COVINA RECREATION VILLAGE

Exemption Checklist

Lead Agency:
City of Covina
125 E. College Street
Covina, CA 91723

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

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1 INTRODUCTION

The City of Covina is seeking approval of a site plan to develop a new recreation village with City Parks and Recreation Offices on a site currently developed with two vacant packinghouses. The City of Covina is the Lead Agency for the proposed project. The Lead Agency will utilize this document as evidence that the proposed project qualifies for the Class 32 Infill Exemption, which is further described below.

1.1 PURPOSE OF NOTICE OF EXEMPTION

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects which have been determined not to have a significant effect on the environment. This document demonstrates that the proposed project qualifies for a CEQA Exemption as an Infill Development Project (Class 32 Exemption), consistent with the provisions of CEQA Guidelines Sections 15332 and 15300.2 and provides information for City decision-makers to find that the proposed project is exempt under CEQA.

Pursuant to CEQA Guidelines Section 15332, the project qualifies for a Class 32 Exemption because it is: (1) consistent with the General Plan designation and policies and zoning regulations; (2) is located within the City limits, surrounded by urban uses and is less than 5 acres in size; (3) has no value for endangered, rare or threatened species; (4) would not result in any significant effects related to traffic, noise, air quality or water quality; and (5) can be adequately served by all required utilities and public services. Additionally, this document demonstrates that the project and its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2.

Existing Plans, Programs, or Policies (PPPs) and Project Design Features (PDFs)

Throughout the analysis of this document, reference is made to requirements that are applied to all development on the basis of federal, state, or local law. Existing Plans, Programs, or Policies are collectively identified in this document as PPPs. Where applicable, PPPs are listed to show their effect in reducing potential environmental impacts. The Project incorporates various measures that serve to reduce potentially significant impacts. These measures are referred to as Project Design Features (PDFs) and are listed below. Additionally, applicable Mitigation Measures from the Town Center Specific Plan (TCSP) EIR are included herein and will be incorporated into the Project. As shown throughout the analysis, the Project does not result in any new impacts and no additional mitigation measures are required. All references to mitigation measures relate only to those from the TCSP.

1.2 DOCUMENT ORGANIZATION

This Class 32 Exemption Checklist includes the following sections:

Section 1. Introduction

Provides information about CEQA, its requirements for environmental review, and explains the Exemption Checklist that evaluates the potential impacts of the proposed project to the physical environment.

Section 2. Project Setting

Provides information about the proposed Project's location, the Project site, and background.

Section 3. Project Description
Includes a description of the proposed Project's physical features and construction and operational characteristics.

Section 4. Discretionary Approvals

Describes anticipated approvals and permits needed for implementation of the proposed Project.

Section 5. Class 32 Infill Exemption Requirements

Includes the Exemption Checklist and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment.

2 PROJECT SETTING

2.1 PROJECT LOCATION

The proposed 2.5-acre Covina Recreation Village Project ("Project" or "proposed Project") is located within the central portion of the City of Covina. As depicted on Figure 1, *Regional Location*, the City of Covina is in the San Gabriel Valley region of Los Angeles County, approximately 22 miles east of downtown Los Angeles, 35 miles west of downtown San Bernardino, and 10 miles northeast of Orange County, as shown on Figure 2-1, *Regional Location.*

As depicted on Figure 2-2, *Local Vicinity,* the Project site is located at 707 N. Barranca Avenue, directly east of the Covina Metro Station on N. Citrus Avenue. Regional access is provided via Interstate 10 (I-10) located approximately 1.48 miles to the south, Interstate 210 (I-210), approximately 1.86 miles to the north, and State Route 39 (SR-39), approximately 1.43 miles to the west. Local access is provided by N. Citrus Avenue.

2.2 EXISTING PROJECT SITE

The Project site consists of four parcels totaling 2.5-acres (APN 8430-018-009, 8430-018-017, 8430-018-021, and 8430-018-013). The Project site is developed with two vacant warehouses that formerly functioned as a VitaPakt packing facility, as shown on Figure 2-3, *Aerial,* and Figure 2-4, *Site Photos*. The Project site is located directly adjacent and connected to the Covina Metro Link Station.

2.3 EXISTING LAND USES AND REGULATORY SETTING OF THE PROJECT SITE

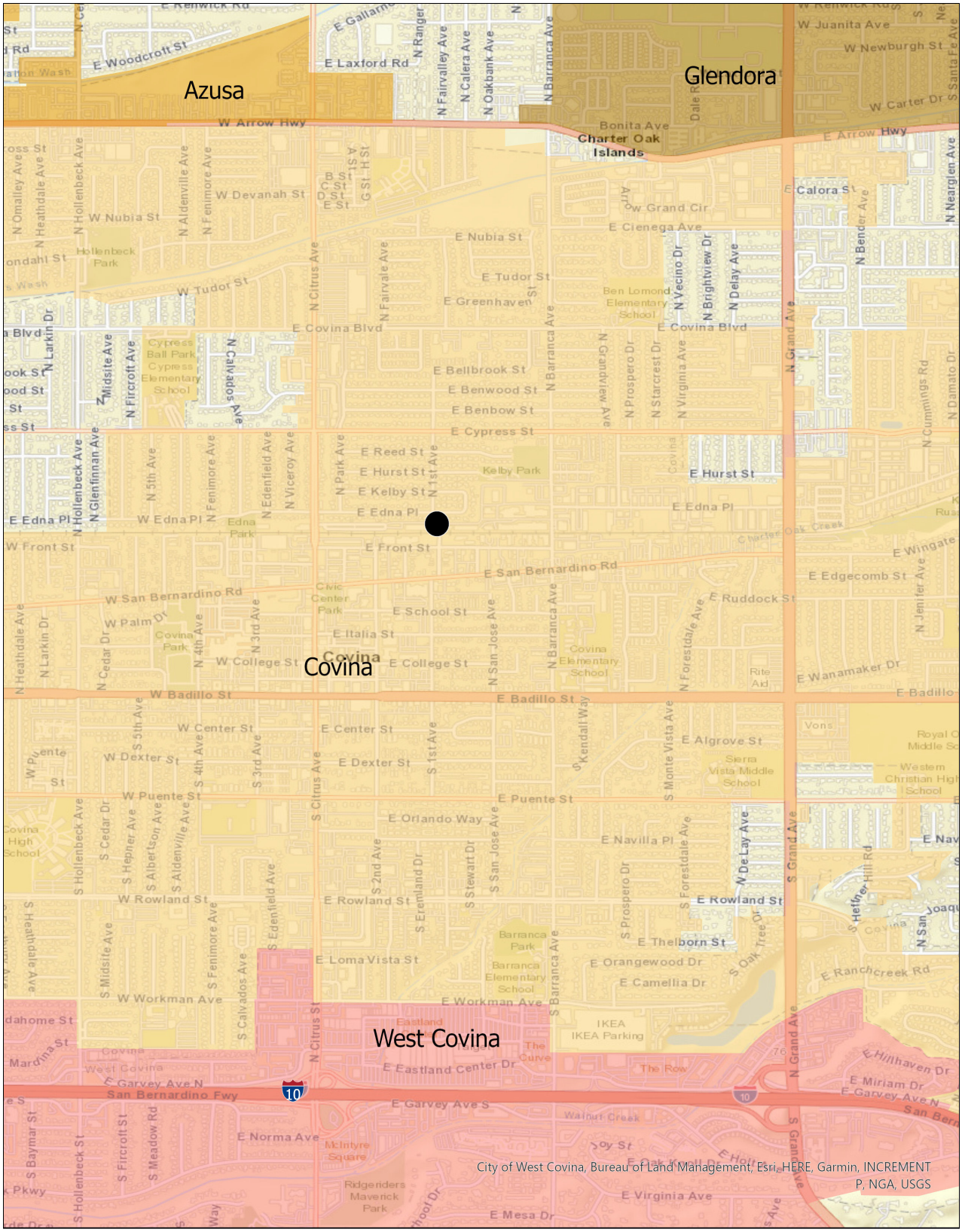
The Project site is located within the Town Center Specific Plan and therefore currently has a General Plan land use designation of Town Center Specific Plan (TCSP). As shown on Figure 2-5, *TCSP Designation,* the Project site currently has a zoning designation of Food Arts Industrial Residential (F.A.I.R). According to the TCSP, the F.A.I.R Zone is a transitional, "maker's district" combining light industrial uses with creative uses such as artist studios and galleries, live/work units, restaurants, small-scale craft breweries, warehouses, incubator industrial uses, research and technology uses, and creative office activities. Stand-alone multifamily residential uses are permitted in new and adaptive reuse structures. Adaptive reuse of existing structures and the establishment of shared parking, open spaces for recreation and public gathering are prioritized.

2.4 SURROUNDING LAND USES

The Project site is located within a developed, residential area within the City of Covina as described below:

	Existing Land Use	**General Plan Designation**	**Zoning Designation**
North	Single-Family Residences	Low Density Residential	Single-Family Residential (R-1-7500)
West	Covina Metro Link Station	Town Center Specific Plan	Rail
South	Commercial and warehouse buildings with storage lots	Town Center Specific Plan	Food Arts Industrial Residential (F.A.I.R)
East	Warehouse buildings	Town Center Specific Plan	Food Arts Industrial Residential (F.A.I.R)

Regional Location



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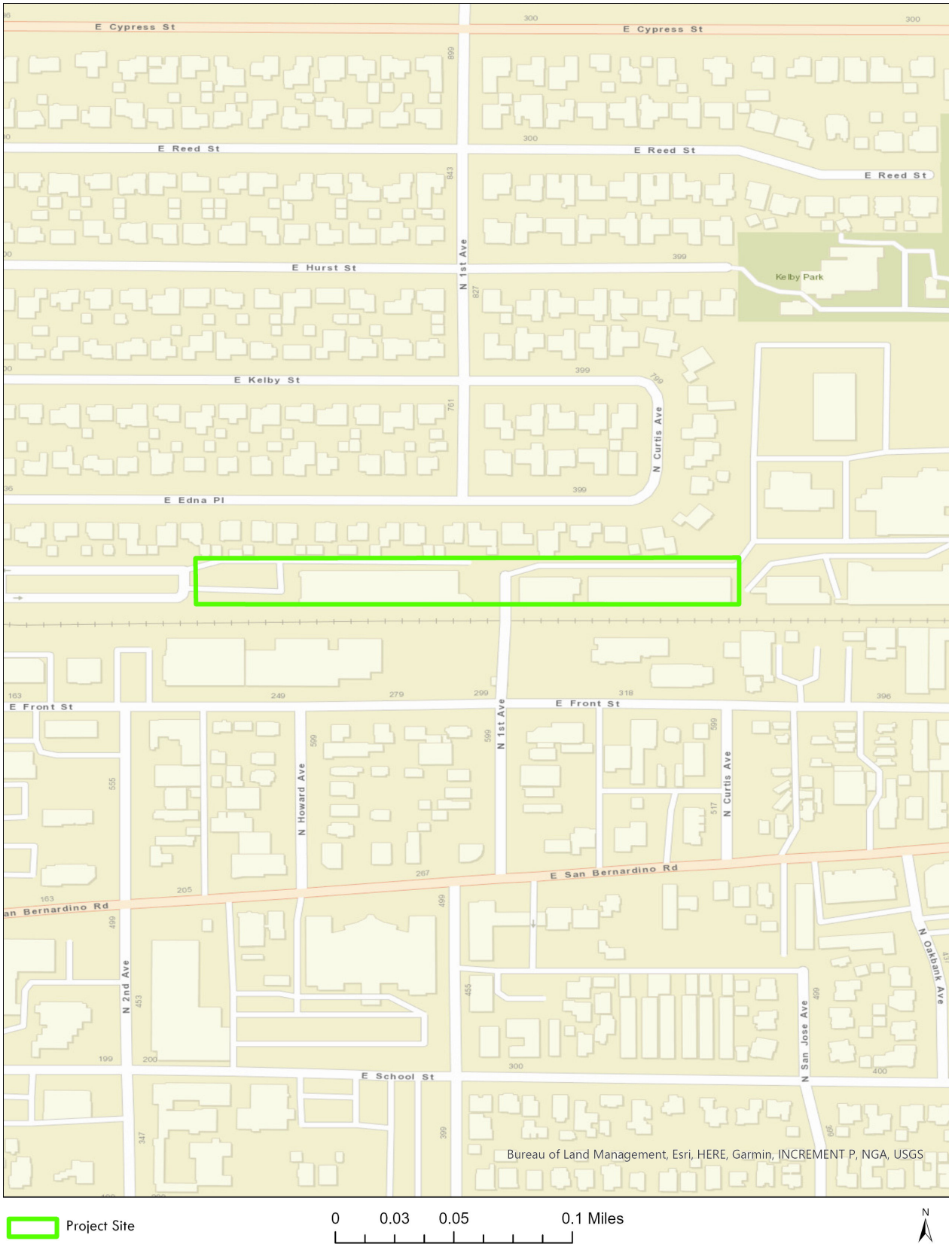
Local Vicinity



