East Old Badillo | Skilled Nursing and Memory-Care Facility |
| 276 West Dexter | 3 Condo Units |
| East Holt and South Park View | Assisted Living/Memory Care Facility |
| 1154/1164 South Park View Drive | Medical Office Building |
| **1680 West San Bernardino Road** | **Rebuild Gas Station, New Convenience Store Plus 2 Auto Service Bays** |
| **1060 West San Bernardino Road** | **Townhomes, Office** (Covina Bowl Redevelopment) |
| **578 North Azusa Avenue** | **Small Low-Rise Hotel** |
| 135 East Badillo | Mixed-Use Development |
| **1201 West Badillo Street** | **Low Rise 28-Unit Apartment Building** |
| ***529 Cutter Way*** | ***50 Multifamily Units (11 Are Livework)*** |
| 731 North Grand Avenue | Gas Station, Convenience Store, and Carwash |
| 342 South Fourth Avenue | Townhouses |
| 3234 Frazier Street | Condominiums |
| 12756 – 12770 Torch Street | Condominiums |
| **APN 8437-013-905** | **Condominiums** |
| 1606 Puente Avenue | Drive Through Car Wash and Convenience Store |
| **15000 Badillo Street** | **Condominiums** |
| 3913 Stewart Avenue | Condominiums |
| 4923–4929 Fortin Street, 15138 Nubia Street & APN 8413-013-025 | Single Family Residential Subdivision |
| **15110–15120 Badillo Street** | **Condominiums** |
| 14837–14839 Pacific Avenue | Single Family Residential |
| 13853 Garvey Avenue | Gas Station and Convenient Store |
| 13018 Dalewood Street | Single Family House |
| 3100 Baldwin Park Boulevard | Drive Thru Restaurant |

**TABLE 4-28**
**CUMULATIVE DEVELOPMENT PROJECTS**

| Address | Development Type |
|---|---|
| 4232 La Rica Avenue | Condominiums |
| APN 8556-022-037, -038 & -039 | commercial warehouse |
| 13619 Francisquito Avenue | Express Carwash |
| 5060 Gayurst Avenue | Small Warehouse |
| 13057–13065 Garvey Avenue | Commercial Industrial Warehouse |
| 13127 Garvey Avenue | Jack in The Box and Starbucks |
| 14614–14622 Dalewood Street | Office, Retail, and Medical Office Building |
| Source: NV5 2021b. | |

## Traffic Signal Warrant Analysis

The Cutter Way/Driveway 7 and Driveway 6 intersections with San Bernardino Road were evaluated to determine if traffic signals would be warranted with the addition of site traffic. The Cutter Way/Driveway 7 intersection was evaluated using traffic for both the peak hours of the adjacent street and the peak hours of the generator. No signal warrant volume thresholds were met during any of these four hours. Site traffic does not exit Driveway 6 during the typical AM peak hour or during the PM peak hour of the site, so only the AM peak hour of the site and the PM peak hour of the adjacent street were evaluated. Again, no signal warrant volume thresholds were met during either of these hours. Driveway 5 has been assumed to operate with only right turns and is expected to see minimal use. It is also unlikely to meet any signal warrant volume thresholds. The signal warrant analysis is documented in Appendix G.

Nevertheless, pursuant to MM TRA-1, a traffic signal with pedestrian phases would be installed at the intersection of San Bernardino Road, Cutter Way, and Driveway 7 as part of the proposed Project to provide safer pedestrian connections along and across San Bernardino Road. This would reduce the spacing of signalized crossings along San Bernardino Road from a half to a quarter mile.

## Traffic Analysis Results

The signalized intersection analyses are provided in Appendix G and the result are summarized in Tables 4-29, 4-30, 4-31, and 4-32. All signalized intersections, with the exception of Badillo Street at Azusa Avenue are expected to operate at LOS D or better under all conditions in 2021. Badillo Street at Azusa Avenue is the only intersection expected to operate at a worse level (LOS E). It is expected to operate at LOS E during the AM peak hour of the adjacent street under all conditions and in the PM peak hour of the adjacent street under the Cumulative No Build and Cumulative Build conditions with only a 0.001 increase in the V/C ratio during the AM Peak, well below the significance threshold of 0.02.

The unsignalized intersection analyses are provided in Appendix G and the results are summarized in Table 4-33. Since no traffic generated by the recent church activities is included as existing traffic, there are no level-of service results for site driveways other than at Cutter Way for the No Build condition. There are also no results for the other driveways during some or all the peak hours due either to the absence of site traffic during that time period or the presence of only inbound traffic for which the analysis methodology assumes that traffic does not experience delays by default (right turns from the major street). Nevertheless, no traffic movements that are required to yield the right-of-way at site's driveways are expected to experience delays beyond

the LOS D range. Left turns from the driveways on Badillo Street would operate at LOS B or better during the hour when vans drivers are leaving the site at the end of their shifts, indicating more than sufficient gaps are available for those movements. No other traffic should be exiting the site via those driveways. Traffic entering those driveways via left turns would also operate at LOS A when traffic is arriving.

## TABLE 4-29
## SIGNALIZED INTERSECTIONS CAPACITY ANALYSIS

| Intersection | No Build | | | | | | | | Build | | | | | | | | Cumulative Build | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Adjacent Street Peak | | | | Generator Peak | | | | Adjacent Street Peak | | | | Generator Peak | | | | Adjacent Street Peak | | | |
| | AM | | PM | | AM | | PM | | AM | | PM | | AM | | PM | | AM | | PM | |
| | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS |
| San Bernardino Road at Vincent Ave | 0.725 | C | 0.696 | B | 0.433 | A | 0.289 | A | 0.725 | C | 0.700 | C | 0.442 | A | 0.294 | A | 0.756 | C | 0.745 | C |
| San Bernardino Road at Cutter Way | | | | | | | | | 0.373 | A | 0.402 | A | 0.281 | A | 0.184 | A | 0.388 | A | 0.424 | A |
| San Bernardino Road at Lark Ellen Avenue | 0.616 | B | 0.686 | B | 0.440 | A | 0.296 | A | 0.617 | B | 0.688 | B | 0.453 | A | 0.301 | A | 0.635 | B | 0.719 | C |
| San Bernardino Road at Rimsdale Avenue | 0.556 | A | 0.650 | B | 0.497 | A | 0.250 | A | 0.556 | A | 0.652 | B | 0.498 | A | 0.250 | A | 0.583 | A | 0.686 | B |
| San Bernardino Road at Azusa Avenue | 0.850 | D | 0.832 | D | 0.627 | B | 0.397 | A | 0.851 | D | 0.836 | D | 0.636 | B | 0.408 | A | 0.868 | D | 0.869 | D |
| Badillo Street at Vincent Avenue | 0.703 | C | 0.745 | C | 0.401 | A | 0.284 | A | 0.703 | C | 0.750 | C | 0.419 | A | 0.298 | A | 0.721 | C | 0.768 | C |
| Badillo Street at Lark Ellen Avenue | 0.671 | B | 0.753 | C | 0.407 | A | 0.273 | A | 0.671 | B | 0.753 | C | 0.415 | A | 0.293 | A | 0.680 | B | 0.762 | C |
| Badillo Street at Rimsdale Avenue | 0.526 | A | 0.530 | A | 0.367 | A | 0.243 | A | 0.526 | A | 0.530 | A | 0.370 | A | 0.253 | A | 0.542 | A | 0.542 | A |
| Badillo Street at Azusa Avenue | 0.911 | E | 0.887 | D | 0.614 | B | 0.415 | A | 0.912 | E | 0.890 | D | 0.614 | B | 0.418 | A | 0.930 | E | 0.910 | E |

V/C: volume/capacity; LOS: Level of Service; AM: before noon; PM: after noon

Source: NV5 2021b.

