California Environmental Quality Act
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Avid Hotel Project

Lead Agency:

City of Covina
125 E. College Street
Covina, CA 91723
(626) 384-5450
Contact: Mercenia Lugo

Prepared by:

Michael Baker INTERNATIONAL

3760 Kilroy Airport Way, Suite 270
Long Beach, CA 90806
Office: (562) 200-7165

JULY 2023

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

APPENDICES

1. INTRODUCTION

1.1. Project Overview

The proposed Avid Hotel Project (Project) includes construction of a three-story hotel building with 68 rooms on a 36,732-square-foot (0.84-acre) site in the western end of the City of Covina. The Project would provide 55 vehicle parking spaces on the ground level. To accommodate the Project, two existing commercial buildings would be demolished. Upon completion, the total floor area would be 30,200 square feet with a maximum height of 35 feet and a floor area ratio (FAR) of 0.82:1.

1.2. California Environmental Quality Act (CEQA) Process

CEQA (California Public Resources Code Section 21000 et seq.) was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

Section 15367 of the State CEQA Guidelines (14 California Code of Regulations 15000–15387) states that a CEQA Lead Agency is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, the City of Covina (City), as the Lead Agency, must complete an environmental review to determine if implementation of the proposed Project may result in significant adverse environmental impacts as defined under CEQA and to propose measures and/or alternatives, as feasible, to reduce or eliminate any such identified impacts. The City has prepared this Initial Study (IS) to help determine if the proposed Project could have the potential to cause significant adverse impacts. An IS is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the IS shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the IS identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment, a Mitigated Negative Declaration (MND) is appropriate. If the IS concludes that neither a Negative Declaration nor MND is appropriate, an EIR would be prepared. Based on the conclusions in this IS, the City determined that with implementation of mitigation, as agreed to by the applicant, the Project would not have a significant effect(s) on the environment and an MND is the appropriate level of CEQA documentation for the Project.

In compliance with the State CEQA Guidelines, the City, as Lead Agency, will provide opportunities for the public to participate in the environmental review process. An effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties. As set forth in Section

15072 of the CEQA Guidelines, the City will distribute a Notice of Intent to adopt an MND to the public, responsible agencies, trustee agencies, and the County Clerk to allow the public and agencies to review the proposed IS/MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for the IS/MND shall be not less than 20 days, or 30 days when a proposed IS/MND is submitted to the State Clearinghouse for review by state agencies.

1.3. Organization of the Initial Study

This IS is organized into sections as follows:

1. INTRODUCTION

    Introduces the Project, describes the purpose and content of the IS, and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

    Provides Project information, identifies key areas of environmental concern, and includes a determination of whether the Project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

    Describes the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4. ENVIRONMENTAL IMPACT ANALYSIS

    Contains the completed IS Checklist and discussion of the environmental factors that would be potentially affected by the Project. This section also includes mitigation measures that will be implemented to reduce impacts to less than significant levels. In accordance with Public Resources Code Section 21064.5 and CEQA Guidelines Sections 15064(f)(2) and 15070, the mitigation measures contained in Section 4 have been agreed to by the applicant.

2. EXECUTIVE SUMMARY

Project Title	Avid Hotel Project
Project Location	578 N. Azusa Avenue (Assessor Parcel Numbers 8432-006-015 and 8432-006-017)
Lead Agency	City of Covina
City Department	Community Development
Staff Contact	Mercenia Lugo, Planning Manager
Address	125 E. College Street, Covina, CA 91723
Phone Number	(626) 384-5450
Email	MLugo@covinaca.gov
Applicant	Raj Patel
Address	6789 Quail Hill Parkway, No. 731, Irvine, CA 92603
Phone Number	(949) 287-2003

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

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) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Potentially Significant Unless 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.

5) Earlier analysis 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). Earlier analyses are discussed in Section 19, at the end of the checklist, if utilized.

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the 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 on the project have been made or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find 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 earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature: _____ Date: 7/3/23

Printed Name: Mercenia Lugo For: City of Covina

Title: Planning Manager

3. PROJECT DESCRIPTION

3.1. Project Location and Setting

The Project would be located at 578 N. Azusa Avenue on Assessor Parcel Numbers 8432-006-015 and 8432-006-017 (Project Site) in the western end of the City of Covina. As shown in Figure 1, primary regional access to the Project Site is provided by State Route 39 (SR-39)/Azusa Avenue immediately west of the Project Site, Interstate 210 (I-210) freeway approximately 2 miles north of the Project Site, and I-10 freeway approximately 1.3 miles south of the Project Site. As shown in Figure 2, the Project Site is bounded by Azusa Avenue to the west, Glentana Street to the south, office buildings to the east, and surface parking and office/commercial buildings to the north.

Surrounding uses in the vicinity of the Project Site include restaurants and retail uses to the west across Azusa Avenue; restaurant, gas station, and residential uses to the south across Glentana Street; residential uses beyond the office and commercial uses to the east; animal hospital and automobile repair/industrial uses beyond the office and commercial buildings to the north and across Front Street; and a high school to the northwest at the intersection of Azusa Avenue and the Metrolink railway.

3.2. Existing Site Conditions

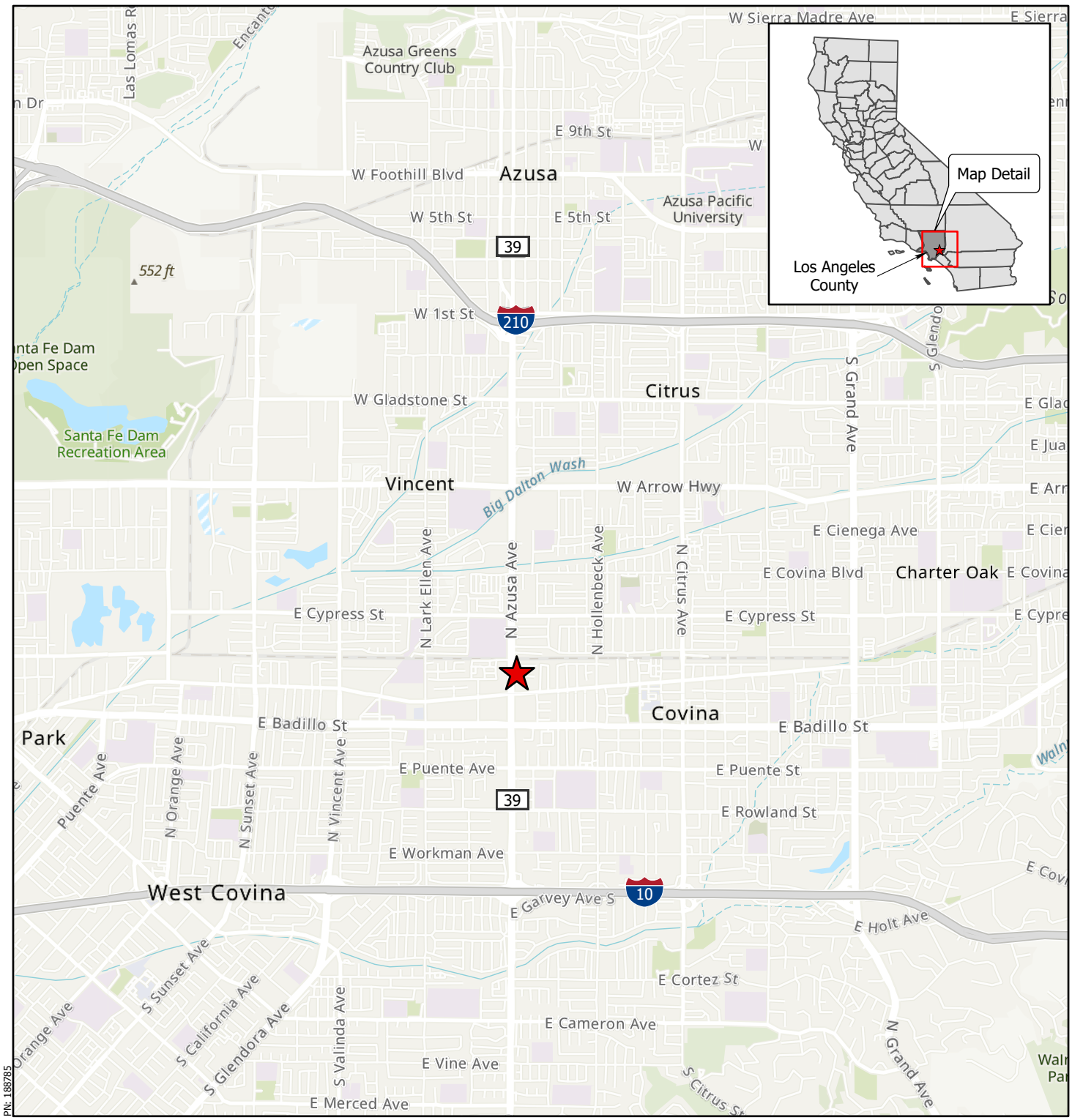
The Project Site is currently occupied by a single-story, 6,221-square-foot building and a single-story, 485-square-foot building with office/commercial uses. The existing buildings are located in the western portion of the Project Site, and include a surface parking area in the central portion of the site. The Project Site is then bisected by an alley that runs north–south and is accessible from Glentana Street. The alley then curves east and wraps the northern portion of an existing vacant and undeveloped lot, which is located in the eastern portion of the Project Site. The Project Site is located within a relatively level, fully urbanized area with a complete range of infrastructure elements (i.e., streets, sidewalks, streetlights, and wet and dry utilities).

The Project Site includes two ficus trees, one evergreen tree, and ornamental shrubs, all of which will be removed as part of the Project. Two evergreen pear trees that are located along the Azusa Avenue right-of-way will remain in place as part of the Project.

3.3. Land Use and Zoning

The Project Site is designated as General Commercial in the City's General Plan and is zoned C-3A Commercial Zone (Regional or Community Shopping Center).[1] Per Covina Municipal Code (CMC) Section 17.42.030, the C-3A zone permits hotel uses with a conditional use permit. CMC Section 17.62.027 specifies that such permitted hotel use shall meet specific standards such as those related to aesthetics/design, layout, setbacks, parking and circulation, landscaping, and amenities.

[1] City of Covina, General Plan Land Use Element, 2000, https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1073/land_use.pdf; City of Covina, Zoning Map, https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1071/zoning_wall.pdf, accessed March 17, 2023.