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Aerial View


Florence Avenue
Maxar, Microsoft
Project Site
0 0.02 0.03 0.07 Miles
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Views of western building.

Views fo the eastern building.

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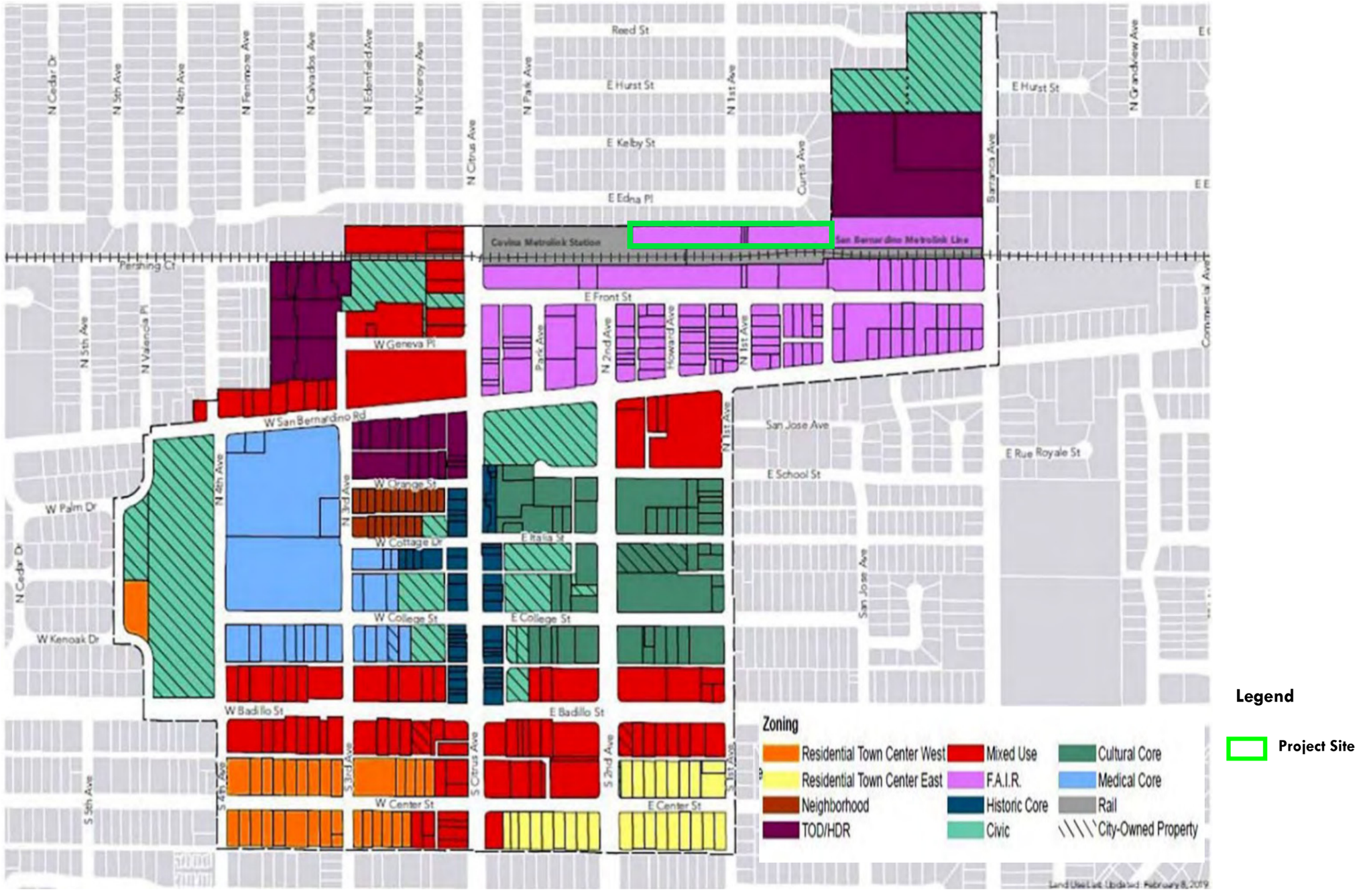
TCSP Designation



Legend

Project Site

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3 PROJECT DESCRIPTION

3.1 PROPOSED PROJECT

Project Overview
The Project proposes the adaptive reuse of the two existing warehouse buildings (west and east buildings) with a recreation village ("Project" or "proposed Project"), which would include interior and exterior improvements to site including, a dog park, pocket park, library, historical memorial, fitness center, rock climbing area, City Parks & Recreation offices, and an indoor recreation complex, as shown on Figure 3-1, *Conceptual Site Plan*. The Project would provide pedestrian pathways and drive aisle connections to the Metro Link Station and adjacent Vita Pakt residential development.

Indoor Recreation Improvements
Library
The Project would construct interior improvements on the west building to develop an approximalty10,216 square foot (SF) public library. The library would include a 5,578 SF open area with computers, seating, and book stacks. It would also include a 787 SF office/workroom/storage space, a 514 SF computer lab, two restrooms, three multipurpose rooms, and three meeting rooms, as shown on Figure 3-2, *Conceptual Library Floor Plan*.

Indoor Fitness Center
The Project would construct interior improvements on the west building to develop an approximately 7,980 SF fitness center. The fitness center would include a reception/lobby area, yoga studio, two fitness studios of. The center would also include a open fitness area, two all-gender restrooms with showers, and male and female restrooms, as shown on Figure 3-3, *Conceptual Indoor Fitness Center Floor Plan*.

Parks & Recreation Offices
The Project would construct an approximately 3,830 SF addition to the east building to provide a new City Parks & Recreation office space. The office space would include a lobby, open office area, five staff offices, two restrooms, a conference room, break room, and two storage rooms, Figure 3-4, *Conceptual Parks & Recreation Offices Floor Plan*.

Gymnasium
The proposed Project would construct interior improvements on the east building to develop an approximately 14,643 SF gymnasium with two basketball/volleyball courts. The gymnasium would include male and female restrooms and an all-gender restroom with a shower, as shown on Figure 3-5, *Conceptual Gymnasium Floor Plan*.

Outdoor Recreation Improvements
Pocket Park
The proposed Project would construct an entry plaza with a 2,858 SF pocket park that would include native plants and shrubs at the site's western property line, as shown on Figure 3-1, *Conceptual Site Plan*.

Dog Park
Additionally, the Project would develop an 8,165 SF dog park. The dog park would include a 7,105 SF dog agility center and park with dog agility equipment, grass area and fencing. It would also include a 971 SF outdoor, covered dog training structure, as shown on Figure 3-1, *Conceptual Site Plan*. A Plexiglas or glass wall would separate the dog park area from the train tracks.

Outdoor Library Seating & Coffee Kiosk
The Project would include a 410 SF coffee kiosk adjacent to the proposed library and dog park. It would also include a covered outdoor seating area for use by library and coffee kiosk patrons, as shown on Figure 3-6, *West Building Rendering*. The southern exterior library building wall would feature a Covina historical

walk with multiple mural displays showing moments from Covina's history, as shown on Figure 3-1, C*onceptual Site Plan*. A Plexiglas or glass wall would separate the historical walk from the train tracks.

Rock Climbing
The Project would construct an approximately 3,381 SF rock climbing area with an approximately 40-foot tall climbing tower that is fenced, as well as lockers to the east of Building 1, as shown on Figure 3-1, C*onceptual Site Plan*, and Figure 3-*7*, *East Building Rendering*

Outdoor Fitness Area
The Project would include a 1,589 SF outdoor fitness area that would be attached to the proposed gym within the west building, as shown on Figure 3-1, C*onceptual Site Plan*. A Plexiglas or glass wall would separate the outdoor historical walk from the train tracks.

Access and Parking
Primary access to the site would be provided via a driveway connecting to the Metro Link Station parking lot on N. Citrus Avenue. Secondary emergency access and maintenance access would be provided via a gated entrance in the northeast corner of the site. The Project would provide approximately 42 parking spaces.

Landscaping & Fencing
The project would install new drought tolerant ornamental landscaping throughout the Project site, which would include 15 gallon and 24-inch box trees. In addition, a variety of ornamental shrubs, vines, and groundcovers would be installed.

The Project would include a 6-foot high Plexiglas or glass wall along the southern property line in order to screen the proposed outdoor seating areas from the Metro Link line. The at least 6-foot high Plexiglas or glass wall would start at the eastern edge of the western building and proceed to the western property line where it would proceed for approximately 10 feet in a L-shape, as shown on Figure 3-1, C*onceptual Site Plan*.

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

Infrastructure Improvements
Water
The Project would utilize the existing onsite water lines that connect to the water main in N. Citrus Avenue.

Sewer
The Project would utilize the existing onsite sewer system comprised of 6-inch and 8-inch gravity sewer lines that connect to the existing sewer system in N. Citrus Avenue.

Drainage
In the developed condition, stormwater and surface water onsite be conveyed as surface flow to the Project's backbone storm drain system and conveyed westerly and then southerly to the southwestern corner of the Project site. The southwestern corner of the Project site would include an infiltration basin.