## TABLE 4-30
## SIGNALIZED INTERSECTIONS CAPACITY ANALYSIS (ADJACENT STREET PEAK)

| | No Build | | | | Build | | | | LOS Increase | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM | | PM | | AM | | PM | | | | |
| | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | AM | PM | Significant |
| San Bernardino Rd @ Vincent Ave | 0.725 | C | 0.696 | B | 0.725 | C | 0.700 | C | 0.000 | 0.004 | No |
| San Bernardino Rd @ Lark Ellen Ave | 0.616 | B | 0.686 | B | 0.617 | B | 0.688 | B | 0.001 | 0.002 | No |
| San Bernardino Rd @ Rimsdale Ave | 0.556 | A | 0.650 | B | 0.556 | A | 0.652 | B | 0.000 | 0.002 | No |
| San Bernardino Rd @ Azusa Ave | 0.850 | D | 0.832 | D | 0.851 | D | 0.836 | D | 0.001 | 0.004 | No |
| Badillo St @ Vincent Ave | 0.703 | C | 0.745 | C | 0.703 | C | 0.750 | C | 0.000 | 0.005 | No |
| Badillo St @ Lark Ellen Ave | 0.671 | B | 0.753 | C | 0.671 | B | 0.753 | C | 0.000 | 0.000 | No |
| Badillo St @ Rimsdale Ave | 0.526 | A | 0.530 | A | 0.526 | A | 0.530 | A | 0.000 | 0.000 | No |
| Badillo St @ Azusa Ave | 0.911 | E | 0.887 | D | 0.912 | E | 0.890 | D | 0.001 | 0.003 | No |
| No Build is without the subject Delivery Station, Build includes the Delivery Station<br>Source: NV5 2021b. | | | | | | | | | | | |

## TABLE 4-31
## SIGNALIZED INTERSECTIONS CAPACITY ANALYSIS (GENERATOR PEAK)

| | No Build | | | | Build | | | | LOS Increase | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM | | PM | | AM | | PM | | | | |
| | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | AM | PM | Significant |
| San Bernardino Rd @ Vincent Ave | 0.433 | A | 0.289 | A | 0.442 | A | 0.294 | A | 0.009 | 0.005 | No |
| San Bernardino Rd @ Lark Ellen Ave | 0.440 | A | 0.296 | A | 0.453 | A | 0.301 | A | 0.013 | 0.005 | No |
| San Bernardino Rd @ Rimsdale Ave | 0.497 | A | 0.250 | A | 0.498 | A | 0.250 | A | 0.001 | 0.000 | No |
| San Bernardino Rd @ Azusa Ave | 0.627 | B | 0.397 | A | 0.636 | B | 0.408 | A | 0.009 | 0.011 | No |
| Badillo St @ Vincent Ave | 0.401 | A | 0.284 | A | 0.419 | A | 0.298 | A | 0.018 | 0.014 | No |
| Badillo St @ Lark Ellen Ave | 0.407 | A | 0.273 | A | 0.415 | A | 0.293 | A | 0.008 | 0.020 | No |
| Badillo St @ Rimsdale Ave | 0.367 | A | 0.243 | A | 0.37 | A | 0.253 | A | 0.003 | 0.010 | No |
| Badillo St @ Azusa Ave | 0.614 | B | 0.415 | A | 0.614 | B | 0.418 | A | 0.000 | 0.003 | No |
| No Build is without the subject Delivery Station, Build includes the Delivery Station<br>Source: NV5 2021b. | | | | | | | | | | | |

## TABLE 4-32
## SIGNALIZED INTERSECTIONS CAPACITY ANALYSIS
## (CUMULATIVE CONDITION)

| | No Build | | | | Build | | | | LOS Increase | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM | | PM | | AM | | PM | | | | |
| | V/C | LOS | V/C | LOS | V/C | LOS | V/C | LOS | AM | PM | Significant |
| San Bernardino Rd @ Vincent Ave | 0.756 | C | 0.750 | C | 0.756 | C | 0.754 | C | 0.000 | 0.004 | No |
| San Bernardino Rd @ Lark Ellen Ave | 0.635 | B | 0.717 | C | 0.635 | B | 0.719 | C | 0.000 | 0.002 | No |
| San Bernardino Rd @ Rimsdale Ave | 0.583 | A | 0.684 | B | 0.583 | A | 0.686 | B | 0.000 | 0.002 | No |
| San Bernardino Rd @ Azusa Ave | 0.868 | D | 0.861 | D | 0.868 | D | 0.869 | D | 0.000 | 0.008 | No |
| Badillo St @ Vincent Ave | 0.721 | C | 0.762 | C | 0.721 | C | 0.768 | C | 0.000 | 0.006 | No |
| Badillo St @ Lark Ellen Ave | 0.680 | B | 0.762 | C | 0.68 | B | 0.762 | C | 0.000 | 0.000 | No |
| Badillo St @ Rimsdale Ave | 0.542 | A | 0.542 | A | 0.542 | A | 0.542 | A | 0.000 | 0.000 | No |
| Badillo St @ Azusa Ave | 0.929 | E | 0.910 | E | 0.93 | E | 0.91 | E | 0.001 | 0.000 | No |

No Build includes the Cumulative projects in Table 4, but not the proposed Delivery Station
Build includes both the Cumulative projects in Table 4 and the proposed Delivery Station
Source: NV5 2021b.