★ Project Location

Michael Baker INTERNATIONAL

N

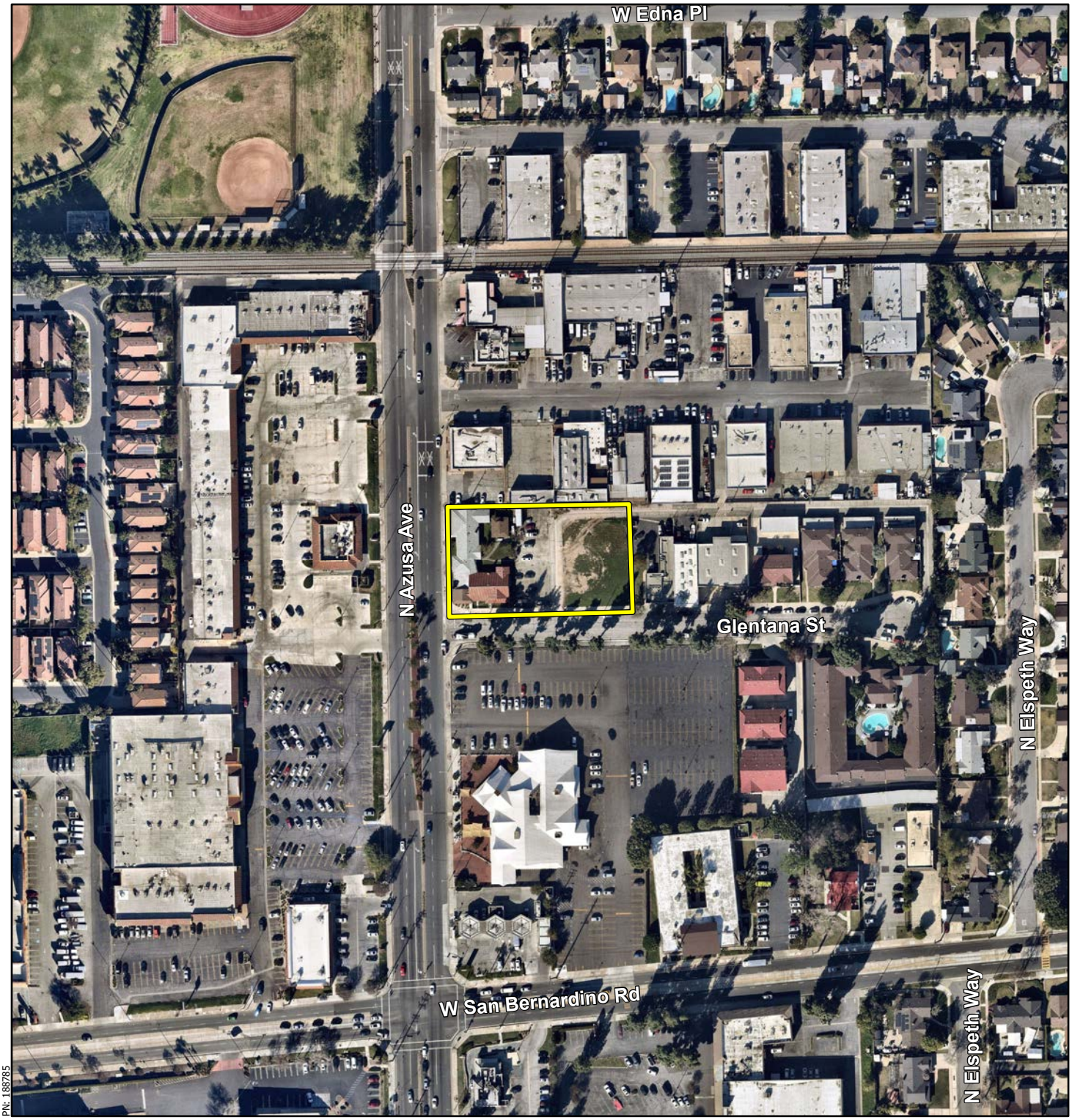
0 0.25 0.5 1 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Regional Location

Figure 1



Project Site

Michael Baker INTERNATIONAL

N

0 100 200 400 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Project Location

Figure 2

3.4. Project Description

3.4.1. Project Overview

The Project includes the development of a hotel consisting of 68 rooms and surface parking on a 36,732-square-foot site. A total of 30,200 square feet of floor area would be developed, resulting in a total FAR of 0.82:1. The proposed building would consist of three stories and a maximum height of 35 feet. As shown in Figure 3, all 55 of the proposed parking spaces would be located on the ground level.

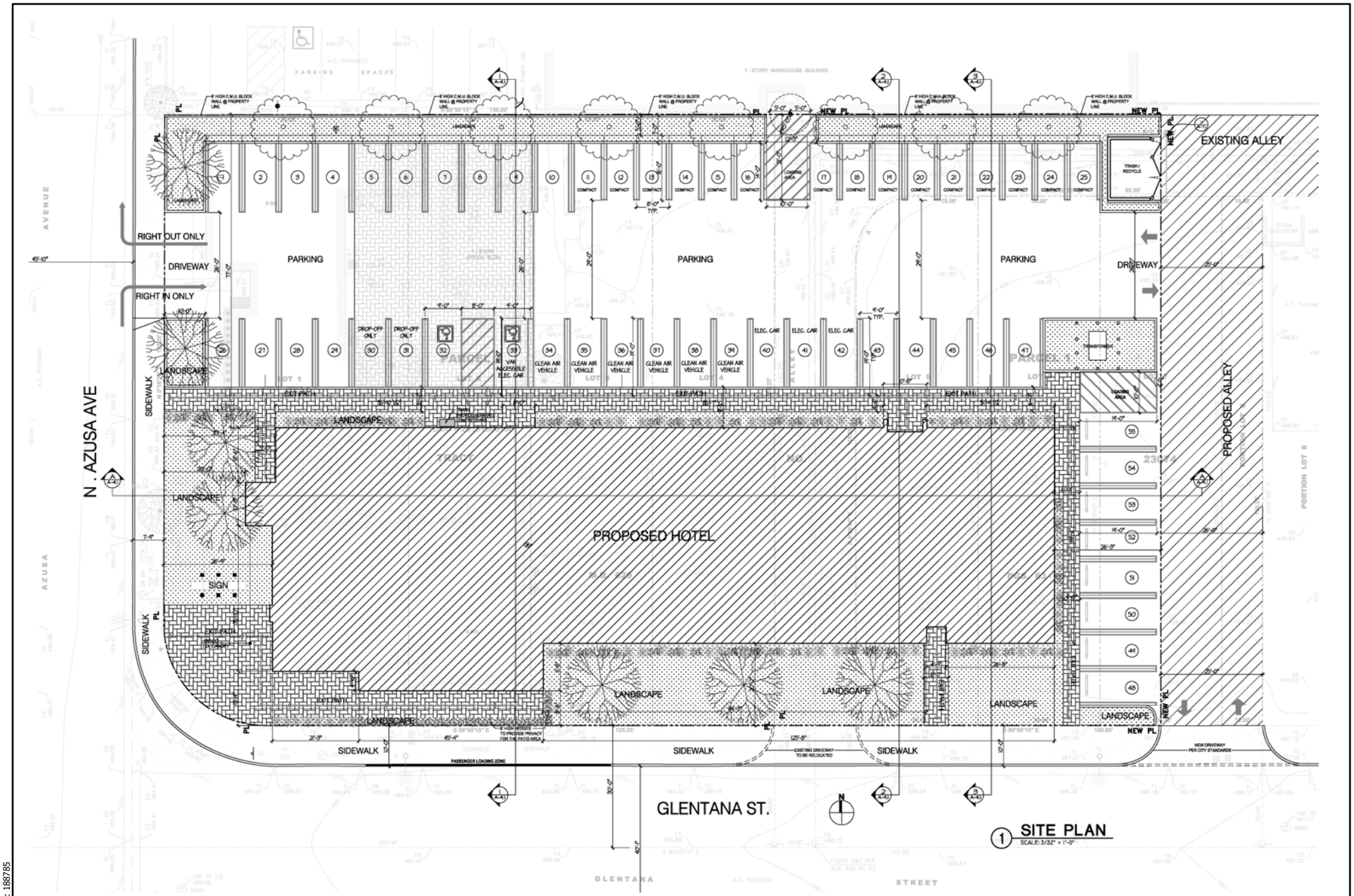
As shown in Figure 4, the ground floor of the hotel would consist of a hotel lobby, 14 hotel rooms, a fitness room, and a grab-and-go market area for hotel guests. The ground floor would also include staff office space, laundry facilities, a pantry, and storage space. In addition to the indoor seating area inside the lobby, the Project would provide a covered outdoor seating area facing Glentana Street. The second and third levels of the Project would consist of 27 hotel rooms each.

The proposed hotel building would be constructed in the southern portion of the Project Site, and surface parking would be located to the north and east. Specifically, 47 vehicle parking spaces would be located in the northern portion of the Project Site, and an aisle of 8 vehicle parking spaces and a loading area would be located just east of the building. The trash and recycling enclosure would be located in the northeastern portion of the Project Site. To accommodate the Project, the two existing one-story buildings on-site would be demolished, and the existing alley would be relocated along the easternmost portion of the Project Site.

3.4.2. Setbacks

Pursuant to CMC Section 17.42.030, hotel uses may be permitted on a site zoned as C-3A with a conditional use permit. CMC Section 17.62.027 provides specific setback provisions for such uses that abut or are adjacent to nonresidential-zoned properties. As such, the building would be required to have a setback of 25 feet in the front, 20 feet at the street-facing sides, and 25 feet at the rear. However, with the establishment of a Planned Community Development Overlay for the Project,[2] the following setbacks would be provided: 77 feet from the north; varying from 8 feet, 6 inches to 20 feet, 2 inches from the south; 33 feet from the east; and varying from 18 feet, 3 inches to 25 feet, 7 inches from the west.

[2] Pursuant to CMC Section 17.58.030, when a proposal for a new development is made and it is desirable to apply regulations more flexible than those applicable to other zones, a Planned Community Development district shall be established. Such districts may provide diversification in location of structure, uses, and other site qualities while ensuring compatibility with uses and future developments on the surrounding areas as indicated within the General Plan.