3.2 CONSTRUCTION

Construction activities would last approximately 18 months and would include the following: (1) construction of building additions (2) interior retrofitting; and (3) paving and application of architectural coatings. Interior

retrofitting would include asbestos abatement by a Cal/OSHA licensed asbestos abatement contractor in accordance with Title 8 of California Code of Regulations (CCR) 1529 and South Coast Air Quality Management District (SCAQMD) Rule 1403. Additionally, any necessary lead stabilization activities would be performed by a California Department of Public Heath licensed abatement contractors. Construction activities would be limited to the hours between 7:00 am to 8:00 pm, Monday through Saturday, excluding federal holidays, which would be consistent with the City's Noise Ordinance (Municipal Code Section 9.40.110(A)).

4 DISCRETIONARY APPROVALS

The following discretionary approval and permits are anticipated to be necessary for implementation of the proposed Project:

- Lot Merger Approval
- Site Plan Approval

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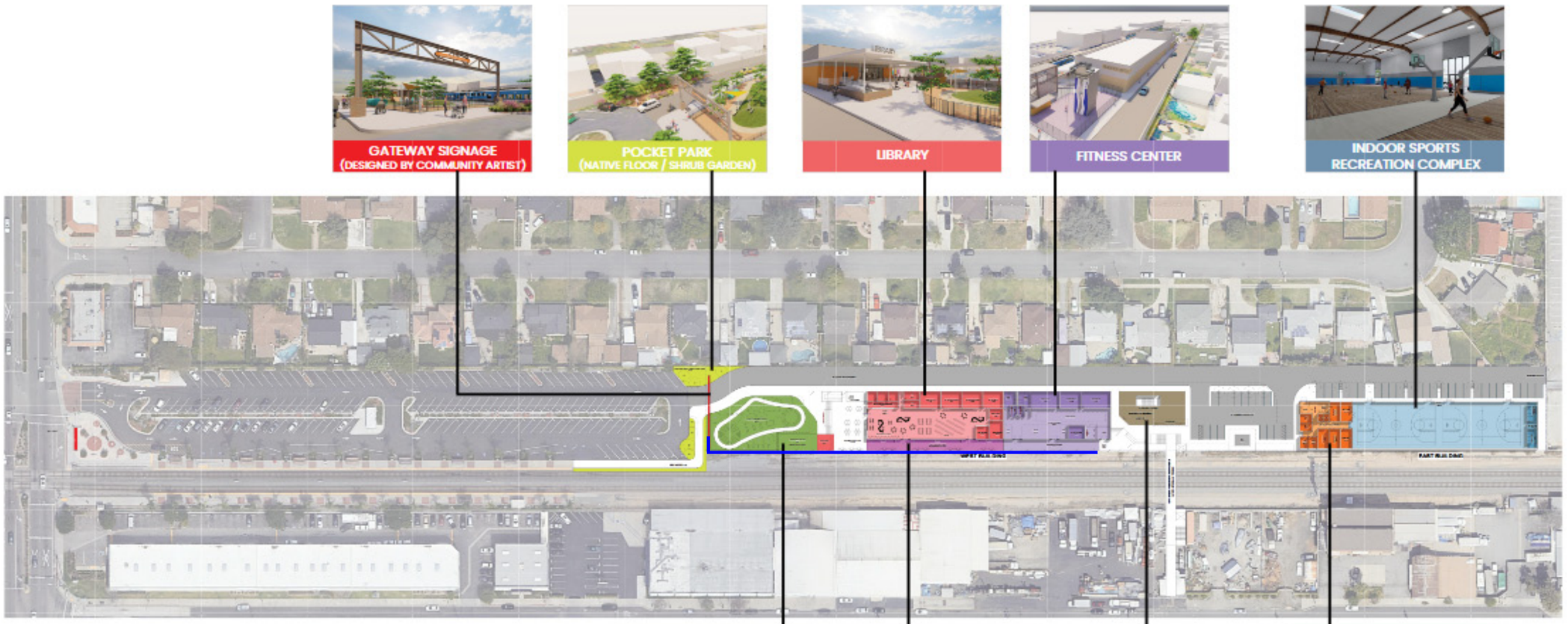
Conceptual Site Plan



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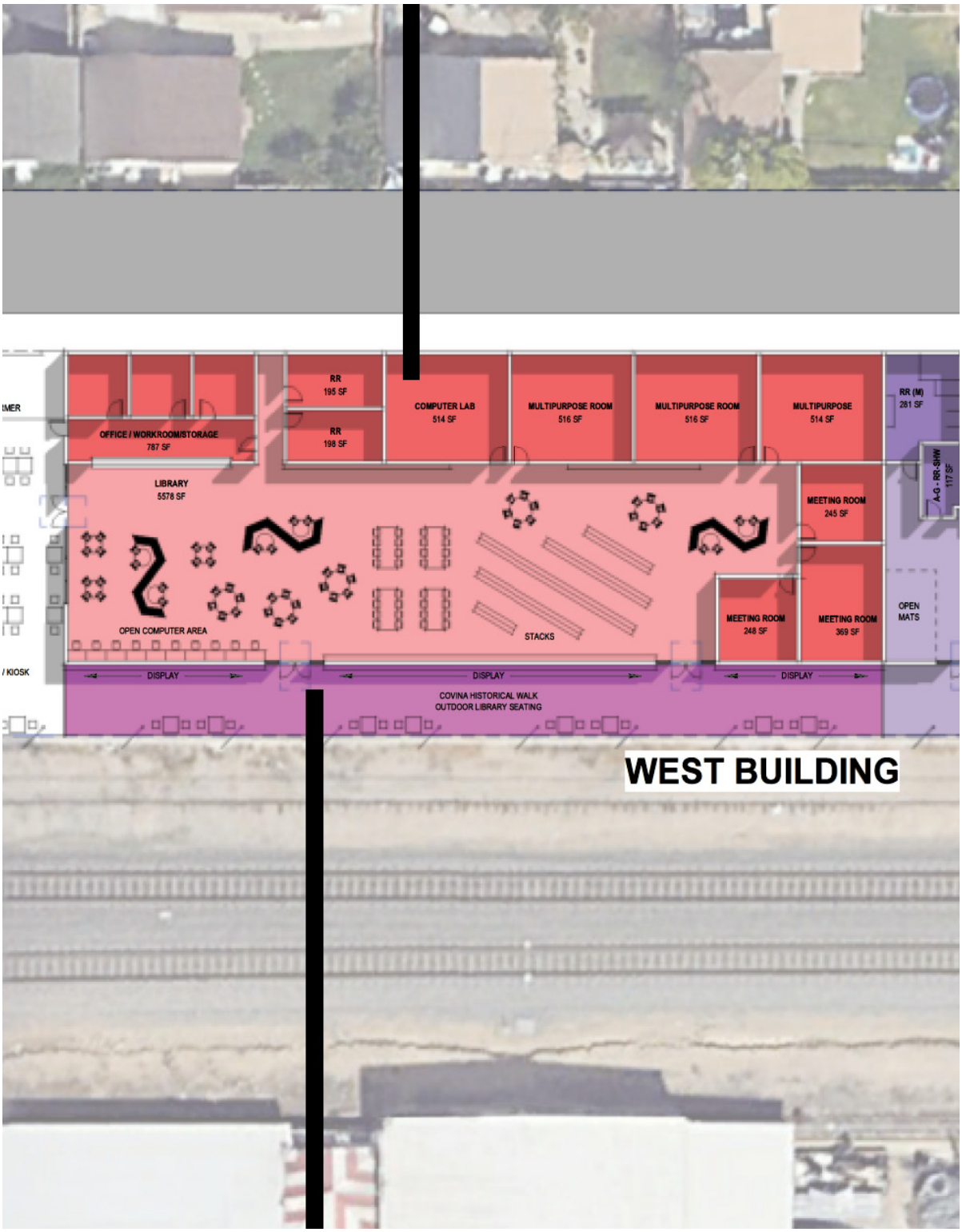
Conceptual Library Floor Plan



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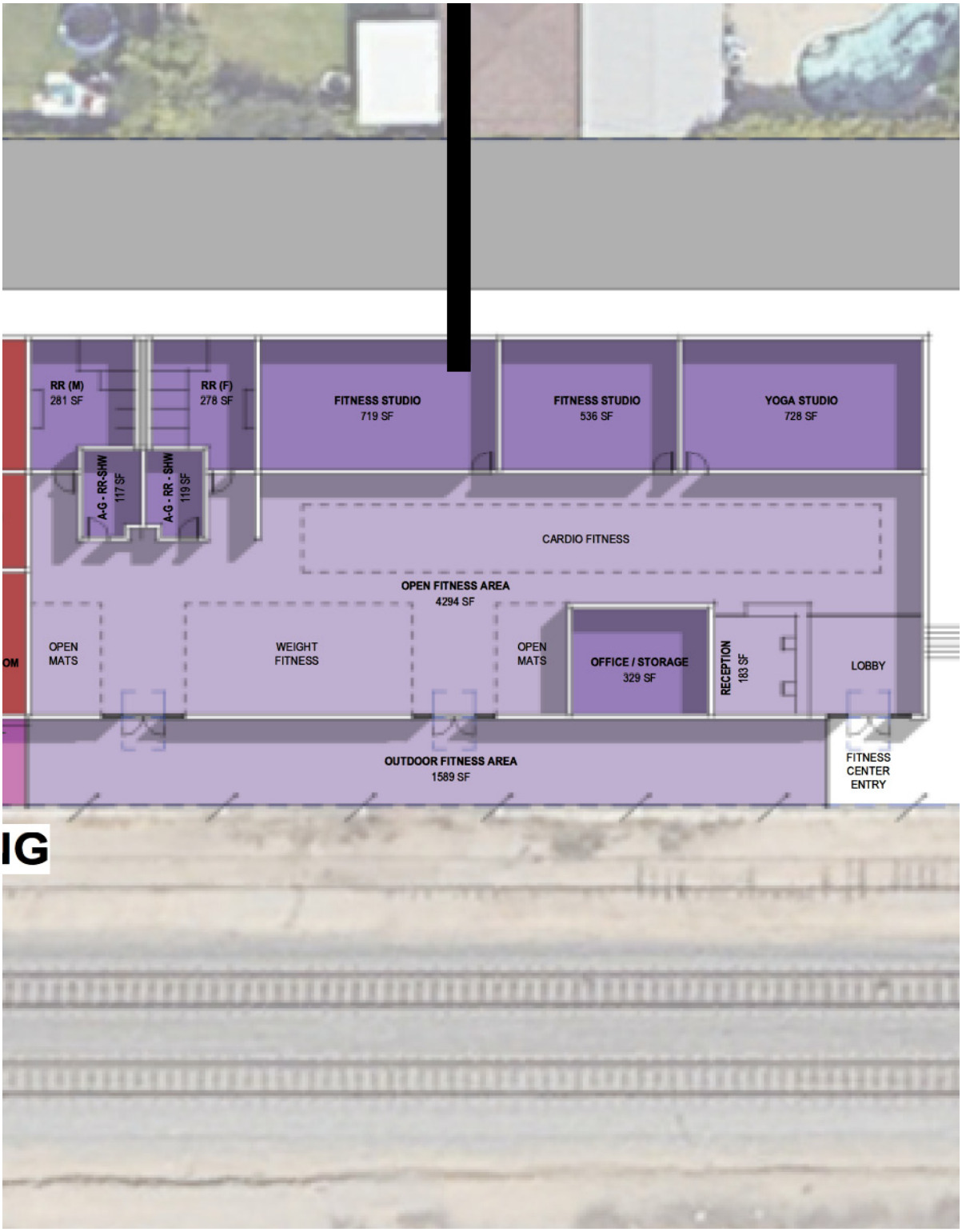
Conceptual Indoor Fitness Center Floor Plan