## TABLE 4-33
## UNSIGNALIZED INTERSECTIONS CAPACITY ANALYSIS

| Intersection | | No Build | | | | | | | | Build | | | | | | | | Cumulative Build | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Adjacent Street Peak | | | | Generator Peak | | | | Adjacent Street Peak | | | | Generator Peak | | | | Adjacent Street Peak | | | |
| | | AM | | PM | | AM | | PM | | AM | | PM | | AM | | PM | | AM | | PM | |
| | | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS | Delay[a] | LOS |
| San Bernardino Road at Cutter Way | EBL | 9.3 | A | 8.6 | A | 8.3 | A | 7.7 | A | – | – | – | – | – | – | – | – | – | – | – | – |
| | WBL | – | – | 14.3 | B | – | – | 8.5 | A | – | – | – | – | – | – | – | – | – | – | – | – |
| | NB | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – |
| | SB | 29.7 | D | 22.2 | C | 13.7 | B | 10.7 | B | – | – | – | – | – | – | – | – | – | – | – | – |
| San Bernardino Road at Driveway 6[b] | NB | – | – | – | – | – | – | – | – | – | – | 20.7 | C | 14.4 | B | – | – | – | – | 23.2 | C |
| San Bernardino Road at Driveway 5[c] | NBR | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – |
| Bandillo Street at Driveway 1 or 2[c,d] | SBR | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – |
| Bandillo Street at Driveway 3[c,e] | EBL | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – |
| | SB | – | – | – | – | – | – | – | – | – | – | – | – | – | – | 11.4 | B | – | – | – | – |
| Bandillo Street at Driveway 4[f] | EBL | – | – | – | – | – | – | – | – | – | – | 9.0 | A | 8.4 | A | 7.8 | A | – | – | 9.0 | A |
| | SB | – | – | – | – | – | – | – | – | – | – | – | – | – | – | 9.2 | A | – | – | – | – |

[a] In seconds/vehicle
[b] No traffic exits during the AM Peak of the Street Traffic or the PM Peak of Generator
[c] Traffic enters or exits during the AM Peak of the Street Traffic or AM Peak Generator
[d] PM traffic enters by turning right
[e] No traffic enters or exits during the PM Peak of the Street Traffic
[f] No traffic enters or exits during the AM Peak of the Street Traffic

AM: before noon; PM: after noon; LOS: Level of Service; EBL: eastbound lane; WBL: westbound lane, NB: northbound; SB: southbound; NBR: northbound ramp; SBR: southbound ramp

Source: NV5 2021b.

**PEAK SEASON OPERATIONS**

The actual number of packages delivered from the station varies some throughout the year and by day of week. The trip generation characteristics used in the TIS are considered typical. The delivery station is expected to experience a seasonal increase in package deliveries between Thanksgiving and the end of the year, coinciding with the typical peak shopping season. While processing and delivering the increased number of packages requires more employees, delivery vehicles and drivers, those employees and delivery routes would still operate in shifts designed to minimize commuting peak hours as much as possible. For example, a second employee shift of possibly 100 – 125 associates may be utilized to handle the overflow of packages, beginning their sorting shift in the evening and finishing in the early morning. An additional dispatch shift may also be added with perhaps 100 to 125 vans departing in the morning and returning in the evening but staggered a bit from the typical delivery route shifts. Depending on the need, additional package handling and delivery vehicles would be brought in to supplement the normal delivery process. Some increase in peak hour site traffic can be expected during both the typical peak hours and the site's peak hours. However, most of the increased traffic would be spread throughout the day. For instance, vans would be loaded at rates similar to typical operations, but due to the increase in the number of packages, that process would require more time and instead of all vans departing the site over a two-hour period they would depart over a four-hour period. The same is true for vans returning to the site, although delivery routes may take longer to complete, and their return may span even more hours. All delivery vehicles would still be expected to return to the station before 10:00 PM. There could be up to as twice the typical number of line-haul trucks during this season. Yet, the increase in line-haul truck traffic would be expected to occur after 6:00 PM but before 10:00 PM.

Given the results of the level-of-service and queuing analyses, the additional traffic is not expected to exceed the storage distances provided by left-turn lanes into the site or to spill out onto the adjacent roadways.

Most study intersections, including site driveways, are expected to operate at LOS D or better under all conditions in 2021. The only exception is the intersection of Badillo Street at Azusa Avenue. It is expected to operate at LOS E during the AM peak hour of the adjacent street under all conditions and in the PM peak hour of the adjacent street under the Cumulative Build condition.

The Build conditions do not increase volume/capacity ratios or delays enough to change the LOS at any intersections. The only exception is the intersection of Badillo Street at Azusa Avenue. It is expected to operate at LOS E during the AM peak hour of the adjacent street under all conditions and in the PM peak hour of the adjacent street under the Cumulative No Build condition and Cumulative Build conditions with only a 0.001 increase in the V/C ratios during the AM peak, well below the significance threshold of 0.02.

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

**Less Than Significant Impact.** State CEQA Guidelines Section 15064.3, subdivision (b) provides the criteria for analyzing transportation impacts, and states that a project's effect on automobile delay shall not constitute a significant environmental impact. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. According to the State of California's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, "certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor would have a less than significant impact on VMT" (OPR 2018). The City of West

Covina recently adopted the use of VMT analysis methodology for evaluating potential traffic impacts for development projects.

**VEHICLE MILES TRAVELED (VMT) ANALYSIS**

The proposed Project in West Covina would repurpose an existing 177,440-sf building recently occupied by Faith Church. Typical weekday trip volumes for the church are unavailable due to COVID-19 precautions and closures, so it is not possible to compare the difference between the existing and anticipated traffic volumes for the site.

**SGVCOG VMT Evaluation**

The City of West Covina is included in the SGVCOG travel demand model and is included in SGVCOG's Vehicle Miles Traveled Evaluation Tool. The City has adopted a 15 percent below baseline VMT per Service Population for all land uses. That baseline is 35.02 and the threshold is 29.77. The evaluation tool indicates the site would have a VMT/Service Population of 31.82 without the Project. (See Appendix G.)

The proposed tenant offers all employees the option of setting aside up to $270/month of their before tax pay to be used to subsidize alternative transportation expenses. The tenant also offers preferential parking for car/vanpools close to the building entrance with the number of available spaces varying by demand. In addition, as normal practice the tenant provides kiosks/bulletin boards where transit and ridesharing options are posted, provides a ride-matching platform such as Waze, and assigns an employee transportation coordinator to encourage the use of alternative transportation options. Application of these measures qualify as TP11 Alternative Transportation Benefits and are expected to reduce the VMT per service population to 29.72, below the significance threshold.

Pre-tax benefits are offered through Edenred Commuter Benefits Solutions. Information about these benefits is provided to new employees during their orientation and is documented in the employee handbook. These benefits are applicable to:

- Transit expenses
- Parking expenses for Park & Ride lots/transit stations
- Vanpool and qualified ridesharing (such as Uberpool & Lyft Shared) expenses

With at least 15 percent of the tenant's employees being eligible for Alternative Transportation Benefits , the proposed Project would have a less than significant VMT impact.

**Other Regional VMT Reductions**

It is noteworthy that tenant's delivery stations are located within the company's larger delivery area to consolidate deliveries in smaller geographic areas. The tenant delivers packages to zones much like the U.S. Postal Service except that the routes the vans take vary by day and are optimized for the most efficient movement. It is possible to estimate the VMT for delivery vehicles by finding the distance from the site to the furthest point within the delivery zone and multiplying by the number of vehicles bound for those zones. The furthest point within the zone is assume to account for circuitous travel as packages are dropped off throughout a route. (Note, not every van will travel to the furthest point within a zone).

All customers of the proposed delivery station are already being served by other delivery stations (Table 4-34). The existing VMT for deliveries servicing existing customers is 2,686 miles per day. Most of these delivery trips are within 2 to 7 miles of the proposed delivery station. The future total 2-way VMT for delivery vans is 2,056 miles per day. The existing private carrier VMT is 426 miles per day. The future total VMT for the private carrier operations is 326 miles per day. There would be 730 fewer regional delivery VMT per day.