PN: 188785

Michael Baker INTERNATIONAL

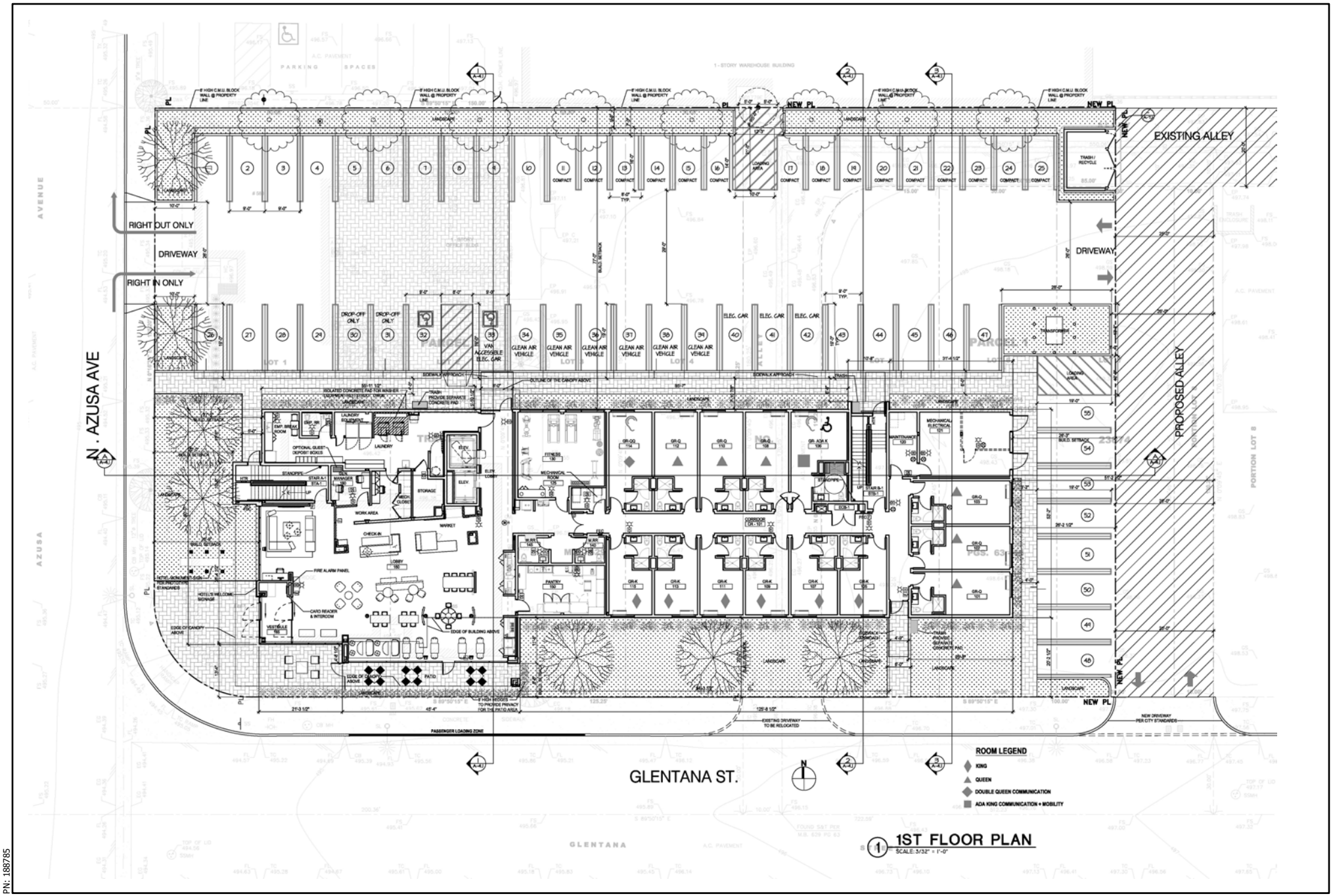
N

Source: Avid Hotel Project Plans 06/05/22; Alajajian Marcoosi Architects Inc. *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Conceptual Site Plan

Figure 3



PN: 188785

Michael Baker INTERNATIONAL

N

Source: Avid Hotel Project Plans 06/05/22; Alajajian Marcoosi Architects Inc. *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Site Plan - Level 1

Figure 4

3.4.3. Design and Landscaping

The Project would be designed consistent with other hotels of the IHG Hotels and Resorts' Avid hotel brand. As shown in Figures 5 and 6, the proposed hotel building would feature large hotel signage as well as a freestanding sign at the pedestrian level. The building would include tones of dark and light gray, red, and blue, as well as varying materials (i.e., metal and glass) to provide a modern façade. Lighting would be provided with the proposed signage and throughout the Project for aesthetic, security, and wayfinding purposes.

Pursuant to CMC Section 17.62.027, a hotel development within a C-3A zone would be subject to a conditional use permit and landscaping requirements. Per such requirements, a minimum 10 percent of the total site shall be landscaped. The Project would provide 6,329 square feet of landscaped area, or approximately 17.2 percent of the Project Site. As shown in Figure 7, areas surrounding the proposed building, driveways, and parking stalls would be landscaped with trees and shrubs.

3.4.4. Parking and Access

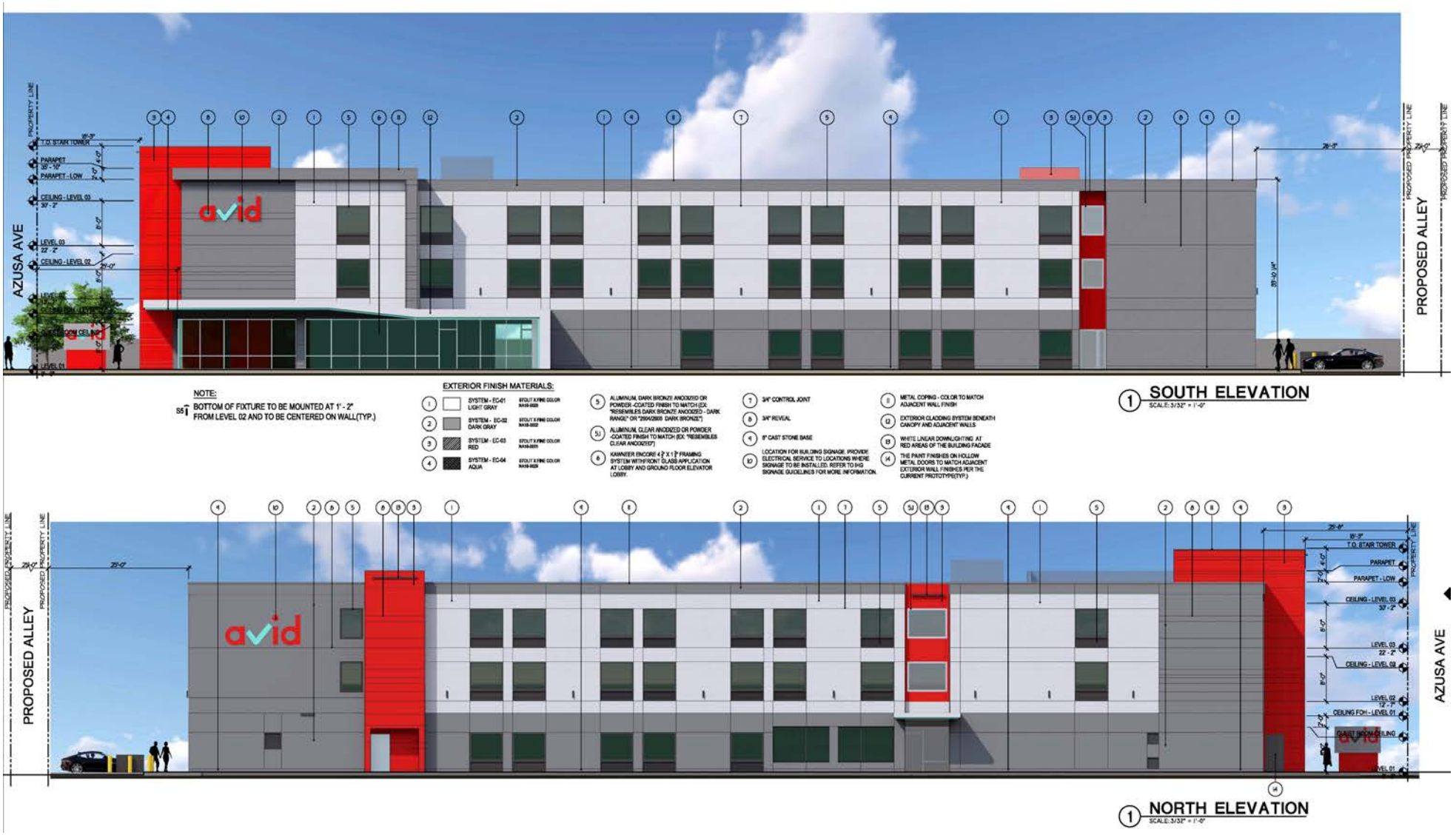
The Project would provide 55 vehicle parking spaces on the ground level, in the northern and eastern portions of the site, and would seek a variance for the 68 spaces required by the CMC. Of the 55 spaces, two would be Americans with Disabilities Act (ADA) compliant, four would be designated for electric vehicles, and six would be designated for clean air vehicles. In addition, although not required by the CMC, the Project would provide four bicycle parking spaces.

As shown in Figure 3, vehicular access would be available via a new driveway along Azusa Avenue that would allow right-turn ingress and egress. In addition, as discussed above, the Project would relocate an existing alley to the east within the Project Site. As such, full vehicular access would also be available via this relocated alley along Glentana Street. Furthermore, a 30-minute pickup/drop-off area would be located along a segment of Glentana Street near the street entrance of the proposed building within the southwestern portion of the Project Site.

Pedestrians would access the proposed building via an entrance at the southwest corner of the Project Site near the intersection of Azusa Avenue and Glentana Street. Additionally, pedestrians would be able to enter the proposed building from the surface parking area within the northwestern portion of Project Site. The proposed building includes a stairwell at its northwestern end that provides access between all three levels and exits onto the sidewalk along Azusa Avenue. Another stairwell at the northeastern end of the proposed building provides access between all three levels and exits to the parking lot.

3.4.5. Sustainability Features

The Project would comply with the 2022 California Green Building Standards Code, which was adopted by reference by the City of Covina per CMC Section 14.24.010, and would provide sustainability features such as energy efficient appliances and lighting, a solar-ready roof, electric vehicle charging stations, and low-flow water fixtures. The Project would comply with the City's Water Efficient Landscape Ordinance and would provide drought tolerant landscaping and water-efficient irrigation.



PN: 188785

Michael Baker INTERNATIONAL

N

Source: Avid Hotel Project Plans 06/05/22; Alajajian Marcoosi Architects Inc. *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Elevations - South and North

Figure 5

NOTE:

S5 BOTTOM OF FIXTURE TO BE MOUNTED AT 1' - 2" FROM LEVEL 02 AND TO BE CENTERED ON WALL(TYP.)

EXTERIOR FINISH MATERIALS:

1. SYSTEM - EC-01 LIGHT GRAY — STO/JT X FINE COLOR NA19-0028
2. SYSTEM - EC-02 DARK GRAY — STO/JT X FINE COLOR NA19-0032
3. SYSTEM - EC-03 RED — STO/JT X FINE COLOR NA19-0031
4. SYSTEM - EC-04 AQUA — STO/JT X FINE COLOR NA19-0026
5. ALUMINUM, DARK BRONZE ANODIZED OR POWDER -COATED FINISH TO MATCH (EX: "RESEMBLES DARK BRONZE ANODIZED - DARK RANGE" OR "2604/2605 DARK BRONZE")
5J. ALUMINUM, CLEAR ANODIZED OR POWDER -COATED FINISH TO MATCH (EX: "RESEMBLES CLEAR ANODIZED")
6. KAWNEER ENCORE 4 1/2" X 1 1/2" FRAMING SYSTEM WITHFRONT GLASS APPLICATION AT LOBBY AND GROUND FLOOR ELEVATOR LOBBY.
7. 3/4" CONTROL JOINT
8. 3/4" REVEAL
9. 6" CAST STONE BASE
10. LOCATION FOR BUILDING SIGNAGE. PROVIDE ELECTRICAL SERVICE TO LOCATIONS WHERE SIGNAGE TO BE INSTALLED. REFER TO IHG SIGNAGE GUIDELINES FOR MORE INFORMATION.
11. METAL COPING - COLOR TO MATCH ADJACENT WALL FINISH
12. EXTERIOR CLADDING SYSTEM BENEATH CANOPY AND ADJACENT WALLS
13. WHITE LINEAR DOWNLIGHTING AT RED AREAS OF THE BUILDING FACADE
14. THE PAINT FINISHES ON HOLLOW METAL DOORS TO MATCH ADJACENT EXTERIOR WALL FINISHES PER THE CURRENT PROTOTYPE(TYP.)