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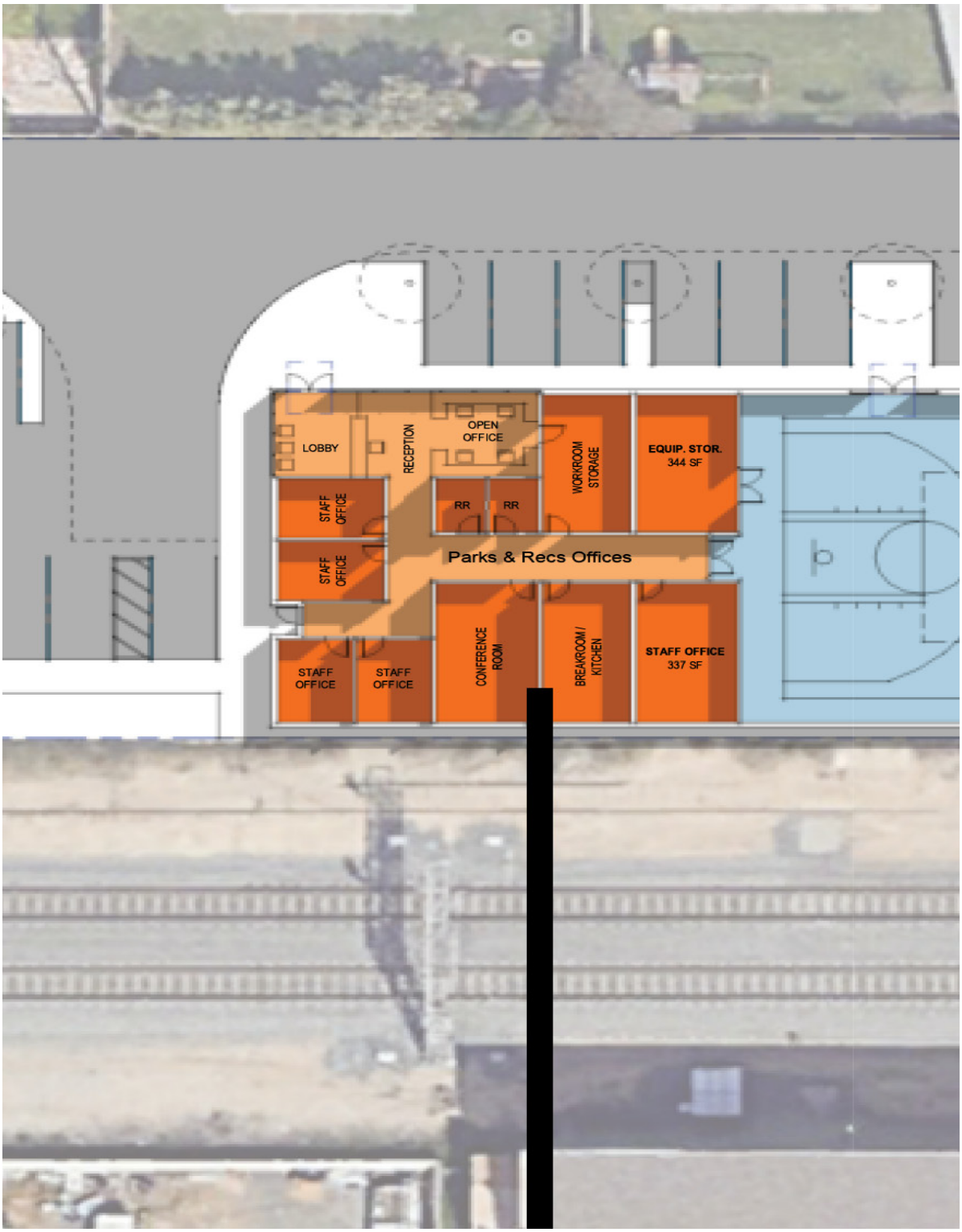
Conceptual Parks and Recreation Offices Floor Plan



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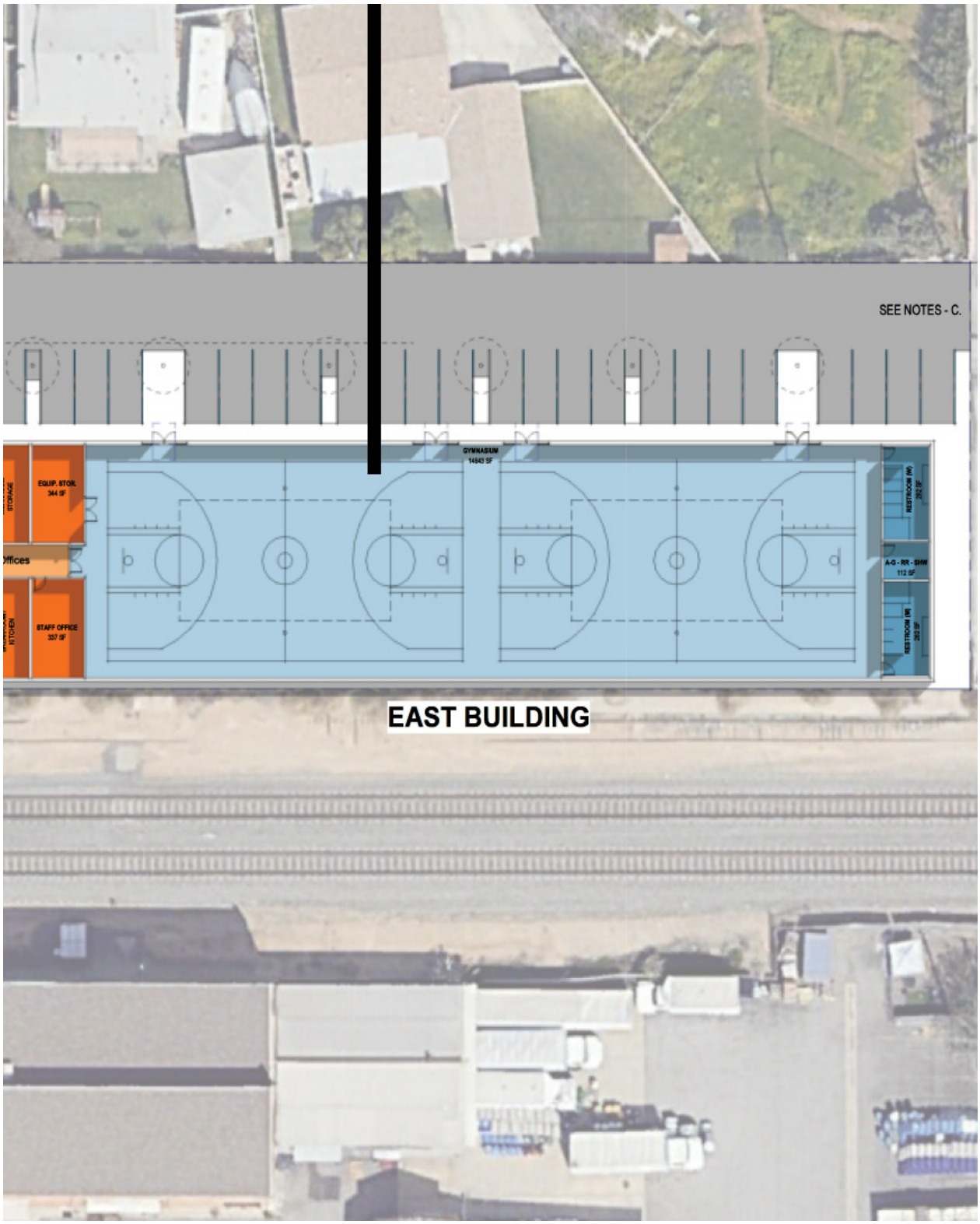
Conceptual Gymnasium Floor Plan



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West Building Rendering

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East Building Rendering

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5 CLASS 32 INFILL EXEMPTION REQUIREMENTS

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA.

Class 32 Infill Exemption
One of the classes of projects exempt from CEQA review are projects that are specified as urban infill development. CEQA Guidelines Section 15332 defines the Class 32 Infill Exemption as a project that meets the following five requirements:

a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c) The project site has no value as habitat for endangered, rare or threatened species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e) The site can be adequately served by all required utilities and public services.

Exceptions
In addition to meeting the five requirements stated above, the CEQA Guidelines Section 15300.2 provides specific instances where exceptions apply to a project that would otherwise meet the requirements for an exemption. These exceptions are:

a) Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c) Significant Effects: A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) Scenic Highways: A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e) Hazardous Waste Sites: A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code.

f) Historical Resources: A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resources.

5.1 PROPOSED PROJECT CEQA EXEMPTION

The analysis below provides substantial evidence that the Project properly qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment. Additionally, the analysis shows there are no exceptions to qualifying for the categorical exemption, as identified in CEQA Guidelines Section 15300.2.

a. Criterion Section 15332(a): General Plan and Zoning Consistency: *The Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*

The City of Covina General Plan land use designation for the Project site is Town Center Specific Plan (TCSP), and the existing zoning designation of the site is Food Arts Industrial Residential (F.A.I.R). Per the TCSP, the F.A.I.R zone is a transitional, "maker's district" combining light industrial uses with creative uses such as artist studios and galleries, live/work units, restaurants, small-scale craft breweries, warehouses, incubator industrial uses, research and technology uses, and creative office activities. Stand-alone multifamily residential uses are permitted in new and adaptive reuse structures. Adaptive reuse of existing structures and the establishment of shared parking, open spaces for recreation and public gathering are prioritized.

Table 1 shows the Project's consistency with F.A.I.R Development Standards. As shown, the proposed Project would meet all of the requisite development standards, including lot size, setback, landscaping, and parking requirements. Therefore, the Project would be consistent with the applicable zoning regulations.