**TABLE 4-34**
**DELIVERY VEHICLE MILES TRAVELED**

| Trip Type | Daily Trips | VMT from Current Delivery Stations | VMT from Proposed Delivery Station | Difference |
|---|---|---|---|---|
| Delivery Vans | 284 | 2,686 | 2,056 | -630 |
| Private Carrier | 45 | 426 | 326 | -100 |
| Total | 329 | 3,112 | 2,382 | -730 |

VMT: Vehicle Miles Traveled
Source: NV5 2021b.

Analysis results indicate that the existing transportation network can adequately accommodate increases in traffic associated with the proposed Project.

***c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?***

**Less Than Significant With Mitigation Incorporated.** Construction of the Project would require the transport of construction equipment and building materials to and from the site, as well as the hauling of demolition and construction debris from the site. Large trucks used for these activities would have to use designated truck routes in the City, in compliance with Chapter 22, Division 5, Truck Routes, of the Municipal Code (RR TRA-1). Roadway hazards from these trucks and equipment would be less than significant and no mitigation is required.

**Queuing Analysis**

Queuing estimates for stop controlled and yielding movements at unsignalized intersections are included in the HCM analyses. The results for each of the hours analyzed under the build conditions are summarized in Table 4-35. At no time would storage be required for more than one stopped vehicle waiting to enter or exit any of the site's driveways. Queue results from HCM signalized analyses also confirms that queues on San Bernardino Road and Cutter Way would not exceed one vehicle in any turn lane (or exiting Cutter Way or Driveway 7) with the relocation and signalization of Driveway 7 and the addition of site traffic.

**TABLE 4-35**
**QUEUING ANALYSIS**

| Intersection and Lanes | | Street Peak Hours (vehicles) | | Generator Peak Hours (vehicles) | | Queue (Feet[a]) |
|---|---|---|---|---|---|---|
| | | AM | PM | 10:00 AM | 8:00 PM | |
| San Bernardino Road at Cutter Way | EBL | <1.0 | <1.0 | <1.0 | <1.0 | 25 |
| | WBL | <1.0 | <1.0 | <1.0 | <1.0 | 25[b] |
| | NB | <1.0 | - | - | <1.0 | 25 |
| | SB | <1.0 | <1.0 | <1.0 | <1.0 | 25 |
| Badillo Street at Driveway 1 or 2 | SB | - | - | - | - | - |
| Badillo Street at Driveway 3 | EBL | - | - | - | - | - |
| | SB | - | - | - | 0.2 | 25 |
| Badillo Street at Driveway 4 | EBL | - | 0.1 | 0.1 | 0.1 | 25 |
| | SB | - | - | - | 0.2 | 25 |
| San Bernardino Road at Driveway 5 | NBR | - | - | - | - | - |
| San Bernardino Road at Driveway 6 | NB | - | 0.2 | 0.9 | - | 25 |

[a] An average of 25 feet per vehicle is assumed, rounded up to the next whole 25-foot increment.
[b] A minimum of 100 feet will be provided.

AM: before noon; PM: after noon; EBL: eastbound lane; WBL: westbound lane, NB: northbound; SB: southbound; NBR: northbound ramp

Source: NV5 2021b.

## SITE ACCESS, PARKING, AND CIRCULATION

Site access would be provided through one signalized and six unsignalized intersections, with two of the existing driveways to San Bernardino Road relocated slightly to better serve the site and provide safe access to and from that street. No changes are proposed for the other driveways. Pursuant to MM TRA-2, MM TRA-3, and MM TRA-6, providing adequate sight distances (see Figure 25 of Appendix G) would require the elimination of some on-street parking along the site's frontages, maintenance of median landscaping and new landscaping limited to no more than 3.5 feet tall within sight lines behind the sidewalk along Badillo Street. None of the site driveways require signalization to operate at acceptable levels of service even during peak hours, though Driveway 7 would be signalized to improve pedestrian access. Existing and proposed left-turn lanes into the site are more than sufficient to store vehicles waiting on gaps in traffic during peak periods. There are total of seven driveways. Three site driveways (i.e., one on San Bernardino and two on Badillo) would provide full access. Entering and exiting movements at these driveways can be accommodated by existing lanes, yet a westbound left-turn lane into Driveway 7 (see Appendix G for striping plan and MM TRA-4, MM TRA-5, and TRA-7) would be provided as part of the Project. Other than aligning Driveway 7 with Cutter Way, the current spacing between driveways and major side streets would be maintained. None of the driveways provide access to other sites.

The sidewalk along San Bernardino Road would be replaced and a connection between this sidewalk and the front door provided. Crosswalks and pedestrian phases would be included in the design of the new traffic signal at the Cutter Way intersection on San Bernardino Road.

Parking for up to 811 passenger cars and vans would be available on-site (Table 4-36). Overnight fleet vehicle and drivers' personal vehicle parking, totaling 626 spaces, is available south and east of the building, accessible from Driveways 1 through 5. All delivery vehicles would exit via driveway 6. Employees (Associates) would enter and exit opposite Cutter Way and have access

to 185 passenger car spaces to the west of the building. Line-haul trucks would also enter and exit opposite Cutter Way to access 8 loading docks along the west side of the building.

**TABLE 4-36**
**PARKING REQUIREMENTS & PROVISIONS**

| Required Parking Spaces | | Provided Parking Spaces | |
|---|---|---|---|
| **Type** | **Number** | **Type** | **Number** |
| Office: 9,478 square feet and 1 Space of 300 square feet | 32 | 9' x 18' (Associates) | 185 |
| Industrial: 159,840 square feet and 1 Space of 500 SF | 320 | 11' x 27' (Van Fleet) | 626 |
| **Total** | **352** | **Total** | **811** |
| 8 Accessible (State Accessibility Code) | | 8 Accessible of which 1 is van sized | |
| Source: NV5 2021b. | | | |

## ACTIVE TRANSPORTATION AND PUBLIC TRANSIT ANALYSIS

The proposed Project is consistent with adopted policies, plans, and programs to provide infrastructure for active transportation and public transit facilities. It would not conflict with existing or proposed facilities supporting these travel modes. Specifically, the West Covina Active Transportation Plan proposes the addition of bike lanes along Badillo Street. Conversion of the site to the proposed delivery station does not require any changes to Badillo Street that would prevent the installation of these bike lanes. The delivery station does not require any on-street parking along its frontage, freeing up pavement adjacent to the north curb for striping as a bike lane. In addition, while the Plan does not call for any pedestrian improvements along either Badillo Street or San Bernardino Road, the sidewalk along the site's frontage on San Bernardino Road would be replaced as part of the site's conversion to a delivery station.

The Project would also provide signalized crosswalks across San Bernardino Road reducing the spacing of such crossing from a half to a quarter mile. Foothills Transit Route 190 provides fixed-route bus service with stops on San Bernardino Road at Vincent Avenue and Lark Ellen Avenue.