1 WEST ELEVATION
SCALE: 3/32" = 1'-0"

1 EAST ELEVATION
SCALE: 3/32" = 1'-0"

PN: 188785

Michael Baker INTERNATIONAL

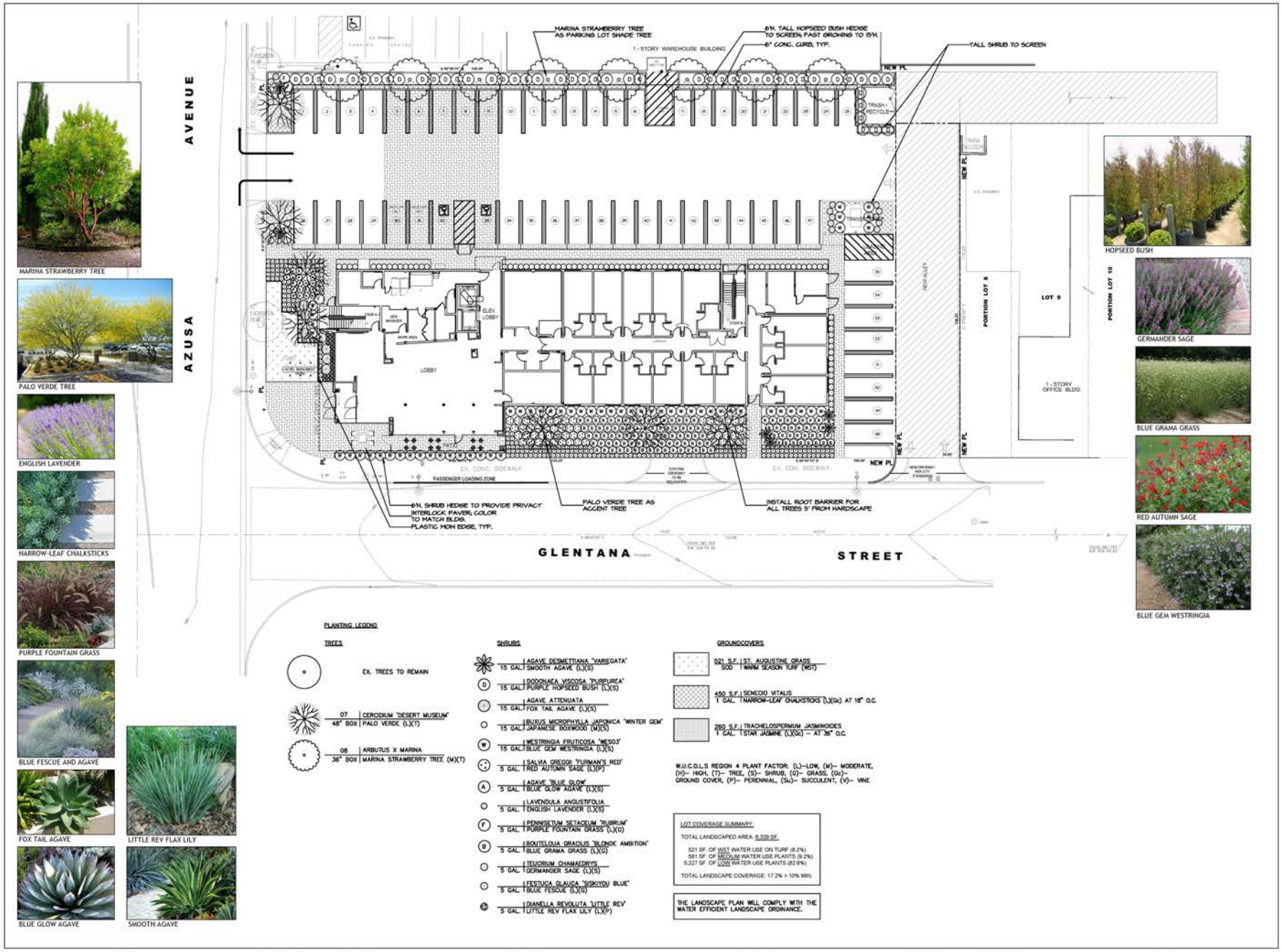
N

Source: Avid Hotel Project Plans 06/05/22; Alajajian Marcoosi Architects Inc. *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Elevations - West and East

Figure 6



PN: 188785

Michael Baker INTERNATIONAL

N

Source: Avid Hotel Project Plans 06/05/22; Alajajian Marcoosi Architects Inc. *Covina, California*

AVID HOTEL PROJECT
COVINA, CA

Landscaping Plan

Figure 7

3.5. Anticipated Construction Schedule

Construction of the Project would begin with site clearance and demolition of the existing buildings, followed by minimal grading to a depth of 5 to 6 feet below existing grade. In addition, the Project's drywell ground infiltration system would require excavation to a depth of up to 40 feet below grade in the northwestern portion of the Project Site. Building foundations would then be laid, followed by building construction, paving/concrete installation, and addition of landscaping. The Project would install new utility connections from existing public infrastructure to serve the Project. Project construction is anticipated to occur over a 11-month period and be completed in 2024.

3.6. Required Permits and Approvals

The City of Covina has the discretionary authority to approve the Project. A list of the required permits and approvals from the City for this Project include:

- Site Plan Review 21-109
- Conditional Use Permit 21-28
- Planned Community Development Overlay 21-2
- Tentative Parcel Map 21-4

4. ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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 area, 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?	☐	☐	☒	☐

Explanation of Checklist Responses

Pursuant to Senate Bill (SB) 743 (Public Resources Code [PRC] Section 21099[d]), "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan." PRC Section 21064.3 defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. PRC Section 21099 defines an infill site as a lot located within an "urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." The Project meets the definition of an "employment center project" based on the site's commercial zoning and proposed FAR of 0.82:1. The Project Site meets the definition of an "infill site" because the site is located in an urban area and has been previously developed. In

addition, according to the City's VMT Screening Tool, the Project is located in a TPA.[3] Therefore, the Project is considered an applicable project per SB 743. As such, the Project's aesthetic impacts are further evaluated below for informational purposes only.

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

No Impact. A scenic vista is generally considered a publicly accessible, prominent vantage point that provides expansive views of highly valued landscapes or prominent visual elements, as defined by local plans or policies. These may include panoramic views that are associated with an urban skyline, valley mountain range, the ocean, or other water bodies. As described in the General Plan, the City is located approximately 34 miles east of the Pacific Ocean, 23 miles east of downtown Los Angeles, and just north of the San Bernardino Freeway (I-10) within the San Gabriel Valley of Los Angeles County (Figure 1).[4] The City is generally flat, although there is a hilly enclave in the southeastern area. The Project Site is located in the western portion of the City in a predominantly urbanized area that includes a mix of commercial, residential, and light manufacturing/industrial uses. While the San Gabriel Mountains to the north are visible at the street level, the General Plan does not identify scenic vistas as defined above in the vicinity of the Project Site. There are also no unique cultural or topographic features that offer a distinctive and enhanced visual setting that is recognized for its scenic vista qualities. Furthermore, the Project's low-rise development with a height of 35 feet would be comparable to other low-rise development in the vicinity and would not adversely affect existing views of the vicinity or San Gabriel Mountains. Therefore, the Project would have no impact on a scenic vista.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site is not located along or within a designated state scenic highway.[5] The Project Site is located approximately 2.1 miles south of the segment of Azusa Avenue that has been designated as an eligible state scenic highway. Furthermore, the nearest officially designated state scenic highway is a segment of the Angeles Crest Highway (California Route 2), which is located approximately 15 miles north of the Project Site. As a result, the site is not visible from designated or eligible state scenic highways. The proposed Project would not require removal of, or impact views of, any scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway or a locally designated scenic highway. Therefore, the Project would have no impact to scenic resources within a state scenic highway.

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

Less Than Significant Impact. As previously mentioned, the Project Site is located within an urbanized area with a variety of uses such as commercial, residential, and light

---

3 Refer to the Avid Hotel Technical Memorandum included as **Appendix G** of this IS/MND.
4 City of Covina, General Plan, 2000.
5 California Department of Transportation, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed March 30, 2022.

manufacturing/industrial land uses. The proposed hotel use would be consistent with the property's C-3A Commercial Zone (Regional or Community Shopping Center) zoning classification with a conditional use permit. Pursuant to CMC Section 17.62.027, the Project would also comply with the specific hotel standards such as those related to aesthetics/design, layout, setbacks, parking and circulation, landscaping, and amenities. Therefore, Project would result in less-than-significant impact involving conflicts with zoning standards.

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

Less Than Significant Impact. The two primary sources of light introduced by a project include those emanating from building interiors that pass through windows, and light from exterior sources, such as street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting. Depending on the location of the light source and its proximity to adjacent light-sensitive uses, light introduction may become a nuisance, affecting adjacent areas and diminishing the view of the clear night sky. Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties.

The Project would involve the use of interior lighting that is typical of hotel uses. The lobby would have large glass windows and doors, while the hotel rooms would have smaller windows. The lighting may be visible for surrounding areas during the nighttime; however, the internal lighting would not be directly outward from the buildings and would not be considered new sources of substantial light.

The Project's stand-alone hotel sign near Azusa Avenue and the sign on the building would be illuminated in accordance with CMC Section 17.74 for signs in commercial zones. Accordingly, the signs would not obstruct the sight distance of motorists or pedestrians or be designed with flashing lights, moving parts, audible noises, or other devices which tend to constitute a hazard. All lighted signs would have diffused or indirect lighting and be subject to review by the City's planning department.

Security and safety lighting at entry areas, exit doors, outdoor patio areas, parking, and perimeter would be hooded so as not to shine on abutting properties. Such lighting would be shielded, low lumen downlighting, and would conform to the CMC standards and be assessed during the Project's site plan reviewing for safety and security. As a result, no light from the Project is expected to spill onto adjacent properties or be a substantial source of light from off-site locations.