Table 1: F.A.I.R Development Standards

Development Standard	Required	Provided
Non-Residential Building Intensity (FAR) for sites 0.51 acre or more	Stand-Alone Industrial: 0.75 Stand-Alone Commercial: 1.0 Mixed Use: 2.0	0.33
Maximum Building Height	3 stories, 35'	1 story, 35'
Ground Floor Height	14' minimum	35'
Front Setback	No minimum, 5' maximum if used for landscaping or pedestrian amenities	
Side Setback- Adjacent to Nonresidential Use or Zoning District other than R-1	No minimum	N/A
Side Setback- Adjacent to Existing Residential, School, or Park Use	10' minimum	26 feet
Rear Setback	No requirement	10 feet
Rear Setback- Adjacent to R-1 or R-2 Zoning Districts	Where a building is adjacent to an existing R-1 zone along its side and/or rear property lines, the first 2 stories of a structure shall be set back a minimum of 10' from the side and/or rear property line. The building shall step back a minimum of 30' from the adjacent side and/or rear	N/A

	property line for a third story and any story above.	
Rail Setback	Minimum 5' setback from rail right-of-way	5 feet
Parking	1 space for every 200 SF of ground floor area	42 parking spaces

b. Criterion Section 15332(b): Project Location, Size, and Context: *The proposed development occurs within City limits on a Project site of no more than five acres substantially surrounded by urban uses.*

The Project is within the city limits of the City of Covina, on a 2.5-acre site, directly to the east of the Covina Metro Station on N. Citrus Avenue. As shown on Figure 2-2 and detailed in Section 2.3, the site is surrounded by single-family residences on the north side, a multi-family residential development to the east, the Metro Line followed by warehouses to the south, and the Covina Metro station to the east. As the Project site is less than five acres and substantially surrounded by urban uses, it meets the criteria of CEQA Guidelines Section 15332(b).

c. Criterion Section 15332(c): Endangered, Rare, or Threatened Species: *The Project site was determined to have no value as habitat for endangered, rare or threatened species.*

The 2.5-acre Project site is vacant, but completely developed with two warehouse buildings and paving. As such, the whole Project site has been disturbed by previous development and does not contain any endangered, rare or threatened species. In addition, as a standard condition of approval, the Applicant is required to comply with Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). Compliance with the California Fish and Game Code and MBTA would ensure that impacts to nesting birds and raptors, which may use vegetation, including existing scattered non-native trees, on or near the Project site for nesting, during construction would not occur.

Furthermore, the Project would be required to implement TCSP EIR Mitigation Measure BIO-1, as described below, which would require nesting bird surveys pursuant to the MBTA and California Fish and Game Code.

Applicable TCSP EIR Mitigation Measures

The following mitigation measures were included in the TCSP FEIR and are required to be implemented by projects within the TCSP Area to reduce impacts related to biological resources within implementing projects:

Mitigation Measure BIO-1: If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist (as determined by a combination of academic training and professional experience in biological sciences and related resource management activities) no more than five (5) days prior to the beginning of project-related activities (including but not limited to equipment mobilization and staging, clearing, grubbing, vegetation removal, and grading).

Surveys shall be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys shall be conducted within a 250-foot radius surrounding the work area (in areas where access is feasible). For larger raptors, such as those from the genus Buteo, the survey area shall encompass a 500-foot radius. Surveys shall be conducted during weather conditions suited to maximize the observation of possible nests and shall concentrate on areas of suitable habitat.

If a lapse in project-related work of five (5) days or longer occurs, an additional nest survey shall be required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist shall determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities. If the qualified biologist determines construction activities have potential to adversely

affect a nest, the biologist shall immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 50 feet for songbird nests, and 200 to 500 feet for raptor nests, depending on species and location. Active nest(s) within the Project Site shall be monitored by a qualified biologist during construction if work is occurring directly adjacent to the established no-work buffer. Construction activities within the no-work buffer may proceed after a qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation, or other non-anthropogenic nest failure).

For the reasons described above, the proposed Project site has no value as habitat for endangered, rare or threatened species and meets the criteria of CEQA Guidelines Section 15332(c).

d. Criterion Section 15332(d): Significant Effects: *Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

TRAFFIC

The Project proposes the construction of a warehouse and associated office space on the previously undeveloped site. The Project trip generation was prepared using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation*, 11th Edition (2021).

As shown in Table 2, the operation of the proposed Project would generate 1,693 daily trips including 74 trips during the a.m. peak hour and 159 trips during the p.m. peak hour as calculated using trip rates from the Institute of Transportation Engineers (ITE).

Table 2: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use	**Units**		**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
Public Park[1]		Acres	290.673	0.012	0.008	0.020	40.787	33.371	74.158
Library[2]		TSF	70.553	0.268	0.109	0.377	3.705	4.013	7.718
Recreational Community Center[3]		TSF	28.553	1.261	0.649	1.910	1.761	1.985	3.746
Project Trip Generation									
Parks and Memorial	0.305	Acres	89	0	0	0	12	10	23
Library	10.626	TSF	750	3	1	4	39	43	82
Rec Community Center	30.310	TSF	865	38	20	58	53	60	114
Total Trip Generation			1704	41	21	62	105	113	218

TSF = Thousand Square Feet

[1] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition,* 2021. Land Use Code 411 - Public Park, fitted curve equation used where avaliable.

[2] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition,* 2021. Land Use Code 590 - Library, fitted curve equation used where available.

[3] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition,* 2021. Land Use Code 495 - Recreational Community Center, fitted curve equation used where avaliable.

Source: Trip Generation and VMT Screening Analysis, Appendix A

The *City of Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* states impact thresholds and screening thresholds to determine if projects would require a vehicle-miles traveled (VMT) analysis. The City's Guidelines provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

1. The project is located within a Transit Priority Area (TPA).
2. The project is located in a low VMT generating area.
3. The project is locally serving or generates less than 110 daily vehicle trips.

The applicability of each criterion to the proposed Project is discussed below.

Screening Criteria 1 - Transit Priority Area Screening: According to the City's guidelines, projects located in a TPA may be presumed to have a less than significant impact. The project is located in a TPA as shown in Figure 2 however, the proposed Project has an FAR of less than 0.75. Therefore, Screening Criteria 1 cannot be applied to screen the Project from requiring a VMT analysis.

Screening Criteria 2 - Low VMT Area Screening: According to the City's guidelines, employment-related and mixed-use land use projects may be presumed to have a less than significant impact if the projects can be reasonably expected to generate VMT per resident, per worker, or per service population that is similar to existing land uses in the low VMT area. The SGVCOG VMT Evaluation Tool was used to determine if the proposed project lies in a low VMT area. As shown in the Trip Generation and VMT Screening Analysis, the Project site is located in a low VMT area. Therefore, the Project will screen from requiring a VMT analysis as per Screening Criteria 2.

Screening Criteria 3 – Local Serving Land Use or Trip Generation Screening: According to the City's guidelines, projects that serve the local community and have the potential to reduce VMT would not be required to complete a VMT assessment. These types of projects include K-12 schools, local serving retail, day care centers, student housing and other community institutions. The Project proposes a recreational center inclusive of library, gym and a fitness center and therefore would be considered a local serving land use.

Therefore, the Project is a locally serving land use and lies in a low VMT generating area would therefore satisfy Screening Criteria 2 and Screening Criteria 3. As such, VMT impacts would be considered less than significant.

The Project vicinity contains sidewalks and a Class II bike lane along N. Citrus Avenue. During Project construction, the existing sidewalk portion and bike lane would remain available. The proposed Project would improve pedestrian and bicycle circulation by providing access between the Covina Metro Link station and the nearby VitaPakt multi-family development.

Public transit in the Project vicinity is provided by Metro, which operates a commuter rail line with eastbound and westbound service at the Covina Station, located directly to the west of the Project site, every 19 to 37 minutes Monday to Friday, with peak hourly weekday activity occurring during the AM and PM commuter periods. The proposed Project would not result in any interruptions to Metro Link services, and Project employees and visitors could utilize the station for public transit.

The proposed Project would not result in any significant effects relating to traffic; therefore, the proposed Project meets the traffic related criteria of CEQA Guidelines Section 15332(d).

NOISE

Noise Terminology

Various noise descriptors are utilized in this noise analysis, and are summarized as follows:

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1-hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 pm to 10:00 pm and after an addition of 10 dBA to noise levels between the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

Ambient Noise: The "ambient noise level" is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Applicable TCSP EIR Mitigation Measures

The following mitigation measures were included in the TCSP FEIR and are required to be implemented by projects within the TCSP Area to reduce impacts related to noise and vibration within implementing projects:

MM NOI-1: Confirm Compliance with Applicable Noise Standards Requirements.
Prior to the issuance of a building permit for any development in the Planning Area, the City shall review and approve an acoustical analysis, prepared by or on behalf of the project Applicant, and based on the final project design that:

1. For residential development:
    a. Identifies exterior noise levels at all exterior building façade locations and exterior recreation areas, including open space area, patios, and roof decks; and
    b. Identifies the final site and building design features that would:
        i. Reduce daytime, exterior noise levels at open space areas, patios, and roof deck areas to less than 55 dBA and 60 dBA Leq (1-hour) for low-density residential and medium- to high-density residential, respectively, consistent with the standards identified in City Municipal Code Section 9.40.040[1]; and
        ii. Attenuate exterior building façade noise levels so interior levels do not exceed 45 dBA DNL in habitable rooms, 45 dBA Leq (1-hour) during the daytime, and 35 dBA Leq (1-hour) during the nighttime, consistent with the standards identified in City Municipal Code Section 9.40.060. Potential noise insulation site and building design features capable of achieving this requirement may include, but are not limited to:
            - Sound barriers
            - Enhanced exterior wall construction/noise insulation design
            - Use of enhanced window, door, and roof assemblies with above average sound transmission class (STC) or outdoor/indoor transmission class (OITC) values
            - Use of mechanical, forced air ventilation systems to permit a windows closed condition in residential units.
2. For non-residential development:
    a. Identifies exterior noise levels at all exterior building façade locations, and
    b. For projects that have an exterior wall exposed to noise levels of 65 dBA Leq (1- hour) or more, comply with Section 5.507.4 of the California Green Building Standards Code. Per Section 5.507.4 of the California Green Building Standards Code, non-residential projects exposed to an exterior noise level of 65 dBA Leq (1- hour) shall be required to have wall and roof-ceiling assemblies with a composite sound insulation rating of STC 50 or higher, exterior windows that have a minimum STC of 40, or assemblies that reduce interior levels to 50 dBA Leq (1-hour) or lower.

[1] Based on Municipal Code Section 9.40.040, the allowable noise level or sound level shall be the higher of the following: A. Actual measured ambient level; or B. 60 dBA Leq for daytime and 55 dBA Leq for nighttime.

Plan Requirements and Timing: An acoustical report shall be submitted to City Planning for review and approval prior to final sign off on construction, documenting that actual interior and exterior noise level at the locations indicated in this measure meet City and State standards. Monitoring: City Planning staff shall approve the acoustical analysis prior to sign off of final construction.

MM NOI-2: Confirm Compliance with Applicable Vibration Standards.
Prior to the issuance of a building permit for any institutional buildings within 60 feet of the Metrolink rail corridor or structures containing dwelling unit(s) within 40 feet of the Metrolink rail corridor, the City shall review and approve a vibration report, prepared by or on behalf of the project Applicant, and based on the final project design that:

1. Demonstrates vibration noise levels from the Metrolink would be below the appropriate (e.g., residential, commercial) FTA impact criteria at the proposed structure(s), as they are applicable to the proposed land use; or
2. Identifies the final site and building design features that would reduce groundborne vibration from Metrolink operation, such that receptors would not be exposed to vibration levels in excess of applicable FTA impact criteria.

Plan Requirements and Timing: A vibration report shall be submitted to City Planning for review and approval prior to final sign off on construction, documenting vibration at proposed structures would be below applicable FTA impact criteria, or documentation prepared by a qualified engineer that demonstrates building design would reduce interior groundborne vibration to below FTA impact criteria. Monitoring: City Planning staff shall approve the vibration analysis prior to sign off of final construction.

Noise Regulations

City of Covina Municipal Code

Municipal Code Section 9.40.040, Exterior Noise Standards: Table 3 provides the City's Municipal Code exterior noise standards.