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

**Less Than Significant Impact.** During demolition and construction, construction equipment would be staged on the Project site and would not block the roadways surrounding the Project site. Construction on and obstruction of public rights-of-way associated with utility connections to existing utility infrastructure would be in accordance with applicable City regulations, including City Standard Plans, Section 19-302, Standard Specifications for Public Works Construction (Greenbook), of the Municipal Code (Greenbook). While lane closures may occur, no full road closures would result during the construction phase of the Project. Accordingly, temporary construction activities would not impede the use of surrounding roadways for emergency evacuation or access for emergency response vehicles. Adjacent streets would also be returned to their original conditions after construction activities. Impacts would be temporary and less than significant, and no mitigation is required.

**Regulatory Requirements**

**RR TRA-1** All trucks used during demolition and construction and during long-term occupancy of the Project shall use designated truck routes, in compliance with Chapter 22, Division 5, Truck Routes, of the West Covina Municipal Code.

**RR TRA-2** The Project shall be designed and constructed to provide adequate sight distance for drivers at all entrances and exits (driveways), drive aisles, and roadways, per West Covina Municipal Code Section 22.8, Obstruction to Visibility at Intersections or Driveways.

**Mitigation Measures**

The following measures need to be shown on future plans submitted to the City for review during the Plan Check Phase:

**MM TRA-1** As determined by the Traffic Study Dated June 22, 2021, a new traffic signal shall be installed at the intersection of Cutter Way and Project Driveway #7. A signal and striping plan shall be submitted and approved by the City of Covina (since San Bernardino road is within City of Covina ROW). The plan shall also be submitted to the cities of West Covina and Covina for concurrence on the Signal Plan as well as the Signing and Striping Plans for San Bernardino Road.

**MM TRA-2** All vegetation located along driveways on Badillo Street needs to provide a clear line of sight for exiting vehicles. All newly installed landscaping shall be lower than 3.5 feet in height on both sides of each driveway.

**MM TRA-3** New red curbs are required to provide clear line of sight for driveways along Badillo Avenue. The Red Curbs are to be shown on all submitted plans to the City for Approval. The amount of red curb (in feet) is to be determined by applicant's engineer based on Line of Sight Calculations.

**MM TRA-4** The signal and striping plan shall accommodate left turn lanes/pockets on both approaches of San Bernardino Road at Cutter Way to eliminate sight distance and safety issues for eastbound left turning vehicles whose views of the westbound vehicles may be blocked by trucks.

**MM TRA-5** A 2-way left turn lane shall be installed along the entire Project east of Cutter Way to facilitate traffic turning out of the driveways on San Bernardino Road. As there are several driveways on both sides of San Bernardino Road, the future 2-way left turn lane shall facilitate all left turns in and out of all of these driveways to improve traffic safety along this corridor.

**MM TRA-6** The amount of new red curb on San Bernardino Road, on either side of proposed driveways in order to provide clear line of sight, shall be shown on all plans submitted to the cities of Covina and West Covina for approval. The amount of red curb (in feet) is to be determined by applicant's engineer based on Line of Sight Calculations as shown in Appendix G in the June 22, 2021 Traffic Impact Study, Figure 25.

**MM TRA-7** Conceptual Striping Plan for the left turn movements into driveways 5 and 6 on San Bernardino Road shall prohibit the left turn movement into the site necessitating the installation of NO LEFT TURN signs at each driveway for westbound traffic. This requires installation of R3-2 and R5-1 signs.

## 4.18 TRIBAL CULTURAL RESOURCES

| Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| 1. 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 | ☐ | ☐ | ☒ | ☐ |
| 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☐ | ☒ | ☐ |

This section reviews the potential to have adverse effects on Tribal Cultural Resources. The City of West Covina conducted consultation with California Native American Tribes, as required by CEQA, per Assembly Bill 52 (AB 52) and Senate Bill (AB 18). The City of West Covina initiated consultation on December 7, 2020 by notifying the City's consultation list of the proposed project located at 1211 E Badillo Street. The outreach included the Gabrielino/Tongva Nation, the Soboba Band of Luiseno Indians and the Gabrieleno Band of Mission Indians-Kizh Nation. The outreach referenced a 30 day timeframe to receive any feedback related to the Project. No responses were received within the 30 days.

**Impact Analysis**

### *Would the Project:*

***a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

***1 . Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?***

**Less than Significant Impact.** As discussed in Section 4.5, Cultural Resources, prior references available from the City of West Covina did not identify any previously recorded prehistoric or historic archaeological sites or historic structures within the Project site. Furthermore, the Project site does not contain any known sacred lands or sites. The proposed Project primarily entails the repurposing of an existing site and associated tenant improvements. No significant grading is proposed and the entire site has been disturbed and in an urbanized condition. No impacts would occur and no mitigation is required.

***2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

**Less Than Significant Impact.** The Project site does not contain any known resources 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. It is further noted that any discovery of human remains, as noted in Section 4.5, Cultural Resources, of this Initial Study, would be subject to Section 5097.98 of the California Public Resources Code. With implementation of Regulatory Requirements set forth, impacts are concluded as less than significant and no mitigation is required.

**Regulatory Requirements**

Refer to RR CUL-1 in Section 4.5 (Cultural Resources) of this Initial Study.

**Mitigation Measures**

Project implementation would no result in significant impacts related to tribal cultural resources; therefore, no mitigation is required.

## 4.19 UTILITIES AND SERVICE SYSTEMS

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

### Impact Analysis

***Would the Project:***

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

**No Impact.**

***Water***

Azusa Light & Water (ALW) would provide water service to the Project. ALW operates and maintains the electric and water utilities for the City of Azusa and portions of the Cities of West Covina and Covina. (ALW 2021). The Project would be in compliance with Chapter 23, Article III, Water of the West Covina Municipal Code, which sets regulations for service connections, water rates, and other water system provisions (see RR UTL 1). Prior to the issuance of the building permit, the Applicant would be required to verify that the City's water system can accommodate the proposed Project's fire flows and potable water demand. The estimated water demand of the Project is not expected to exceed available supplies or the available capacity within the distribution infrastructure that would serve the Project site. No impacts would occur and no mitigation is required.

***Wastewater***

The City of West Covina Public Services Department (Maintenance Division) maintains the City's sewer system. Wastewater from the City's system is treated by the Los Angeles County Sanitation

District (LACSD). West Covina's wastewater is treated and disposed of at the LACSD's San Jose Creek Water Reclamation Plant (SJCWRP) and/or the Whittier Narrows Reclamation Plant (WNRP). Wastewater generation of the Project would not increase the demand on SJCWRP and WNRP. Given the existing capacities at SJCWRP and WNRP and the proposed Project uses, both facilities would be able to serve the Project. Additionally, payment of the LACSD capital facilities capacity charges would provide funds for the incremental increase in demand for wastewater treatment that may occur with the Project (see RR UTL-2). Additionally, the storm water runoff from the Project site would not exceed the capacity of the existing storm drain system. No impacts would occur and no mitigation is required.