Glare and glint refer to the unwanted reflection of the sun's rays or other forms of light by the face of a reflective surface. Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles. However, the proposed layout of the Project Site would prevent glare from causing significant impacts. Landscaping surrounding the building would reduce sources of glare from the glass surfaces of the building and surfaces of parked cars. The building's glass coating materials would be selected to achieve as much transparency with low reflectivity as possible. In addition, while headlights from vehicles entering and exiting the Project's driveways would be visible to vehicles in the right-of-way, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact. Therefore, the Project would result in a less than significant impact related to light and glare.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. ***Would the project:***	**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 nonagricultural 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 nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Explanation of Checklist Responses

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. Based on the Farmland Mapping and Monitoring Program (FMMP), the Project Site is identified as Urban and Built-Up Land, which is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, and is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, and other developed purposes.[6] The Project would not be located on or near Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no agricultural uses or operations occur on-site or within the vicinity of the Project Site. Therefore, the Project would not convert Farmland to a non-agricultural use, and no impact would occur.

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

No Impact. The Project Site is zoned C-3A Commercial Zone (Regional or Community Shopping Center), which does not permit agricultural uses, and no agricultural uses currently exist on-site. In addition, the Project Site is not part of a Williamson Act contract or any other sort of deed or land use restriction intended to preserve or foster agricultural uses. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. As noted above, the Project Site is zoned C-3A, which is intended to provide for the development of commercial projects, as stated in CMC Section 17.42.030, and is not developed as forestland or timberland. All surrounding land is fully developed with commercial, residential, and light manufacturing/industrial uses. Therefore, the Project would not conflict with existing zoning for forest or timberland or cause rezoning of forest or timberland, and no impact would occur.

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

No Impact. As described in Checklist Question II.c, the Project Site is developed with commercial uses and does not contain any forest land. Therefore, the Project would not result in the conversion of forestland to non-forest use, and no impact would occur.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?

No Impact. The Project would be located within a fully urbanized area on a site that is currently developed with two commercial buildings and vacant land. There are no areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on or near the Project Site, and no forest lands exist within the vicinity of the project site. Therefore, the Project would not involve changes in the existing environment that could result in conversion of Farmland to nonagricultural use or the conversion of forest land to non-forest use. Therefore, no impact would occur.

---

[6] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed April 1, 2022.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. 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?	☐	☐	☒	☐

Explanation of Checklist Responses

The following analysis is based in part on the information contained in the *Air Quality/Greenhouse Gas Emissions/Energy Data* report prepared for the Project by Michael Baker International, which is included as **Appendix A** of this IS/MND.

Regulatory Framework

The South Coast Air Quality Management District (SCAQMD) provides guidance to lead agencies on how to evaluate project air quality impacts related to the following criteria: (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan.

The SCAQMD's *South Coast AQMD Air Quality Significance Thresholds* provides regional air quality significance thresholds for both construction and operation of projects within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result.[7] If a project generates emissions in excess of the established mass daily emissions thresholds, a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of impacts. Table III-1, *SCAQMD Regional Air Quality Significance Thresholds*, summarizes SCAQMD's regional thresholds.

[7] It is acknowledged that although these thresholds developed by the SCAQMD are available, ultimately, it is the Lead Agency under CEQA who determines the thresholds of significance for impacts.

Table III-1
SCAQMD Regional Air Quality Significance Thresholds

Air Pollutant[1]	Mass Daily Emission Threshold (lb/day)	
	Construction	Operation
NO_X	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550

Key: SCAQMD = South Coast Air Quality Management District; lb/day = pounds per day; NO_X = oxides of nitrogen; VOC = volatile organic compounds; PM_{10} = directly emitted particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = directly emitted particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; SO_X = oxides of sulfur; CO = carbon monoxide.

Notes:
1. SCAQMD also provides mass daily emission thresholds for lead of 3 lb/day for both construction and operation. However, lead is not a pollutant of concern in this study because the proposed Project would not produce substantial lead emissions.

Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds,* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, April 2019.

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

Less Than Significant Impact. The City is located within the South Coast Air Basin (SCAB), which has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as non-attainment areas. The SCAB is governed by the SCAQMD and, pursuant to the federal Clean Air Act, the SCAQMD is required to reduce emissions of the air pollutants for which the SCAB is in non-attainment.

On December 2, 2022, the SCAQMD Governing Board adopted the *2022 Air Quality Management Plan* (2022 AQMP). The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions and updated emission inventory methodologies for various source categories. Additionally, the 2022 AQMP utilized information and data from the Southern California Association of Government (SCAG) and its *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). The SCAQMD considers projects that are consistent with the 2022 AQMP, which is intended to bring the Basin into attainment for all criteria pollutants, to also have less than significant cumulative impacts. According to the SCAQMD CEQA *Air Quality Handbook*, in order to determine consistency with 2022 AQMP, two main criteria must be addressed:

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) *Would the project result in an increase in the frequency or severity of existing air quality violations?*

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency.

As discussed below in Checklist Questions III.b and III.c, the Project's short-term construction emissions, long-term operational emissions, and localized concentrations of carbon monoxide (CO), nitrogen oxides (NO_X), and particulate matter (PM_{10} and $PM_{2.5}$) would result in less than significant impacts during Project construction and operations. Therefore, the Project would not result in an increase in the frequency or severity of existing air quality violations. Further, because reactive organic gasses (ROGs) are not a criteria pollutant, there is no ambient standard or localized threshold for ROGs. Due to the role ROGs play in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. It is noted that emissions of ROGs as a result of the Project would not exceed the regional emissions threshold (refer to Checklist Question III.b, below).

b) *Would the project cause or contribute to new air quality violations?*

As discussed below in Checklist Questions III.b and III.c, the Project would result in emissions below the SCAQMD thresholds for regional and localized emissions. Therefore, the proposed Project would not have the potential to cause or contribute to a violation of the ambient air quality standards.

c) *Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

As discussed in Checklist Question III.c, the Project would result in less than significant impacts with regards to localized concentrations during construction and operations. As such, the proposed Project would not delay the timely attainment of air quality standards or 2022 AQMP interim emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the SCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed Project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Determining whether or not a project exceeds these assumptions involves the evaluation of the three criteria outlined below. The following discussion analyzes each of these criteria.

a) *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

A project is consistent with the 2022 AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2022 AQMP. In the case of the 2022 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the City's General Plan, SCAG's regional growth forecast, and the SCAG's 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The Project includes the construction of a hotel development consisting of 68 rooms with 30,200 square feet of floor area and a surface parking lot on a 36,732-square-foot site, which translates to a FAR of 0.82:1. The Project Site is zoned as C-3A Commercial Zone (Regional or Community Shopping Center). Per CMC Section 17.42.030, the C-3A zone permits hotel uses with a conditional use permit. CMC Section 17.62.027 specifies that the permitted hotel use shall meet specific standards such as those related to aesthetics/design, layout, setbacks, parking and circulation, landscaping, and amenities. As demonstrated throughout this IS/MND, the Project would be designed to meet these stated specific standards. As such, the Project would not differ from the General Plan designations. Upon approval of the conditional use permit, the Project would be consistent with the General Plan and CMC, and would be consistent with the types, intensity, and patterns of land use envisioned for the vicinity.

As discussed under Checklist Question XIV.a, the Project would not induce substantial unplanned population growth in an area. The Project would provide short-term hotel stays for guests and would not provide long-term residences. Furthermore, as discussed below in Checklist Section XI, Land Use and Planning, the proposed hotel uses would be consistent with the permitted land uses on-site. The Project's 15 employment opportunities would be nominal and would likely be filled by individuals who already reside in the area. Therefore, the Project would not cause the City's General Plan buildout population forecast to be exceeded. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. Additionally, as the SCAQMD has incorporated these same projections into the 2022 AQMP, it can be concluded that the Project would be consistent with the projections. Therefore, the Project would meet this AQMP consistency criterion.

b) *Would the project implement all feasible air quality mitigation measures?*

The Project would result in less than significant air quality impacts and would comply with applicable SCAQMD rules and regulations, including Rule 403, which ensures excessive fugitive dust emissions are controlled by regular watering or other dust prevention measures, and Rule 1113, which regulates the ROG content of paint (refer to Checklist Questions III.b and III.c). Therefore, the Project would meet this AQMP consistency criterion.

c) *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

As discussed above, the Project would be consistent with the land use envisioned in the General Plan. The Project would not cause SCAG's population forecast to be exceeded and the population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City.

Additionally, the SCAQMD has incorporated these same projections into the 2022 AQMP. Land use planning strategies set forth in the 2022 AQMP are primarily based on the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the actions and strategies of the 2020-2045 RTP/SCS. Therefore, the Project would meet this AQMP consistency criterion.

In conclusion, the determination of 2022 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the SCAB. The Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. Also, the Project would be consistent with the goals and policies of the 2022 AQMP for control of fugitive dust (refer to Checklist Question III.b). As discussed above, the Project's long-term influence would also be consistent with the SCAQMD's and SCAG's goals and policies. Therefore, the Project would be considered consistent with the 2022 AQMP, and impacts would be less than significant.

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

Less Than Significant Impact.

Construction

The Project would involve short-term construction activities associated with demolition, grading, building construction, and architectural coating applications. The Project would be constructed over approximately 11 months. Exhaust emission factors for typical diesel-powered heavy equipment are based on the program defaults of the most recent version of the California Emissions Estimator Model (CalEEMod), version 2020.4.0. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared using CalEEMod. Refer to **Appendix A**, *Air Quality/Greenhouse Gas Emissions/Energy Data,* for the CalEEMod outputs and results. Table III-2, *Short-Term Construction Emissions*, presents the anticipated daily construction emissions.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways. Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from demolition, grading, and construction is expected to be short term and would cease upon Project completion. It should be noted that most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Table III-2
Construction Emissions

Construction Related Emissions[2]	Maximum Daily Emissions (pounds/day)[1]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Year 1 (2023)	3.18	31.51	24.24	0.06	6.09	2.87
Year 2 (2024)	14.89	14.51	16.99	0.03	1.00	0.69
Maximum Daily Emissions	**14.89**	**31.51**	**24.24**	**0.06**	**6.09**	**2.87**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	*No*	*No*	*No*	*No*	*No*	*No*

Notes:

1. Emissions were calculated using CalEEMod, version 2020.4.0. Winter emissions represent the worst-case scenario.
2. Modeling assumptions include compliance with SCAQMD Rule 403, *Fugitive Dust*, which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.

Source: Refer to **Appendix A**, *Air Quality/Greenhouse Gas Emissions/Energy Data*, of this IS/MND for detailed model input/output data.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. Sources of PM_{10} include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly produced by mechanical processes. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and sulfur oxides (SO_X) combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

Construction activities would comply with SCAQMD Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SCAQMD Rule 403 would greatly reduce PM_{10} and $PM_{2.5}$ concentrations. It should be noted that these reductions were applied in CalEEMod. As depicted in Table III-2, total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Thus, construction-related air quality impacts from fugitive dust emissions would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions (e.g., NO_X and CO) from construction activities include emissions associated with the transport of machinery and supplies to and from the Project Site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the site. As presented in Table III-2, construction equipment and worker vehicle exhaust emissions would

not exceed the established SCAQMD thresholds. Therefore, air quality impacts from equipment and vehicle exhaust emissions would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are ozone precursors. As required, all architectural coatings for the Project buildings would be required to comply with SCAQMD Rule 1113. Rule 1113 provides specifications on painting practices as well as regulating the ROG content of paint. With compliance with Rule 1113, ROG emissions associated with the Project would be less than significant (refer to Table III-2).