Table 3: City of Covina Exterior Noise Standards

Land Use	7:00 a.m. – 10:00 p.m.	10:00 p.m. - 7:00 a.m.
Residential Estate or Agricultural	50 dBA	40 dBA
Residential Low Density	55 dBA	45 dBA
Residential Medium and High Density	60 dBA	50 dBA
Commercial	65 dBA	55 dBA
Industrial	70 dBA	60 dBA

Source: Municipal Code Section 9.40.040

Municipal Code Section 9.40.060, Interior Noise Level Limits: Table 4 provides the Municipal Code interior noise level limits for residential dwellings that apply to a windows closed condition.

Table 4: City of Covina Municipal Code Interior Noise Standards

Land Use	7:00 a.m. – 10:00 p.m.	10:00 p.m. - 7:00 a.m.
Residential (All Densities)	45 dBA Leq (1-hr)	35 dBA Leq (1-hr)

Source: Municipal Code Section 9.40.060

Municipal Code Section 9.40.060 further specifies that the above standards shall not be exceeded by 5 dBA Leq for a cumulative period of more than one minute or more in any hour, or 10 dBA or the maximum measured ambient for any period of time. Subsection F states all newly constructed residential dwellings

located in areas that are exposed to ambient noise levels in excess of 60 dBA DNL be designed and built so all habitable rooms comply with these standards.

Municipal Code Section 9.40.090, Controlled Hours of Operation: It is unlawful for any period to operate, permit, use, or cause to operate any of the following other than between the hours of 7:00 AM and 8:00 PM of any one day:

- Powered model vehicles;
- Loading and unloading vehicles such as garbage trucks, forklifts, or cranes in a residential area or within 500 feet of a residence;
- Domestic power tools;
- Law equipment, including, but not limited to: lawn mowers, edgers, cultivators, chainsaws, and leaf blowers in any residential area or within 500 feet of any residence;
- Equipment associated with the repair and maintenance of any real property.

Municipal Code Section 9.40.110, Construction: It is unlawful to operate equipment or perform outside construction or repair work within 500 feet of a residential land use between the hours of 8:00 PM of any one day and 7:00 AM of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance.

Municipal Code Section 9.40.120, Loud and Unusual Noises. Prohibits the operation of any device that creates a vibration that is above the vibration perception threshold of an average individual at or beyond the property boundary of the source if on a private property or at 150 feet from the source if on a public space or public right-of-way. Per Section 9.40.020(30) the threshold of perception is considered by the City to be 0.01 in/sec.

Construction. To evaluate whether the Project would generate potentially significant construction noise levels at off-site sensitive receiver locations, a construction-related noise level threshold is adopted from the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The construction related noise level threshold starts at 85 dBA for more than 8 hours per day, and for every 3 dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than 4 hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, most conservative construction noise level threshold of 85 dBA Leq over a period of 8 hours or more is used to evaluate the potential Project-related construction noise impacts at nearby sensitive receptors.

Construction Noise: Municipal Code Section 9.40.110 states that construction noise is exempt from noise standards with the following measures:

Noise sources associated with outside construction or repair work provided said activities:

a. When within 500 feet of a residential land use, the noise generating activity does not take place between the hours of 8:00 PM and 7:00 AM on weekdays, including Saturday, or at any time on Sunday or a public holiday.

The Project would comply with the City's construction hours regulations, as required by standard City Conditions of Approval. To evaluate whether the Project would generate potentially significant short-term noise levels at off-site sensitive receiver locations a Noise Assessment was prepared for the Project, included herein as Appendix B. The Noise Assessment utilized a construction-related NIOSH noise level threshold of 80 dBA Leq is used. For the purpose of the Noise Assessment, the nearest sensitive receptor is located at the residents directly adjacent to the north boundary of the Project site.

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that, when combined, can reach high levels. Construction is expected to occur in the following stages: excavation and grading, building construction, architectural coating, and paving. Noise levels generated by heavy construction equipment can range from approximately 74 dBA to 84 dBA when measured at 50 feet, as shown on Table 5.

Table 5: Construction Equipment Noise Levels

Construction Equipment	Noise Level at 25 Feet (dBA, L_{eq})	Noise Level at 50 Feet (dBA, L_{eq})
Chain Saw	82.7	76.7
Compactor (Ground)	82.2	76.2
Concrete Pump Truck	81.4	74.4
Dozer	83.7	77.7
Dump Truck	78.5	72.5
Excavator	82.7	76.7
Front End Loader	81.1	75.1
Generator	83.6	77.6
Grader	87.0	81.0
Jackhammer	87.9	81.9
Paver	80.2	74.2
Pumps	83.9	77.9
Scraper	85.6	79.6
Tractor	86.0	80.0

Source: FHWA, 2006.

Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. Noise levels would be loudest during the grading phase, which would be limited as the site does not require extensive grading. Construction is anticipated to occur during the permissible hours according to the City's Municipal Code Section 9.40.110 and would be considered significant if construction activities are taken outside the allowable times. Paving operations are expected to be in close proximity to the northern property line adjacent to the existing residential uses. The amount of equipment utilized would be limited due to alignment and work area constraints. Noise levels from paving activities are linear and the equipment would be moving along the property line at an average distance or 20 feet from the existing residences. Based on noise measurements taken at a similar development, the roadway paving operations are anticipated to move along the property line in 200- to 300-foot increments. The average hourly construction noise levels were found to be approximately 72 dBA Leq or lower at 50 feet. At a distance or 20 feet, the noise levels of approximately 76 to 80 dBA may be experienced at local residences at any specific location. There is an existing 6-foot high block wall at the residences that would reduce the noise levels approximately 5 decibels to below an average 75 decibels during an 8-hour period. Therefore, impacts related to construction noise would be less than significant.

Operational Noise: The nearest noise sensitive residential land uses are located adjacent to the Project site along the northern property line. The performance standards found in Section 9.40.040 limit the exterior noise level to the higher of the actual measured ambient noise level or 55 dBA Leq during the daytime hours, and 45 dBA Leq during the nighttime hours at the boundary of residential properties. Additionally, since the measurement location is on the boundary between two zones, the noise level limit of the lower category plus five decibels shall apply. Therefore, the threshold of 60 dBA Leq during the daytime and 50 dBA Leq during the nighttime shall apply.

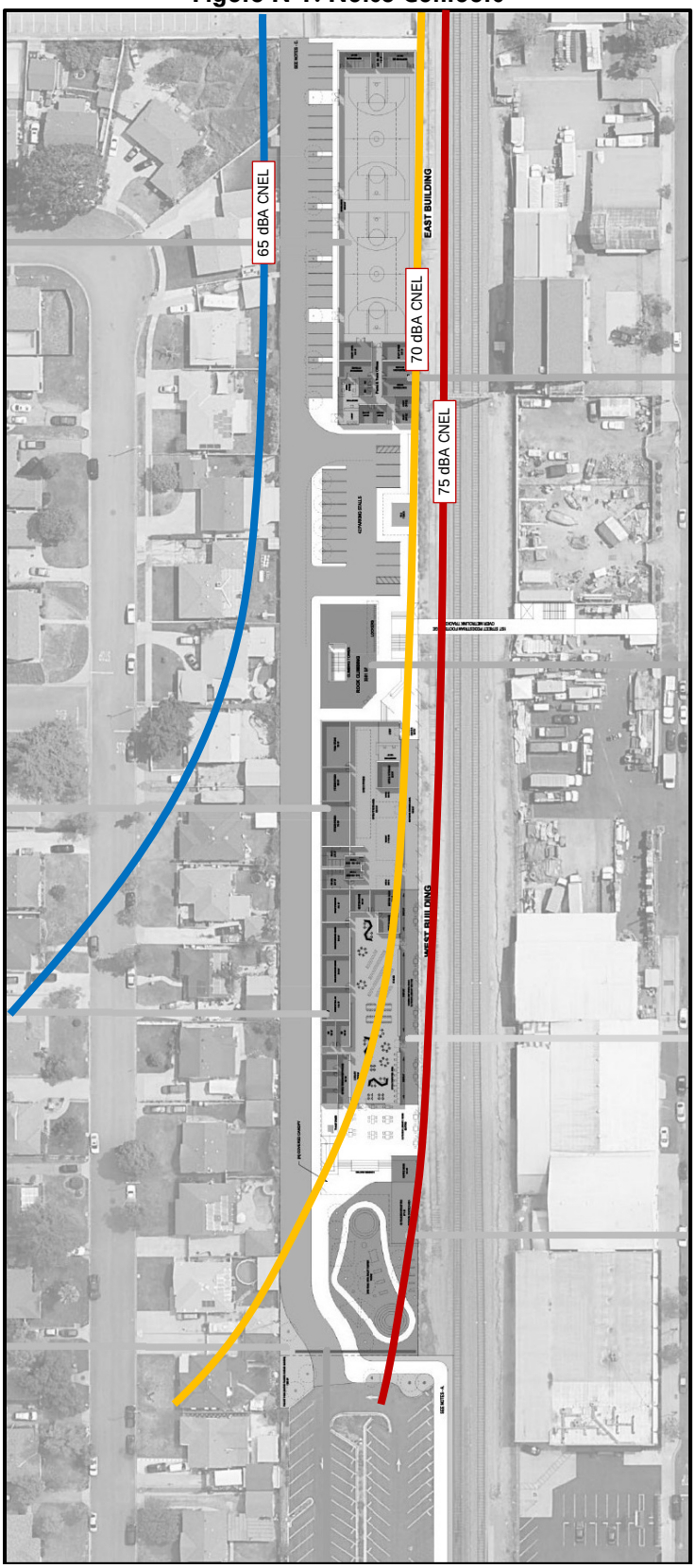
Primary noise sources during Project operation include the dog park, rock climbing facility, and mechanical ventilation (HVAC) system. The recreational amenities, including the dog park and rock climbing facility, would only operate during daytime hours and would not result in noise during nighttime hours. The worst-case onsite operational predictions would still fall below the 60 dBA threshold as shown in Table 6: *Predicted Operational Noise Levels (dBA)*. Therefore, noise generated from operation of the proposed project would not exceed noise standards and would be less than significant.

Table 6: Predicted Operational Noise Levels (dBA)

Source	Reference Noise Level (dBA)	Reference Distance (Feet)	Minimum Distance to Property Line (Feet)	Noise Reduction due to distance (dBA)	Barrier Reductions (dBA)	Resultant Cumulative Noise Level (dBA Leq)
Dog Park	64.7	35	65	-5.4	-6.6	52.7
Rock Climbing	81.0	3	60	-26.0	-6.6	48.4
Transformer	58.0	5	40	-18.1	-6.7	33.2
HVAC	65.9	6	70	-21.3	-11.4	42.2
CUMULATIVE NOISE LEVEL @ PROPERTY LINE (dBA)						**54.4**
Daytime City Standard						**60**
Complies with City Standards						**Yes**

Railway Noise & Vibration. To determine the future noise environment and impact potential from the existing Metro Link San Bernardino Line to the south of the Project site, the results from the long-term noise measurements detailed in the Noise Assessment were used to plot the future noise contours through the project site as shown in Figure N-1, *Noise Contours*. Based on the ambient noise measurements, the 70 dBA contour is located beyond the Project limits without any shielding in the western portion of the Project site. Therefore, the noise sensitive uses including the dog park, outdoor library seating, outdoor fitness area, and the outdoor rock climbing area could experience noise levels that exceed the City noise threshold of 70 dBA for libraries and recreational uses.