***Electricity***

Southern California Edison (SCE) currently provides electricity to the City, including the Project Site (SCE 2021). Electrical service to the Project site would be provided in accordance with SCE's policies and extension rules on file with the California Public Utilities Commission (CPUC). Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to electricity would not occur. Additionally, the Project Applicant would coordinate with SCE to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. No impacts would occur and no mitigation is required.

***Natural Gas***

The Southern California Gas Company (SCGC) currently provides natural gas service to the City, including the Project site (SCGC 2021). The service would be provided in accordance with SCGC's policies and extension rules on file with the CPUC. Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to natural gas would not occur and no mitigation is required.

***Telecommunications***

Verizon provides telecommunications service to the area, including the Project site. The service would be provided in accordance with Verizon's policies and extension rules on file with the CPUC.

The Project Applicant would coordinate with all utility providers to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Based on the analysis above, the Project would not require or result in the relocation or construction of new or expanded water, wastewater infrastructure and treatment facilities, storm water drainage, electricity, natural gas, or telecommunications facilities. Given the prior manufacturing uses and the proposed upgrades, the current utility providers are anticipated to have the capacity for the proposed uses. No impacts would occur and no mitigation is required.

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

**No Impact.** Water service for the Project would be provided by Azusa Light & Water. The Proposed project's net water demand is not anticipated to be significantly different, and upgrades to existing water lines would not be anticipated. Water service to the Project would also be provided in compliance Chapter 23, Article III, Water of the West Covina Municipal Code, which sets regulations for service connections, water rates, and other water system provisions (see RR UTL-1). The Project would comply with Sections 4.303 and 4.304 of the CALGreen Code (as adopted by the City), which require indoor and outdoor water conservation measures such as low

flush toilets, aerators on sinks and showerheads, other water-efficient appliances, and water-efficient automatic irrigation system controllers. With compliance with the City's water conservation measures, the proposed Project would not significantly impact the City's domestic water supply. No impacts would occur, and no mitigation is required.

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

**No Impact.** Wastewater generation of the Project is not expected to increase the demand of SJCWRP and WNRP. The Project would also pay LACSD capital facilities capacity charges to fund wastewater treatment that would be needed by the Project (see RR UTL-2). The Project is not anticipated to exceed the capacities of the wastewater treatment facilities. No impacts would occur, and no mitigation is required.

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

**No Impact**. The City of West Covina contracts with Athens Services to provide trash, recycling, and special pickup services to all industrial facilities within West Covina (City of West Covina 2016a). Waste collected by Athens Services within the City is taken to a Materials Recovery Facility (MRF) in the City of Industry, which accepts trash as well as commingled materials such as glass, plastic, cardboard, etc. that is sorted and separate at the facility. The City of Industry MRF can process 5,000 tons of mixed material each day (City of West Covina 2016a). Based on available capacities at existing facilities, the Project is anticipated to result in less than significant impact, and no mitigation is required.

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

**No Impact.** The City's solid waste disposal activities are required to be in compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). AB 939 requires jurisdictions to meet the statewide goal to divert 25 percent and 50 percent of solid waste generated by year 1995 and 2000. Further, on October 6, 2011, the California Governor signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012, for businesses and public entities generating four cubic yards of trash. Solid waste storage and collection at the Project would comply with Chapter 12, Garbage and Rubbish Collection, of the Municipal Code.

In accordance with Section 4.408 of the CALGreen Code, at least 65 percent of demolition and construction debris would need to be diverted from landfills by recycling, reuse, and/or salvage (see RR UTL-4). Chapter 7, Article XVI, Waste Reduction, Reuse and Recycling of Construction and Demolition Debris, of the City's Municipal Code, outlines the requirements for diverting construction waste into landfills.

The proposed Project would have regular waste collection services; be provided with recycling bins to promote recycling; and would participate in the City's solid waste diversion programs. No conflict with statutes and regulations related to solid waste would occur. No impact would occur, and no mitigation is required.

## Regulatory Requirements

**RR UTL-1** Water service to the Project, including application for water service, service connections, water rates, fire service, and water mains, shall be constructed and provided in accordance with Chapter 23, Article III, Water, of the West Covina Municipal Code.

**RR UTL-2** The Project Applicant shall pay the applicable Connection Fee Program capital facilities fees to the Los Angeles County Sanitation District (LACSD), as authorized by the California Health and Safety Code Sections 5400 to 5474.

**RR UTL-3** The Project shall be designed and constructed with water-efficient fixtures and systems, as required by the CALGreen Code, which has been adopted by reference into Section 7-301, Adoption of Title 31 (Green Building Standards Code), of the West Covina Municipal Code.

**RR UTL-4** The Project contractor shall recycle, reuse, and/or salvage at least 65 percent of demolition and construction debris, in accordance with Section 4.408 of the CALGreen Code.

## Mitigation Measures

Project implementation would not result in significant impacts related to utilities and service systems; therefore, no mitigation measures are required.

## 4.20 WILDFIRE

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

### Impact Analysis

***If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:***

***a) Substantially impair an adopted emergency response plan or emergency evacuation plan?***

**No Impact.** The proposed Project is not within a designated VHFHSZ, as defined by the California Department of Forestry and Fire Prevention (CAL FIRE 2011). The Project site is between two designated disaster routes, North Vincent Avenue, approximately 0.10 miles to the west and Azusa Boulevard, approximately 0.5 miles to the east (LAC Public Works 2008). The nearest designated freeway disaster route is I-10 freeway, located 1.0 mile south of the site. Because Checklist Response thresholds 4.20(a) through 4.20(d) apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

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

**No Impact.** The Project site is in a highly urbanized area of the City, and there are no large, undeveloped areas and/or steep slopes on or near the site that would exacerbate fire risks such that would expose the Project and its occupants to wildfire related hazards. The site and the surrounding areas are not located in designated VHFHSZ. Rather, the site is within a Non-VHFHSZ area (CAL FIRE 2011). Therefore, the Project is not expected to exacerbate wildfire risks and create pollutants associated with wildfire or uncontrolled spread of wildfire. Additionally, because Checklist Response thresholds 4.20(a) through 4.20(d) apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

***c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

**No Impact.** As previously described, the proposed Project is not within a designated VHFHSZ as defined by CalFire (CAL FIRE 2011). All tenant improvements on the Project site would be constructed to meet current City building and fire codes. Implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Additionally, because Checklist Response thresholds 4.20(a) through 4.20(d) apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

***d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

**No Impact.** As previously described, the proposed Project is not within a designated VHFHSZ as defined by CalFire (CAL FIRE 2011). As discussed in Section 4.7, Geology and Soils, the Project is in a highly urbanized area that is in a generally flat topographical area away from downslope or landslide areas. Specifically, implementation of the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Additionally, because Checklist Response thresholds 4.20(a) through 4.20(d) apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

**Regulatory Requirements**

None required.

**Mitigation Measures**

Project implementation would not result in significant impacts related to wildfire; therefore, no mitigation measures are required.