Total Daily Construction Emissions

In accordance with the SCAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As indicated in Table III-2, criteria pollutant emissions during construction of the Project would not exceed the SCAQMD significance thresholds. Therefore, total construction-related air emissions would be less than significant.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report,*[8] serpentinite and ultramafic rocks are not known to occur within the Project area. With regard to development of the Project, however, as discussed in response to Checklist Question IX.b, due to the age of the existing structures (built 1963-1964) to be demolished, hazardous materials such as asbestos-containing materials could potentially be released. In the event that asbestos-containing materials are found on-site during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with SCAQMD Rule 1403. With adherence to SCAQMD Rule 1403, impacts related to the release of asbestos would be less than significant.

[8] Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf.

Operational Emissions

Long-term air quality impacts associated with operations would consist of mobile source emissions generated from Project-related traffic, and emissions from stationary area and energy sources. The total operational emissions are shown in Table III-3, *Operational Air Emissions*, and discussed in more detail below. It should be noted that operational emissions shown in Table III-3 do not account for emissions from existing uses on-site in order to be more conservative.

Table III-3
Operational Air Emissions

Emissions Source	Maximum Daily Emissions (pounds/day)[1,2]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Proposed Project Winter Emissions						
Area Source[3]	0.69	<0.01	<0.01	0.00	<0.01	<0.01
Energy Source[4]	0.02	0.19	0.16	<0.01	0.01	0.01
Mobile	1.36	1.38	12.48	0.03	2.78	0.75
Total Emissions	***2.07***	***1.57***	***12.65***	***0.03***	***2.79***	***0.77***
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Proposed Project Summer Emissions						
Area Source[3]	0.69	<0.01	<0.01	0.00	<0.01	<0.01
Energy Source[4]	0.02	0.19	0.16	<0.01	0.01	0.01
Mobile	1.39	1.28	12.60	0.03	2.78	0.75
Total Emissions	***2.10***	***1.47***	***12.74***	***0.03***	***2.79***	***0.77***
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using CalEEMod, version 2020.4.0.
2. The numbers may be slightly off due to rounding.
3. Area source emissions account for the Project design feature that requires all electric landscape equipment.
4. Energy source emissions account for Project design features that use energy-efficient appliances and 100 percent electric landscaping equipment. Based on the information provided by the applicant, the Project would not consume natural gas on-site. However, to provide a conservative analysis, natural gas was modeled in the CalEEMod.

Source: Refer to **Appendix A**, *Air Quality/Greenhouse Gas Emissions/Energy Data*, of this IS/MND for detailed model input/output data.

Area Source Emissions

Area source emissions would be generated from consumer products, architectural coatings, and landscaping. The Project would utilize all-electric landscape equipment as a Project design feature, which has been incorporated into CalEEMod. As shown in Table III-3, area source emissions from the Project would not exceed SCAQMD thresholds for ROG, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Therefore, impacts from area source emissions would be less than significant.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the Project. Based on the information provided by the applicant,

the Project would not consume natural gas on-site. The primary use of electricity by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Criteria air pollutants from electricity use were not quantified since the emissions occur at the site of the power plant, which is off-site. As shown in Table III-3, the emissions associated with energy consumption would not exceed established SCAQMD thresholds. Therefore, impacts from energy source air emissions would be less than significant.

Mobile Source Emissions

Mobile source emissions are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form ozone [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$); however, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions were estimated using CalEEMod. Based on the *Avid Hotel –Technical Memorandum* (Transportation Memo), which is included as **Appendix G** of this IS/MND, the Project would generate 543 average daily vehicle trips on weekdays and 549 average daily vehicle trips on weekends (Saturday). As shown in Table III-3, emissions generated by vehicle traffic associated with the Project would not exceed established SCAQMD thresholds. Therefore, impacts from mobile source air emissions would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individuals [e.g., age, gender]). In particular, ozone precursors, ROGs and NO_X, affect air quality on a regional scale. Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating Project-generated criteria pollutants to specific health effects or additional days of non-attainment would produce meaningless results. In other words, the Project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD,[9] the SCAQMD acknowledged that it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District,[10] the district acknowledged that currently available modeling tools are

[9] South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

[10] San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from ozone, as an example, is correlated with the increases in the ambient level of ozone in the air (concentration) that an individual person breathes. The SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient ozone levels over the entire region. The SCAQMD states that based on its own modeling in the 2012 AQMP, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of volatile organic compounds (VOCs) would reduce ozone levels at the highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. As such, for the purpose of this analysis, since the Project would not exceed SCAQMD thresholds for construction and operational air emissions, it is anticipated that Project impacts related to air quality health would be less than significant.

Cumulative Impacts

With respect to the Project's air quality emissions and cumulative SCAB basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2022 AQMP pursuant to federal Clean Air Act mandates. As such, the Project would comply with SCAQMD Rule 403 requirements and the adopted 2022 AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted 2022 AQMP emissions control measures) would also be imposed on development projects throughout the SCAB, which would include related projects.

According to the *SCAQMD CEQA Air Quality Handbook*, project-related emissions that fall below the established construction and operational thresholds should be considered less than significant unless there is pertinent information to the contrary. As discussed previously, the proposed Project would not result in short- or long-term air quality impacts, as emissions would not exceed the SCAQMD adopted construction or operational thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. As a result, the proposed Project would not contribute a cumulatively considerable net increase of any non-attainment criteria pollutant. Therefore, the Project's incremental construction and operational emissions would not contribute to a cumulatively considerable air quality impact and impacts in this regard are less than significant.

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

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The closest sensitive receptor for the purpose of the Localized Significance Threshold (LST) analysis is a multifamily residence located approximately 180 feet east of the Project Site. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction and operations impacts (area sources only). The CO hotspot analysis, following the LST analysis, addresses localized mobile source impacts.

Localized Significance Thresholds

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance.[11] The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST screening lookup tables for 1-, 2-, and 5-acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The Project is located in source receptor area (SRA) 9 (East San Gabriel Valley).

Construction

The SCAQMD's guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day. Based on default information provided by CalEEMod, the Project is anticipated to disturb up to 5 acres during the grading phase. The grading phase would take approximately five days to complete. As such, the Project would actively disturb an average of approximately 1 acre per day (five acres divided by five days). Therefore, the LST threshold for 1 acre was utilized for the construction LST analysis. The nearest sensitive use is the multifamily residence located approximately 180 feet (54.8 meters) to the east of the Project Site. Therefore, the LSTs for 25 meters were conservatively adopted. Table III-4, *Localized Significance of Construction Emissions*, shows the localized construction-related emissions. It is noted that the localized emissions presented in Table III-4 are less than those in Table III-2 because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust). As seen in Table III-4, emissions would not exceed the LST mass rate screening thresholds for SRA 9. Therefore, construction LST impacts would be less than significant.

[11] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, July 2008.

Table III-4
Localized Significance of Construction Emissions

Maximum Emissions [1]	Maximum Daily Emissions (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Year 1[2]	14.47	14.21	3.23	1.82
Year 2[3]	12.82	14.10	0.54	0.52
Maximum Daily Emissions	***14.47***	***14.21***	***3.23***	***1.82***
Localized Significance Threshold Mass Rate Screening Criteria [4]	112	945	14	5
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Note:
1. Modeling assumptions include compliance with SCAQMD Rule 403, *Fugitive Dust*, which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.
2. Maximum on-site daily emissions occur during grading phase for NO_X, PM_{10}, and $PM_{2.5}$ and during the building construction phase for CO in Year 1.
3. Maximum on-site daily emissions occur during building construction phase for NO_X, CO, PM_{10}, and $PM_{2.5}$ in Year 2.
4. The LST Mass Rate Screening Criteria was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Mass Rate Screening Threshold was based on the anticipated daily acreage disturbance for construction (one acre), the distance to sensitive receptors (50 meters), and the source receptor area (SRA 9).

Source: Refer to **Appendix A**, *Air Quality/Greenhouse Gas Emissions/Energy Data*, of this IS/MND for detailed model input/output data.

Operations

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project included stationary sources or attracted mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Project would involve the construction of a hotel and would not introduce a new stationary source or attract mobile sources that may spend extended periods queuing and idling at the Project Site, nor would the Project include warehouses or transfer facilities. Therefore, no long-term LST analysis is necessary, and operational LST impacts would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAQMD recommends a quantified assessment of CO hotspots when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (2 percent) for any intersection with an existing level of service (LOS) D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

A detailed CO analysis was conducted in the Federal Attainment Plan for Carbon Monoxide (CO Plan) for the SCAQMD's 2003 AQMP, which is the most recent AQMP that addresses CO concentrations. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the SCAB and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the proposed Project, since it represents a worst-case scenario with heavy traffic volumes within the SCAB.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles County experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm one-hour CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic volume of approximately 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections within the City near the Project Site due to the comparatively low volume of traffic during Project operations (543 average daily trip on weekdays and 549 average daily trips on weekends [Saturday]) that would occur as a result of Project implementation. Therefore, impacts related to CO hotspots would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(2) and 2485, which both minimize the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also comply with the SCAQMD Rule 1113, which would minimize odor impacts from ROG emissions during architectural coating. Therefore, Project impacts would be less than significant.

IV. 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 US 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 US 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?	☐	☐	☐	☒

Explanation of Checklist Responses

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Less Than Significant Impact. The Project Site consists of land mapped as urban/developed and disturbed, and is currently developed with two commercial buildings and vacant land that has been previously disturbed. There are no natural vegetation communities within the entire Project Site, with ground cover consisting entirely of urban/developed areas. The Project Site includes three non-protected trees, two ficus trees and one evergreen tree, and ornamental shrubs, all of

which will be removed as part of the Project. Two evergreen pear trees that are located along the Azusa Avenue right-of-way will remain in place as part of the Project.