Figure N-1: Noise Contours



The Project is proposing a glass barrier along the southern property line, south of the west building which would reduce the noise levels in these outdoor library seating area and coffee kiosk to below the 70 dBA CNEL threshold. A minimum 6-foot Plexiglas wall or similar barrier would be included along the southern and for approximately 10 feet of the western Project boundary along the dog park, which would attenuate noise from the adjacent rail line, and which results in noise levels at the dog park and outdoor library area of approximately 67 dBA, which is well below the 70 dBA CNEL threshold. The proposed wall shall extend from the glass barrier located south of the west building to the western property line. The proposed Plexiglas walls are included as PDF-1, and the proposed location of the walls is demonstrated on Figure 3-1, C*onceptual Site Plan*.

The City of Covina, as part of its noise guidelines, also states, consistent with Title 24 of the California Code of Regulations (CCR), a project is required to perform an interior assessment on the portions of a project site where building façade noise levels are above 60 dBA CNEL in order to ensure a 50 dBA CNEL interior noise level. Therefore, in line with the City of Covina noise regulations and TCSP EIR MM N-1, an interior noise assessment is required prior to the issuance of the first building permit. This final report would identify the interior noise requirements to meet the City's established interior noise limit of 50 dBA CNEL. Therefore, with inclusion of PDF N-1 and adherence to TCSP EIR MM N-1, impacts related to railway noise to the Project site would be less than significant.

As required by TCSP EIR MM N-2, a vibration analysis was prepared to demonstrate vibration noise levels from the Metrolink would be below the appropriate FTA impact criteria for the proposed recreational and office uses. As discussed in the Noise Study, the Metro Link is estimated to generate groundborne vibration levels of approximately 78 VdB (0.0083 in/sec PPV) at 40 feet from the rail centerline, the distance from the rail's centerline to the nearest Project boundary. Due to the close proximity to the Covina Station, the calculation accounted for the trains traveling at a slower speed which would reduce the vibration levels. Therefore, groundborne vibration levels would be below the FTA impact criteria. Additionally, the vibration would not cause damage to any new or existing structures along the rail corridor as the vibration of 0.0083 in/sec PPV is below Caltrans vibration threshold of in/sec PPV for extremely fragile buildings.

Aircraft Noise. The proposed Project is not located within an airport land use plan and is not located within two miles of a private or public use airport. The nearest airport is Brackett Field, located approximately 5.2 miles east of the Project site. Therefore, the proposed Project would not result in impacts related to airport-related noise.

Ground-borne Vibration. Ground-borne vibration can be generated from construction activities such as blasting, pile driving, and operating heavy earthmoving equipment. Construction of the proposed Project would involve grading, site preparation, and construction activities but would not involve the use of construction equipment that would result in substantial ground-borne vibration or ground-borne noise on properties adjacent to the Project site. No pile driving or blasting are proposed, and the site is relatively level, so substantial grading activities are not required. As discussed in the Noise Assessment, at the adjacent single-family residences, a large bulldozer would yield a worst-case 0.0315 peak particle velocity (in/sec), which is below any risk of damage and likely imperceptible. Thus, construction of the Project would not generate significant effects relating to construction vibration. In addition, operation of the recreational uses and offices does not include any activities or equipment that would generate substantial ground-borne noise and vibration. Therefore, the Project would not result in the exposure of persons to or generation of excessive ground-borne noise and vibration.

Overall, the proposed recreational facility would not result in any significant effects relating to noise or vibration; therefore, the proposed Project meets the noise related criteria of CEQA Guidelines Section 15332(d).

Noise Project Design Features

PDF N-1: A Plexiglas or glass barrier with a minimum height of 6-feet and approximately 8 dBA of sound attenuation shall be included extending from the eastern edge of the western building property line with the railroad to the western property line. The glass barrier shall be included from the southwestern property corner and proceed approximately 10 feet along the western property line.

AIR QUALITY

Applicable TCSP EIR Mitigation Measures

The following mitigation measures were included in the TCSP FEIR and are required to be implemented by projects within the TCSP Area to reduce impacts related to noise and vibration within implementing projects:

Mitigation Measure AIR-2A: Residential Electric Vehicle and Bicycle Parking Requirements
The following Residential and Non-Residential Voluntary Measures from the CalGreen Code (Appendix A4) shall apply to new residential (or residential mixed use) development projects located in the Covina Town Center Specific Plan:

- New one and two-family dwellings and townhomes shall include electric vehicle infrastructure consistent with Section A4.106.8.1 of the CalGreen Code.
- New multi-family dwellings with 17 or more units shall provide electric vehicle charging spaces capable of supporting electric vehicle supply equipment pursuant to Section A4.106.8.2.
- New multi-family dwelling units shall provide bicycle parking pursuant to Section A4.106.9.2.

Mitigation Measure AIR-2B: Non-Residential Electric Vehicle and Bicycle Parking Requirements
The following Non-Residential Voluntary Measures from the CalGreen Code (Appendix A5) shall apply to new non-residential (or mixed use) development projects located in the Covina Town Center Specific Plan:

- New non-residential development with more than 10 tenant-occupants shall provide changing/shower facilities for tenant-occupants in accordance with Table A5.106.4.3 of the CalGreen code.
- New non-residential development shall provide designated parking for any combination of low-emitting, fuel-efficient, and carpool/van pool vehicles pursuant to the Tier 1 requirements of Table A5.106.5.1.1 of the CalGreen code. Such parking spaces shall be marked pursuant to Section A5.106.5.1.3 of the CalGreen code.
- New non-residential development shall provide electric vehicle charging spaces capable of supporting electric vehicle supply equipment pursuant to the Tier 1 requirements of Section A5.106.5.3.1 of the CalGreen code. Such spaces shall be marked pursuant to Section A5.106.5.3.3 of the CalGreen code.

Mitigation Measure AIR-2C: Non-Residential Travel Demand Management
The following travel demand management provisions shall apply to new non-residential development in the Specific Plan area:

- New commercial and industrial projects greater than 25,000 square feet in size shall incorporate travel demand management TDM strategies that achieve a 10% reduction in trip generation rates below the standard rate published in the latest Institute of Transportation Engineers (ITE) Trip Generation Manual (10th edition), or other reputable source. This trip reduction level may be achieved through site design, transit, bicycle, shuttle, parking restriction, carpooling, or other TDM measures. All TDM plans shall have a designated coordinator who will track the effectiveness of the TDM Program over time.
- New commercial and industrial projects that employ 250 or more employees at a work site, on a full or part-time basis, shall implement an Employee Commute Reduction Program pursuant to South Coast Air Quality Management District Rule 2202, OnRoad Motor Vehicle Mitigation Option.

Air Quality Management Plan. The Project site is located in the South Coast Air Basin (SCAB), which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD

and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB. In preparation of the AQMP, SCAQMD and SCAG use land use designations contained in General Plan documents to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a project's density is consistent with the General Plan, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

As discussed previously, the proposed Project would be consistent with the existing TCSP and zoning designations. Furthermore, as discussed below, the project would not result in emissions that exceed SCAQMD thresholds and, as such, would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. As a result, the proposed project would also be consistent with the assumptions in the AQMP and would not conflict with SCAQMD's attainment plans.

Construction Emissions. Construction activities associated with the proposed Project would generate pollutant emissions from the following: (1) site preparation, grading, and excavation; (2) construction workers traveling to and from project site; (3) delivery and hauling of construction supplies to, and debris from, the project site; (4) fuel combustion by onsite construction equipment; (5) building construction; application of architectural coatings; and paving. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling.

Construction emissions associated with the proposed Project were modeled using CalEEMod, as further discussed in the CalEEMod Emission Summary, included herein as Appendix C. As discussed in the CalEEMod Emission Summary, the CalEEMod model generates an estimate of construction emissions based on a default set of construction activities (demolition, site preparation, grading, building construction, paving, and architectural coating), the length in time of each activity, and an associated inventory of construction equipment for each activity. The estimate of the Project's construction emissions applied the CalEEMod default assumptions. However, the use of the default assumptions results in an over-estimate of the Project's construction emissions. As noted above, the Project demolition is expected to be minimal; however, the model lists several large pieces of construction equipment to carry out the demolition. Further, the model assumes that the site preparation and grading activities will affect the entire site when only a small portion of the Project would be prepared and graded (only the non-building area). The model also assumes that new buildings would be constructed for the offices, indoor sports recreation complex, library, and fitness center. However, the Project proposes to renovate the existing buildings to accommodate the new uses and not construct new buildings. Nonetheless, the default CalEEMod construction schedule and construction equipment inventory were used to conservatively estimate the Project's construction emissions. As shown in Table 7 the construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds.

Table 7: Regional Construction Emissions Estimates

Construction Activity	Maximum Daily Regional Emissions[1] (pounds/day)					
	ROG	NO_X	C0	SO_x	PM_{10}	$PM_{2.5}$
2022						
Demolition	2.7	25.7	21.2	<0.1	1.4	1.2
Site Preparation	3.3	33.1	20.4	<0.1	9.5	5.5
Grading	3.7	38.9	29.8	0.1	5.4	3.0
Building Construction	1.8	16.1	27.5	<0.1	1.1	0.9
Maximum Daily Emission	3.7	38.9	29.8	0.1	9.5	5.5
2023						
Building Construction	1.7	14.8	17.2	<0.1	1.1	0.8
Paving	1.0	10.2	15.1	<0.1	0.7	0.5
Architectural Coating	19.2	1.3	2.0	<0.1	0.2	0.1
Maximum Daily Emission	19.2	14.8	17.2	<0.1	1.1	0.8
2022 to 2023 Maximum Daily Emissions	**19.2**	**38.9**	**29.8**	**0.1**	**9.5**	**5.5**
SCAQMD Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Emissions Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
ROG = reactive organic gases NOx = oxides of nitrogen PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter CO = carbon monoxide SO_x = sulfur oxides
PM emissions reflect SCAQMD Rule 403 reductions
Source: CalEEMod Emission Summary (Appendix C)

Therefore, construction activities would result in a less than significant impact.

Operational Emissions. Implementation of the proposed recreational facilities and office space would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. However, operational vehicular emissions, would generate the majority of emissions generated from the Project.

Operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table 8. As shown, the proposed Project would result in long-term regional emissions of the criteria pollutants that would be below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not result in a significant effect related to regional emissions.

Table 8: Regional Operational Emission Estimates

Operational Activity	Maximum Daily Regional Emissions (pounds/day)				
	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
Area	0.9	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	0.2	0.2	<0.1	<0.1
Mobile	4.4	4.4	40.1	8.5	2.3

Total Operational Emissions	**5.4**	**4.6**	**40.3**	**8.5**	**2.3**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**

NOx = oxides of nitrogen PM_{10} = particulate matter 10 microns or less in diameter ROG = reactive organic gases
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter CO = carbon monoxide
Source: CalEEMod Emission Summary, Appendix C

Local Emissions. In addition, the SCAQMD recommends the evaluation of localized NO_x, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. The impacts were analyzed pursuant to the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2008). SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NO_x, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project site is located in SRA 9, East San Gabriel Valley.