## 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

**Impact Analysis:**

***Would the Project:***

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

**Less Than Significant With Mitigation Incorporated.** There are no sensitive biological resources, habitats, or species on the Project site that would be affected by the Project. As indicated in Section 4.4, Biological Resources, of this IS/MND, given the current developed condition and the existing trees and shrubs on the site, migratory birds may nest on the vegetation on-site. However, MM BIO-1 would avoid impacts to active bird nests during construction of the Project. Impacts on migratory birds would be less than significant after mitigation.

There are no historical resources on the Project site that would be impacted by the proposed Project. Additionally, implementation of MM CUL-1 would prevent or reduce impacts on buried archaeological resources and tribal cultural resources that may be uncovered during grading and excavation activities. Implementation of MM GEO-2 would also mitigate impacts on paleontological resources. With implementation of these mitigation measures, the Project's potential impacts on cultural and tribal cultural resources would be less than significant.

Therefore, the Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of a rare or endangered plant or animal; or eliminate important

examples of the major periods of California history or prehistory. Impacts would be less than significant with mitigation.

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

**Less Than Significant Impact**. As identified in the preceding analyses, all Project-level impacts have been determined to be less than significant with or without compliance with regulatory requirements or mitigated to a level considered less than significant with incorporation of mitigation measures. These impacts would not be cumulatively considerable, since mitigation measures would be implemented to avoid or reduce potential Project-specific impacts associated with these environmental issues.

Development projects would be subject to environmental review by the City, pursuant to CEQA, the State CEQA Guidelines, and the City's Local CEQA Guidelines, to determine if they would lead to cumulative environmental effects as part of the appropriate CEQA analysis for each project. Since the proposed Project would not have significant impacts after mitigation, the impacts of the Project are not expected to result in cumulatively considerable impacts when added to the impacts of other projects planned or proposed in the vicinity of the site. Cumulative impacts would be less than significant, and no mitigation is required.

***c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

**Less Than Significant With Mitigation Incorporated.** Based on the environmental analyses above, with compliance with applicable regulatory requirements and/or the implementation of mitigation measures, the Project would have less than significant impacts on humans, as it relates to the following environmental issue areas: aesthetics, agriculture and forestry resources, air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, tribal resources, utilities and service systems, and wildfire.

The proposed Project's impacts on the following issue areas would require the implementation of mitigation measures: biological resources, cultural resources, geology/soils, and transportation. All impacts would be avoided or reduced to less than significant levels after mitigation.

Therefore, the proposed Project would not result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of mitigation measures. All impacts would be less than significant after mitigation.

# SECTION 5.0 REFERENCES

AdvancedGeo, Inc. (AGI). 2020 (June 24). *Asbestos and Lead-Based Paint Survey Report BADILLO ENTERPRISES PROPERTY*, 1211 East Badillo Street, West Covina, CA 91790. Anaheim. (AGI). Appendix E2.

Azusa Light & Water (ALW). 2021 (February 4, last accessed). *Water Service Area*, Azusa, CA 91702. https://www.ci.azusa.ca.us/729/Communities-We-Serve

Carlberg Associates, *West Covina Industrial Project Tree Inventory Report*. 2020. (November 6). Santa Monica, CA: Carlberg Associates (Carlberg). Appendix B.

California Air Pollution Control Officers Association (CAPCOA). 2016. California Emission Estimator Model (CalEEMod)$_{TM}$ Version 2016.3.2, Developed by Trinity Consultants in Collaboration with SCAQMD and other California Air Districts. Sacramento, CA: CAPCOA.

California Air Resources Board (CARB). 2021 (accessed May 21) Top 4 Summary: Azusa Monitoring Station. Sacramento, CA: CARB. https://www.arb.ca.gov/adam/topfour/topfourdisplay.php.

———. 2021b (accessed March 5). Maps of State and Federal Area Designations. Sacramento, CA: CARB. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

———. 2016 (May 4). Ambient Air Quality Standards. Sacramento, CA: CARB. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf

———. 2014 (February). Proposed First Update to the Climate Change Scoping Plan: Building on the Framework. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/scopingplan/2013_update/draft_proposed_first_update.pdf.

———. 2008 (December). Climate Change Scoping Plan—Pursuant to AB 32. Sacramento, CA: CARB. https://ww3.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.

California Building Standards Commission (CBSC). 2019 California Green Building Standards Code (Accessed June 5, 2020. https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen.

California Department of Conservation (DOC). 2021 (January 22, last accessed). Landslide Inventory (Beta). Sacramento, CA: DOC. https://maps.conservation.ca.gov/cgs/lsi/app/.

———. 2020. (November 24, access date). *Division of Mine Reclamation, Mines Online.* Sacramento, CA: DOC. https://maps.conservation.ca.gov/mol/index.html.

———. 2015 (October 1). *California Geological Survey Information Warehouse, Minerals Land Classification*. Sacramento, CA: DOC. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.

California Department of Forestry and Fire Protection (CAL FIRE). 2011 (September). *Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE, City of West Covina*. Sacramento, CA: CAL FIRE. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/.

California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). 2020 (November 12, last accessed). Los Angeles County Important Farmland 2016. Sacramento, CA: FMMP. https://maps.conservation.ca.gov/DLRP/CIFF/

California Department of Finance (DOF). 2020 (May) E-1 Population Estimates for Cities, Counties, and the State — January 2019 2020. Sacramento, CA: DOF. https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/

California Department of Resources Recycling and Recovery (CalRecycle). 2020 (July 28, access date). SWIS Facility Detail Victorville Sanitary Landfill (36-AA-0045) Sacramento, CA: CalRecycle. https://www2.calrecycle.ca.gov/swfacilities/Directory/36-AA-0045.

California Department of Toxic Substances Control (DTSC). 2021 (January 21, access date). Envirostor - Hazardous Waste and Substances Site List (Cortese). Sacramento, CA: DTSC. https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE).

California Department of Transportation (Caltrans). 2019. California State Scenic Highway System Map. Sacramento, CA: Caltrans. https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983.

California Energy Commission (CEC). 2020a (June 1, last accessed). Clean Energy and Pollution Reduction Act—SB 350. Sacramento, CA: CEC. https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350.

———. 2020b (June 1, last accessed). SB 100 Joint Agency Report. Sacramento, CA: CEC. https://www.energy.ca.gov/sb100.

———. 2018 (March). 2019 Energy Efficiency Building Standards. Sacramento, CA: CEC. https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.

California Office of Legislative Counsel. 2020 (November 23, access date). Public Resources Code. Sacramento, CA: OLC. And http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=12220&lawCode=PRC and http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4526&lawCode=PRC

Employment Development Department (EDD). 2021 (February 2, last accessed). *Cities and Census Designated Places by Individual County Monthly Labor Force Data for Cities and Census Designated Places (CDP), West Covina*. Sacramento, CA: EDD. https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html

Federal Emergency Management Agency (FEMA). 2021 (February 1, last accessed). FEMA Flood Map Service Center: Search By Address. Washington, D.C.: FEMA. https://msc.fema.gov/portal/

Geosyntec Consultants. (Geosyntec). 2020a (May 12). Phase I Environmental Site Assessment, Amazon Site Code DAX9 1211 Badillo Street, City of West Covina, California 91790. Seattle, WA: Geosyntec. Appendix E1.