Due to the developed nature of the Project Site and vicinity, the vegetation and animal species supported in the limited ornamental landscaping include species that are commonly found in urban environments, and are not considered candidate, sensitive, or special-status species. The California Department of Fish and Wildlife California Natural Diversity Database (CNDDB) shows that there have been endangered, rare, or threatened species identified in the Baldwin Park 7.5' Quadrangle, an approximately 61-square mile area, (in which the Project Site is located).[12] However, the Project Site does not contain any Critical Habitat, as delineated by the US Fish and Wildlife Service, nor does it contain the habitat necessary to support any of the listed species.[13] Furthermore, the Project Site is located within the western portion of the City and is neither in nor adjacent to the City's areas of biological significance, including the riparian woodland and coast live oak woodland communities of the Covina Hills area or the unimproved riparian portion of the Walnut Creek area, both within the southeastern portion of the City, or the southerly riparian portion of Wingate Park, within the eastern portion of the City.[14]

The City's Natural Resources and Open Space Element discusses that one sensitive species of bird (the least Bell's vireo) and one sensitive species of reptile (the San Diego horned lizard) may potentially exist within the City limits, but the element concluded that their occurrence probability is considered low because current land use conditions are incompatible with their habitats. Therefore, based on the developed nature of the Project Site and the lack of habitat necessary to support candidate, sensitive, or special-status species, impacts to special-status plants or special-status wildlife species during project construction or operation would be less than significant.

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

No Impact. The Project Site does not contain any wetland or riparian habitat as identified by the National Wetlands Inventory.[15] As discussed above, the Project Site is not located within or adjacent to the riparian areas identified within the City, which include Covina Hills, Walnut Creek, and Wingate Park.[16] The CNDDB shows that there have been endangered, rare, or threatened species identified in the Baldwin Park Quadrangle, an approximately 61-square mile area (in which the Project Site is located).[17] However, the Project Site does not contain any Critical Habitat, as delineated by the US Fish and Wildlife Service, nor does it contain the habitat necessary to

[12] California Department of Fish and Wildlife, Biogeographic Information and Observation System, CNDDB Quad Species List, Baldwin Park Quadrangle, https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick, accessed April 4, 2022.

[13] US Fish and Wildlife Service, Critical Habitat for Threatened and Endangered Species Mapper, https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77, accessed April 4, 2022.

[14] City of Covina, General Plan, Natural Resources and Open Space Element, 2000.

[15] US Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed April 4, 2022.

[16] California Department of Fish and Wildlife, Biogeographic Information and Observation System, https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick, accessed April 4, 2022.

[17] California Department of Fish and Wildlife, Biogeographic Information and Observation System, CNDDB Quad Species List, Baldwin Park Quadrangle, https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick, accessed April 4, 2022.

support any of the listed species.[18] Therefore, based on the developed nature of the Project Site and the lack of riparian habitat, the Project would have no impact on any riparian habitat or other sensitive natural community.

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

No Impact. As discussed above, the Project Site does not contain any wetland or riparian habitat as identified by the National Wetlands Inventory.[19] Therefore, the Project would have no impact on state or federally protected wetlands.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant with Mitigation Incorporated. The Project Site is located in an urbanized area and is currently developed with two commercial buildings and vacant land that has been previously disturbed. No water bodies, wetlands, wildlife corridors, or native wildlife nursery sites that could serve as habitat for fish or wildlife occur on or adjacent to the Project Site. As such, the Project would not result in impacts to native resident or migratory fish species.

As previously described, there are three existing trees on-site that would be removed to accommodate the proposed development. Removal of such trees could potentially interfere with a nesting bird or raptor protected under the Migratory Bird Treaty Act if tree removal occurs during breeding, reproduction, and juvenile rearing periods for nesting birds and raptors (generally between February 15 to August 31). To minimize impacts to nesting birds and raptors during project construction, the Project would comply with **Mitigation Measure BIO-1**, pre-construction nesting bird surveys, as detailed below. With implementation of **Mitigation Measure BIO-1**, impacts to nesting or migratory birds would be less than significant.

> **Mitigation Measure BIO-1:** Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (February 15 through August 31), to reduce impacts to migratory birds that may be nesting on the Project site. If construction activities must be initiated during the migratory bird-nesting season, a pre-construction nesting bird survey should be conducted for by a qualified biologist within 3 days (72 hours) prior to the start of project construction activities to determine whether active nests are present within or directly adjacent to the construction zone, in accordance with the Migratory Bird Treaty Act.
>
> If an active nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no-work buffer, which will be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). A qualified biologist (with the ability to stop work) shall monitor the nest, and the

[18] US Fish and Wildlife Service, Critical Habitat for Threatened and Endangered Species Mapper, https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77, accessed April 4, 2022.

[19] US Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed April 4, 2022.

buffers may be adjusted (including increases or reductions to the buffer) by the qualified biologist on a case-by-case basis taking into consideration the location, type, duration and timing, and severity of work, distance of nest from project activities, surrounding vegetation and line-of-sight between the nest and work areas, and the species' site-specific level of habituation to the disturbance. The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A brief memo report should be prepared by the qualified biologist to document the location of all nests found (if any), their status (i.e., eggs or hatchlings present), existing biological conditions of the project area, and the bird species detected during the survey.

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

No Impact. As described above, the Project Site is located in a fully urbanized area and is currently developed with two commercial buildings and vacant land that has been previously disturbed. There are three non-protected trees, two ficus trees and one evergreen tree, and ornamental shrubs, all of which will be removed as part of the Project. Two evergreen pear trees that are located along the Azusa Avenue right-of-way will remain in place as part of the Project. The two ficus trees and one evergreen tree that are slated for removal do not meet the definition of "heritage trees" per CMC Section 17.83.020, and therefore are not covered by a tree preservation policy or ordinance. The Project would plant landscaping on-site to meet the types and minimum sizes of plant material (trees, shrubs, and groundcover) as required by CMC Section 17.62.027 for hotel uses permitted in the Project Site's C-3A zone with a conditional use permit. Street trees would be installed where required and where feasible in compliance with the requirements of the CMC. As such, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur**.**

f. Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

No Impact. As stated above, the Project Site is located in an urbanized area and is currently developed with two commercial buildings and vacant land that has been previously disturbed. The Project Site is not located within or near areas of biological significance within the City, nor is it located within an adopted Habitat Conservation or Natural Community Conservation Plan.[20] Given the developed and disturbed nature of the Project Site, the Project would not conflict with provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

[20] City of Covina, General Plan, Natural Resources and Open Space Element, 2000.

V. 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 CEQA Guidelines Section 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Explanation of Checklist Responses

The following analysis is based in part on the information contained in the *Cultural Resources Identification Memorandum* prepared for the Project by Michael Baker International, which is included as **Appendix B** of this IS/MND.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

No Impact. A historical resource is defined in CEQA Guidelines Section 15064.5(a)(3) as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period, or method of construction; representing the work of an important creative individual; or possessing high artistic values.

The Project Site was developed with citrus orchard rows in the 1920s and partially cleared in the 1950s, during which up to two residences were added to the site. Based on aerial records, the Project Site was left vacant and undeveloped by 1960. The existing office/commercial buildings were then constructed in 1963-1964 within the western portion of the Project Site.

The existing office/commercial structures were evaluated for eligibility in the California Register of Historical Resources. Based on the California Register evaluation, the structures are not considered to play an important role in the history of residential or commercial development in the City and are not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. Archival research did not demonstrate that the structures are associated with individuals who have made significant contributions to national, state, or local history. In addition, based on the design and architecture, the structures do not embody the distinctive characteristics of a type, period, region, or method of construction, nor do they represent the work of a master or possess high artistic values. Furthermore, the structures have not yielded and do not have the potential to yield information important to the understanding

of prehistory or history of the local area, state, or nation. As such, the existing structures would not be eligible for listing in the California Register.

In accordance with CMC Chapter 17.81, the structures were also evaluated for eligibility as a Covina Historic Landmark or Structure of Merit based on six criteria. As detailed in the Cultural Resources Identification Memorandum, the structures are not associated with important events or trends in City, local, state, or national history. In addition, the structures do not represent the work of a notable architect, designer, or builder, nor do they embody distinctive characteristics of a style, type, period, or method of construction, or are valuable examples of the use of indigenous materials or craftsmanship. They are not outstanding or high-style examples of Modern Ranch-style homes, as they exhibit alterations. For example, the incongruous roof style at the location where the two main buildings meet suggests the buildings may have been separate at one time, and appear to have been bridged by that section clad with rock veneer. Appearance of the structures has been notably changed by the replacement of roofing with different styles. Lastly, the smaller building at the rear of the site does not have any stylistic features and is not representative of any particular architectural style. Furthermore, the structures do not contribute to the significance of a geographically definable historic area or provide examples of an architectural or historic type or specimen in Covina, the state, or the nation. Therefore, the structures do not meet any of the criteria for designation as a Covina Historic Landmark or Structure of Merit.

No historical resources as defined by CEQA Section 15064.5(a) or CMC Chapter 17.81 were identified within the Project Site as a result of the South Central Coast Information Center (SCCIC) records search; literature, map, and aerial photo review; historical society consultation; pedestrian survey; and California and City Register evaluations. As such, the Project would have no impact on historic resources.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Less Than Significant with Mitigation Incorporated. An archaeological resource is defined in Section 15064.5(c) of the CEQA Guidelines as a site, area, or place determined to be historically significant as defined in Section 15064.5(a) or as a unique archaeological resource, which is defined in PRC Section 21083.2 as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest, or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historical event or person.

A California Historical Resources Information System Review records search at the SCCIC was conducted on April 18, 2022, for the Project Site and a surrounding 0.5-mile radius. As part of the records search and background research, the following federal and California inventories were reviewed: National Register of Historic Places; California Inventory of Historic Resources; California Points of Historical Interest; California Historical Landmarks; Archaeological Determinations of Eligibility for Los Angeles County; Built Environment Resource Directory for Los Angeles County; and California Historical Resources listing. No historical or archaeological resources as defined by CEQA Section 15064.5(a) or CMC Chapter 17.81 were identified within the Project Site.

Sensitivity for cultural resources consisting of archaeological sites is considered low based upon no known cultural resources, various natural factors, and the previous disturbance in the Project

area. As discussed in the Cultural Resources Identification Memorandum, SCCIC records indicate that no cultural resources were identified within the Project Site, and one resource was identified within the 0.5-mile search radius. This historic-period resource, P-19-187085, is located approximately 0.2 miles from the Project Site and is identified as Mojave Road. No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within the Project Site or 0.5-mile search buffer.

In addition, the Project Site was observed to be located approximately 0.61 miles south of San Dimas Wash. Proximity to water, a critical resource, is significant and this distance from water indicates a lower sensitivity to prehistoric occupation. However, while the Project Site is underlain by Holocene-age young alluvium (11,700 years ago to today), the soil has been heavily disturbed by modern development and has been identified as urban land according to soil mapping data.

Due to past disturbance from the development of the Project Site, there is low sensitivity for significant prehistoric or historic period archaeological resources. Nonetheless, **Mitigation Measure CUL-1** is included to require the proper handling and disposition of archaeological resources in the unexpected event that such resources are inadvertently discovered during Project construction. **Mitigation Measure CUL-1** would ensure that any impacts to archaeological resources would be less than significant.