As shown in Table 9, with implementation of SCAQMD Rule 403, the maximum daily construction emissions from the proposed Project would not exceed any of the applicable SCAQMD LST thresholds. Therefore, the Project's construction emissions would not result in a significant effect related to localized emissions.

Table 9: Localized Construction Emissions Summary (lbs/day)

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO_x	**CO**	**PM_{10}**	**$PM_{2.5}$**
2022				
Demolition	25.7	20.6	1.2	1.2
Site Preparation	33.1	19.7	9.3	5.4
Grading	38.8	29.0	5.2	2.9
Building Construction	16.1	17.5	0.8	0.8
Maximum Daily Emission	38.8	29.0	9.3	5.4
2023				
Building Construction	14.4	16.2	0.7	0.7
Paving	10.2	14.6	0.5	0.5
Architectural Coating	1.3	1.8	0.1	0.1
Maximum Daily Emission	14.4	16.2	0.7	0.7
2022 to 2023 Maximum Daily Emissions	**38.8**	**29.0**	**9.3**	**5.4**
SCAQMD Significance Thresholds	**178**	**1,473**	**12.0**	**7.0**
Emissions Exceed Thresholds?	**No**	**No**	**No**	**No**

NOx = oxides of nitrogen PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter CO = carbon monoxide
PM emissions reflect SCAQMD Rule 403 emission reductions
Source: CalEEMod Emission Summary, Appendix C

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and

idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, and thus, due to lack of stationary source emissions, would not have a significant impact.

Greenhouse Gas Emissions: The analysis methodologies from SCAQMD are used in evaluating potential impacts related to greenhouse gas (GHG) emissions from implementation of the proposed project. SCAQMD does not have approved thresholds; however, does have draft thresholds that provides a tiered approach to evaluate GHG impacts, which includes:

- Tier 1: determine whether or not the project qualifies for any applicable exemption under CEQA
- Tier 2: determine whether the project is consistent with a greenhouse gas reduction plan, which would mean that it does not have significant greenhouse gas emissions.
- Tier 3: determine if the project would be below screening values; if a project's GHG emissions are under one of the following screening thresholds, then the project is less than significant:
    - All land use types: 3,000 MTCO2e per year
    - Residential: 3,500 MTCO2e per year
    - Commercial: 1,400 MTCO2e per year
    - Mixed use: 3,000 MTCO2e per year

In addition, SCAQMD methodology for project's construction GHG emissions are to average them over 30-years and then add them to the project's operational emissions to determine if the project would exceed the screening values listed above.

Construction activities produce combustion emissions from various sources, such as site excavation, grading, utility engines, heavy-duty construction vehicles onsite, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. Exhaust emissions from onsite construction activities would vary daily as construction activity levels change.

In addition, operation of the proposed Project would result in area and indirect sources of operational GHG emissions primarily from vehicle trips, electricity and natural gas consumption, water transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the building would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source.

The estimated operational GHG emissions that would be generated from implementation of the proposed Project are shown in Table 10. Additionally, in accordance with SCAQMD recommendation, the Project's amortized construction related GHG emissions are added to the operational emissions estimate in order to determine the Project's total annual GHG emissions.

Table 10: Greenhouse Gas Emissions

Emission Source	Annual GHG Emissions[1] ($MTCO_2e$)
Area	<1
Energy	119
Mobile	1,392
Waste	5
Water	53
Total Project Operational Emissions	1,569
Total Project Construction Emissions	20
Total Project Construction and Operation Emissions	1,589

Significance Threshold	**3,000**
Project Exceeds Threshold?	**NO**
Note: (1) The CalEEMod model provides GHG estimates for three pollutants: carbon dioxide, methane, and nitrous oxide. Carbon dioxide contributes over 97 percent of the total GHG emissions. Source: CalEEMod Emission Summary, Appendix C	

As shown on Table 10, the Project would result in approximately 1,589 MTCO2e per year which would not exceed the screening threshold of 3,000 MTCO2e per year (Vince Mirabella, 2021). Therefore, GHG emissions from the Project would not result in a significant effect. Furthermore, the Project would comply with the California Title 24, California Energy Code, and the CALGreen Code, which would provide for efficient energy and water consumption. Therefore, the proposed Project would not result in a conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Overall, the proposed recreational facility and offices would not result in any significant effects relating to air quality or greenhouse gas emissions; therefore, the proposed Project meets the air quality related criteria of CEQA Guidelines Section 15332(d).

WATER QUALITY

The Project site is within the Los Angeles River watershed and under the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB), which sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act (CWA) to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). Water quality standards for all ground and surface waters overseen by the Los Angeles RWQCB are documented in its Basin Plan, and the regulatory program of the Los Angeles RWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Construction. Construction of the proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would use heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff could wash into and pollute waters.

These types of water quality impacts during construction of the Project would be prevented through implementation of a stormwater pollution prevention plant (SWPPP). Construction of the Project would disturb more than one acre of soil; therefore, the proposed Project would be required to obtain coverage under the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. The Construction General Permit requires implementation of a SWPPP that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would generally contain a site map showing the construction perimeter, proposed buildings, stormwater collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. The SWPPP would also include construction Best Management Practices (BMPs) such as:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;

- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process would ensure that the Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operations. The proposed Project would operate a recreational facility and offices on the Project site, which would introduce the potential for pollutants such as, chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. The proposed Project area runoff will be directed to an onsite underground infiltration system that would be located on the northwestern corner of the site. Once the design capture volume is reached, the system would then begin to discharge to the storm drain in N. Citrus Avenue. However, in accordance with RWQCB Order No. R8-2010-0036 and the City's Municipal Code, the proposed project would be required to incorporate a Water Quality Management Plan (WQMP) with post-construction (or permanent) site design, source control, and treatment control BMPs.

A Preliminary WQMP will be prepared for the Project and include source control and treatment control BMPs and site design. The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs that would treat stormwater runoff. The proposed Project would install an onsite system to treat stormwater, which remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides). The site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.

With implementation of the operational source and treatment control BMPs that will be outlined in the Preliminary WQMP and required by the City during the project permitting and approval process, potential pollutants would be reduced to the maximum extent feasible. Plans for grading, drainage, erosion control and water quality would be reviewed by the City's Engineering Department prior to issuance of grading permits to ensure that the applicable and required LID BMPs are constructed during implementation of the Project. Adherence to the existing requirements would ensure that activities associated with operation of the proposed Project would not result in any significant effects relating to water quality.

Overall, the proposed recreational facility would not result in any significant effects relating to water quality; therefore, the proposed Project meets the water quality related criteria of CEQA Guidelines Section 15332(d).

e. Criterion Section 15332(e): Utilities: The site can be adequately served by all required utilities and public services.

The utilities necessary to construct and operate the proposed Project (electric, natural gas, trash, water, and sewage) would be adequately provided by existing utility service systems. The Project site is located in an urbanized and developed area. The proposed Project would connect to existing utility service lines within the Project site. Trash collection services would be arranged prior to the issuance of building permits. All

service confirmations would be addressed prior to occupancy. School public services will not be impacted by the Project since it is a recreational facility with no residential uses. Given the Project size and its location within an area that is currently served by utilities, the site can be adequately served by all required utilities and public services. Therefore, the proposed Project meets the criteria of CEQA Guidelines Section 15332(e).

5.2 EXCEPTIONS FOR EXEMPTIONS

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exceptions to qualifying for the Class 32 categorical exemption for an Infill Project are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

a. Criterion 15300.2(a): Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project does not qualify for an exemption under Classes 3, 4, 5, 6 or 11. The Project is located within an urban developed area and is not located within a sensitive environment. In addition, the Project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under criterion 15300.2(a) is not applicable.

b. Criterion 15300.2(b): Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The effects of the proposed Project would generally be beneficial, as the proposed Project would create a space for recreation in the City of Covina on an underutilized parcel of land. The proposed Project would develop a vacant packinghouse facility that is surrounded by industrial and residential uses and is already served by utilities and public services, as well as transportation. Any construction effects would be temporary, confined to the Project vicinity, and reduced to a less than significant level by implementing existing applicable regulatory requirements. No successive projects of the same type in the same place are known or expected to occur over time that would result in cumulatively considerable impacts. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the Project.

c. Criterion 15300.2(c): Significant Effects: A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no known unusual circumstances that are applicable to the Project, and which may result in a significant effect on the environment. The proposed Project consists of the adaptive reuse of two vacant warehouses for creation of recreational facilities and office space within a developed area that is served by utilities and transportation. The Project site would be consistent with the City's General Plan and the TCSP. The provision of a recreational space and office uses would not introduce a new activity to the area that could result in a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the Project.

d. Criterion 15300.2(d): Scenic Highways: A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The Project site is not located along an officially designated scenic highway corridor. The nearest officially designated state scenic highway, SR-2, is located more than 14 miles north of the proposed Project site in the San Gabriel Mountains and is not visible from the site. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project.

e. Criterion 15300.2(e): Hazardous Waste Sites: Hazardous Waste Sites: A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code.

The Project site currently consists of two vacant warehouses. The Project site is not listed on the State Water Resources Control Board's Geotracker or Department of Toxic Substance Control's Envirostor. As such, the site is not on any list pursuant to Section 65962.5 of the Government Code or any other list compiled for purposes related to identifying the prior release of hazardous materials. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

f. Criterion 15300.2(f): Historical Resources: A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resources.

The Project site is currently developed with two industrial warehouse buildings. The western building was constructed in 1988 and the eastern building was constructed by 1964, and therefore, are of historic age. As such, a historical resource assessment was conducted and is included herein as Appendix F. The historical resource assessment determined that the property is not eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or for local designation under Covina Municipal Code Chapter 17.81. Therefore, the Project would not destroy, demolish, or alter known historic resources. All construction would be confined to the Project site. Project construction would not impair the significance of any historic structures. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

On the basis of the evidence provided above, the Project is eligible for a Class 32 Categorical Exemption in accordance with Section 15332, Infill Development Projects, of the CEQA Guidelines. Because the proposed Project meets the criteria for categorically exempt infill development projects listed in CEQA Guidelines Section 15332 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the Project.

5 REFERENCES

Converse Consultants. "Asbestos and Lead-Base Paint Survey Report." October 21, 2021. Appendix D.

EPD Solutions. "Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis." December 22, 2021. Appendix A.

LDN Consulting, Inc. "Noise Assessment." December 9, 2021. Appendix B.

Mermilliod, Jennifer. "Cultural Resources Survey for the Recreation Village Project, Covina, Los Angeles County, California." December 20, 2021. Appendix E.

MIG. "Covina Town Center Draft Environmental Impact Report." 19 August 2019. https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/7231/covina_town_center_sp_deir_no_appendices.pdf

MIG. "Covina Town Center Specific Plan." 17 October 2019. https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/7231/covina_town_center_specific_plan_all_chapters_merged.pdf

Vince Mirabella. "CalEEMod Emission Summary." December 11, 2021. Appendix C.