———. 2020b (June 24). Limited Phase II Environmental Site Assessment Amazon Site Code DAX9 1211 Badillo Street, City of West Covina, California 91790. Seattle, WA: Geosyntec. Appendix E1.

Kleinfelder. 2020 (November 13). *Geotechnical Study Proposed DAX9 Warehouse Improvements*, *1211 Badillo Street, West Covina, California 91790*. Laguna Hills, California 92653: Kleinfelder. Appendix D.

Los Angeles County Airport Land Use Commission (Los Angeles County ALUC). 2015. Brackett Field Airport Land Use Compatibility Plan. Los Angeles, CA: Los Angeles County ALUC. http://planning.lacounty.gov/assets/upl/project/brackett_alucp_final.pdf.

_____. 1991. Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan. Los Angeles: CA: Los Angeles County ALUC. Available at: http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf.

Los Angeles County Library (LA County Library). 2020 (access date, December 29) West Covina Library. Los Angeles, CA: LA County Library. https://lacountylibrary.org/west-covina-library/.

Los Angeles County Public Works (LAC Public Works). 2008. City of West Covina Disaster Map Route. Alhambra, CA: LAC Public Works. https://dpw.lacounty.gov/dsg/DisasterRoutes/city.cfm.

Los Angeles County Sanitation District (LACSD). 2020a. San Jose Creek Water Reclamation Plant. Whittier, CA: LACSD. https://www.lacsd.org/services/wastewater/wwfacilities/wwtreatmentplant/san_jose_cree.asp.

NV5 Engineers and Consultants (NV5). 2021a (June 22) *Noise Impact Analysis _DAX9, West Covina, California Delivery Station*. Long Beach, CA: NV5. Appendix F.

———. 2021b (June 22) *Traffic Impact Study for West Covina Delivery Station*. Roswell, GA: NV5. Appendix G.

Governor's Office of Planning and Research. 2018 (December). Technical Advisory on Evaluation Transportation Impacts in CEQA. Sacramento, CA: OPR. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

South Coast Air Quality Management District (SCAQMD).2021 (April 9, last accessed). Final 2016 AQMP and Related SIP Submittals. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp

South Coast Air Quality Management District (SCAQMD). 2020. (July last accessed). Historical Data by Year—2016-2018. Diamond Bar, CA: SCAQMD. https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year.

———. 2019 (April, Revision). SCAQMD Air Quality Significance Thresholds. Diamond Bar, CA: SCAQMD. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

———. 2010 (September 28). Minutes for the GHG Significance Threshold Stakeholder Working Group #15. Diamond Bar, CA: SCAQMD.

———. 2009. Localized Significance Thresholds. Diamond Bar, CA: SCAQMD. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds

———. 2008 (July, as revised). Final Localized Significance Threshold Methodology. Diamond Bar, CA: South Coast AQMD. http://www.aqmd.gov/ceqa/handbook/LST/Method_final.pdf.

———. 2008b (December 5). PROPOSAL: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Diamond Bar, CA: SCAQMD. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2.

———. 2003b (August 1). 2003 Air Quality Management Plan. Diamond Bar, CA: SCAQMD. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf.

———. 2003 (August). White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Diamond Bar, CA: SCAQMD. https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp.

———. 1993. CEQA Air Quality Handbook. Diamond Bar, CA: SCAQMD.

Southern California Association of Governments (SCAG). 2020 (Adopted September 3). Connect SoCal, The 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy of The Southern California Association Of Governments. Los Angeles, CA. SCAG. https://scag.ca.gov/read-plan-adopted-final-plan

Southern California Association of Governments (SCAG). 2016 (April). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. Los Angeles, CA: SCAG. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

———. 2016b. Final 2016-2040 RTP/SCS Appendix, Demographics and Growth Forecast. Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

Southern California Edison (SCE). 2021 (February 4, last accessed). Incorporated Cities and Counties Served by SCE. Rosemead, CA: Southern California Edison. https://www.sce.com/sites/default/files/inline-files/Incorporated_Cities_and_Counties_and_Unicorporated_Areas_Served_by_SCE.pdf.

Southern California Gas Company (SCGC). 2021 (February 4, last accessed). List of Cities and Communities Served. Los Angeles, CA: SCGC. https://www.socalgas.com/about-us/company-profile#service-area

University of California Davis (UCD), Institute of Traffic Studies (ITS) 1997 (December, as revised). *Transportation Project-Level Carbon Monoxide Protocol* (Prepared for Environmental Program California Department of Transportation by V.J. Garza, P. Graney, and D. Sperling with revisions by D. Niemeier, D. Eisinger, T. Kear, D. Chang, and Y. Meng). Davis, CA: ITS. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/research-aqp-a11y.pdf.

U.S. Environmental Protection Agency (USEPA). 2021 (accessed February 8). NAAQS Table. https://www.epa.gov/criteria-air-pollutants/naaqs-table

———. 2021b (February 28, current as of). *Nonattainment Areas for Criteria Pollutants (Green Book)*. Research Triangle Park, NC: https://www.epa.gov/green-book

———. 1971. Noise from *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances.* https://nepis.epa.gov/Exe/ZyNET.exe/9101NN3I.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+1976&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIn.dex%20Data%5C70thru75%5CTxt%5C00000024%5C9101NN3I.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL.

U.S. Fish and Wildlife Service (USFWS). 2020 (July 9, access date). Critical Habitat for Threatened and Endangered Species. Washington, D.C.: USFWS. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77

West Covina, City of. 2021 (April 14, last accessed). City of West Covina Police Department website: About. West Covina, CA: City of West Covina. https://wcpd.org/index.php/about/

———. 2020a (July 29, last accessed). City of West Covina Water District Map. West Covina, CA: City of West Covina. https://www.westcovina.org/departments/city-manager-s-office/gis-maps.

———. 2020b (December 24, accessed date). Fire Department. West Covina, CA: City of West Covina. https://www.westcovina.org/departments/fire.

———. 2016a. (December). West Covina General Plan (PlanWC). West Covina, CA: City of West Covina. https://www.westcovina.org/departments/community-development/planning-division/general-plan

———. 2016b (December). Final Environmental Impact Report for the 2016 General Plan Update and Downtown Plan and Code. West Covina, CA: City of West Covina. https://www.westcovina.org/departments/community-development/planning-division/general-plan

———. 2011 (September, adopted). City of West Covina Energy Action Plan. West Covina, CA: City of. https://www.ca-ilg.org/sites/main/files/file-attachments/west_covina_energy_action_plan.pdf.

———. 1994 (October 4th). City of West Covina Faith Community Church Specific Plan and Precise Plan. West Covina, CA: City of. https://www.westcovina.org/departments/community-development/planning-division/zoning/specific-plans

West Covina Police Department. (WCPD) 2020 (December 24, access date). Service Areas. West Covina, CA: WCPD. https://www.wcpd.org/services/service-areas/