> **Mitigation Measure CUL-1: Archaeological Resources Inadvertent Discovery.** In the event that cultural resources are unearthed during ground-disturbing activities, ground-disturbing activities must be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet must be established around the find where construction activities cannot be allowed to continue until a qualified archaeologist examines the newly discovered resource(s) and evaluates the area of the find. Work may be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities must be evaluated by a qualified professional archaeologist who meets the US Secretary of the Interior's Professional Qualifications Standards. If the resource appears to be significant, the qualified professional archaeologist, working under the direction of the lead agency and in coordination with Native American tribes and/or other stakeholders, will prepare an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource(s) along with subsequent laboratory processing, analysis, and curation.

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

Less Than Significant. No evidence of any prior human burials or use as a burial ground was identified for the Project Site during the records search and background research conducted for the Cultural Resources Identification Memorandum and Native American consultation process conducted for the Project. Based on the fully developed conditions on the site and the extent of disturbance on the entire property, the likelihood that Project construction would encounter and impact any human remains is expected to be remote. Nonetheless, in the event that human remains are inadvertently discovered during Project construction, the Project would be required to comply with Health and Safety Code Sections 7050.5 – 7055, Government Code Section 27491, and PRC Section 5097.98, the details of which are summarized in the standard condition

of approval articulated below. Compliance with these regulations would ensure that any impacts would be less than significant.

> **Condition of Approval: Human Remains Inadvertent Discovery.** In the event that human remains are discovered during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner determines that the remains are not subject to the provisions of Section 27491 of the Government Code, or any successor statute, or any other related provisions of law concerning the investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or their authorized representative, in the manner provided in PRC Section 5097.98, or any successor statute. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation or his or her authorized representative notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his/her/their authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he/she/they shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and the Covina Building Official.

VI. 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 construction of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Explanation of Checklist Responses

The following analysis is based in part on the information contained in the *Air Quality/Greenhouse Gas Emissions/Energy Data* report prepared for the Project by Michael Baker International, which is included as **Appendix A** of this IS/MND.

Methodology

The impact analysis focuses on the three sources of energy that are relevant to the proposed Project: electricity, natural gas, and transportation fuel for vehicle trips associated with Project operations as well as the fuel necessary for Project construction. The analysis of electricity/natural gas usage is based on CalEEMod version 2020.4.0 modeling, which quantifies energy use for occupancy. The Project's estimated electricity and natural gas consumption is based primarily on CalEEMod's default settings for Los Angeles County, and consumption factors provided by Southern California Edison (SCE) and Southern California Gas Company (SoCalGas), the electricity and natural gas providers for the Project Site, respectively. Based on the information provided by the applicant, the Project would not consume any natural gas on-site. The results of the CalEEMod modeling are included in **Appendix A**, *Air Quality, Greenhouse Gas Emissions, and Energy Calculations*. Operational fuel use was estimated using the CARB Emissions Factor 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel (i.e., diesel and gasoline) usage in the County, and the Project's trip generation from the Transportation Memo included as **Appendix G** of this IS/MND**.** The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The results of the modeling and construction fuel estimates are included in **Appendix A** of this IS/MND.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis under Checklist Question VI.a relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation,

maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

- **Criterion 2**: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3**: The effects of the project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4**: The degree to which the project complies with existing energy standards.
- **Criterion 5**: The effects of the project on energy resources.
- **Criterion 6**: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the Project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criterion 2, 4, and 5**. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses **Criterion 2, 4, and 6**, and the building energy demand analysis discusses **Criterion 2, 3, 4, and 5**.

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact.

Project-Related Sources of Energy Consumption

The Project's estimated energy consumption is summarized in Table VI-1, *Project and Countywide Energy Consumption*. As noted above, the Project would not include natural gas consumption. However, for a conservative analysis, the CalEEMod models natural gas consumption. As shown in Table VI-1, the Project's electricity usage would constitute an approximate 0.0022 percent increase over the County's typical annual electricity consumption and an approximate 0.0002 percent increase over the County's typical annual natural gas consumption. The Project's construction and operational fuel consumption would increase the County's consumption by 0.0033 percent and 0.0020 percent, respectively (**Criterion 1**).

Table VI-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption[1]	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	224 MWh	65,649,878 MWh	0.0022%
Natural Gas Consumption	7,182 Therms	2,936,687,098 Therms	0.0002%
Fuel Consumption			
Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[3]	12,480 Gallons	374,830,981 Gallons	0.0033%
Operational Automotive Fuel Consumption[3,4]	76,528 Gallons	3,845,945,898 Gallons	0.0020%

Key: MWh= Megawatt Hour

Notes:
1. As modeled in CalEEMod version 2020.4.0.
2. The Project's electricity and natural gas consumption during operation is compared to the total consumption in Los Angeles County in 2020. The Project's construction and operational fuel consumption are compared with the projected Countywide heavy-duty vehicle/diesel fuel consumption in 2023 (when construction starts) and on-road automotive fuel consumption in 2024 (operational year).
   Los Angeles County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed July 7, 2022.
   Los Angeles County natural gas consumption data source: California Energy Commission, *Natural Gas Consumption by County*, http://www.ecdms.energy.ca.gov/gasbycounty.aspx, accessed July 7, 2022.
   EMFAC2017 Model data source: https://arb.ca.gov/emfac/2017/, accessed July 7, 2022.
3. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2017 model.
4. The weekend average daily trip is used for modeling as it is larger than weekdays.

Source: Refer to **Appendix A**, *Air Quality, Greenhouse Gas Emissions, and Energy Data*, of this IS/MND for detailed model input/output data.

Construction-Related Energy Consumption

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, and architectural coating. As indicated in Table VI-1, the overall fuel consumption during Project construction would be 12,480 gallons, which would result in a nominal increase (0.0033 percent) in fuel use in the County. As such, Project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservations would occur during construction through compliance with state requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations, Section 2485). Project construction equipment would also be required to comply with the latest US EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and

reduce unnecessary fuel consumption. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials.[21] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or state. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (**Criterion 5**).

As demonstrated above, the Project would result in less than significant impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction.

Operational Energy Consumption

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model; rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Based on the Transportation Memo, the Project would generate 543 average daily trips per day during the weekdays and 549 average daily trips on weekends (Saturday). As indicated in Table VI-1, Project operations are estimated to add approximately 76,528 gallons of fuel consumption per year, which would increase Countywide automotive fuel consumption by 0.0020 percent. The Project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the Project. Nonetheless, it should be noted that the Project would include four parking spaces designated for electric vehicles and six designated for clean air vehicles in compliance with CALGreen standards. Additionally, a Commute Trip Reduction Program that aims to promote ride-sharing and public transportation options would be in place during Project operation. The program proposes several measures, which may include providing bus passes for all employees, designating a passenger loading area or short-term parking in front of the hotel to promote the use of ride-sharing services, and advertising shuttle-to-hotel services at the hotel to encourage vanpooling among hotel guests. This Project design feature would encourage and support alternative transportation modes by employees, customers, and visitors of the Project and thus reduce petroleum fuel consumption (**Criterion 4** and **Criterion 6**).

[21] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed July 7, 2022.

Overall, fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Building Energy Demand

The California Energy Commission (CEC) developed 2020 to 2035 forecasts for energy consumption and peak demand in support of the 2021 Integrated Energy Policy Report (IEPR) for each of the major electricity and natural gas planning areas and the state based on the economic and demographic growth projections.[22] The CEC forecasts that the statewide annual average growth rates of energy demand between 2021 and 2030 would be 1.3 percent to 2.3 percent for electricity and less than 0.1 percent to 0.8 percent increase for natural gas.[23] As shown in Table VI-1, operational energy consumption of the Project would represent an approximate 0.0022 percent increase in electricity consumption and an approximate 0.0002 percent increase in natural gas consumption over the current Countywide usage, which would be significantly below the CEC's forecasts and the current Countywide usage. Therefore, the Project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the Project would consume energy during the same time periods as other commercial developments. As a result, the Project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

The project would be required to comply with the most current version of the Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2022 Title 24 standards significantly reduces energy usage. The Title 24 Building Energy Efficiency Standards are updated every three years and become more stringent between each update; therefore, complying with the latest 2022 Title 24 standards would make the project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards. Compliance with 2022 Title 24 standards would also ensure the project would be consistent with EAP by incorporating sustainable building design features to save energy consumptions (**Criterion 4**).

The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS) reflected in SB 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by the end of 2020, 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent of total procurement by 2030. In addition, the Project would install rooftop solar panels and generate renewable energy on-site. Renewable energy is generally defined as energy that comes from resources that are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that the Project would not result in the waste of the finite energy resources (**Criterion 5**).

---

22 California Energy Commission, *Final 2021 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*, February 2022. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Figure 10 and Figure 14, respectively.

23 California Energy Commission, *Final 2021 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*, February 2022.

As demonstrated above, the Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during Project operation, or preempt future energy development or future energy conservation. Therefore, impacts would be less than significant impact.

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

Less than Significant Impact. The City adopted its EAP in December 2012 and updated it in 2019. The 2019 EAP update includes updates and revisions to municipal operations that were referenced in the 2012 EAP. The purpose of the EAP is to identify the City's long-term vision and commitment to achieve energy efficiency in the community and in municipal operations. The Energy Efficiency Strategy chapter of the EAP provides a comprehensive set of electricity-related energy efficiency targets, goals, policies, and actions to help the community and the City become more energy-efficient. The Project proposes to incorporate several energy efficiency design features that are consistent with EAP goals and policies. Project consistency with applicable EAP goals and policies is analyzed in Table VI-2, *Consistency with Energy Action Plan*.

Table VI-2
Consistency with Energy Action Plan

Goals/Policies	Project Consistency
Goal 2: Strengthen the business community and reduce energy use in the nonresidential building stock. • Policy 2.1: Strengthen business relationships by educating businesses about opportunities to conserve energy costs and reduce energy uses through improvements in daily operations. • Policy 2.2: Encourage the use of innovative energy-efficient appliances and equipment in businesses that will reduce operational expenditures and improve that efficiencies of business operations.	**Consistent**. The Project would comply with all applicable Title 24 and CALGreen standards that aim to reduce energy use. Specifically, the Project would install energy-efficient appliances, high-efficiency lighting, water-efficiency irrigation systems, and low-flow water fixtures, and utilize all electric landscape equipment. Additionally, the Project would be designed with a solar-ready roof for the future installation of on-site renewable energy. Further, the Project would provide bicycle parking spaces and electric vehicle parking spaces that would further promote alternative modes of transportation and reduce fuel consumption. As discussed above, the Project would implement a Commute Trip Reduction Program that would further reduce fuel consumption during operation by promoting ride share and public transportation. As such, the Project would be consistent with Goal 2 and Policies 2.1 and 2.2.
Goal 3: Maximize the efficiency of all new buildings. • Policy 3.1: Maximize the energy-efficient design and orientation of new, remodeled, and renovated buildings through voluntary sustainable building standards. • Policy 3.2: Encourage the use of energy-efficient appliances and equipment in new buildings. • Policy 3.3: Participate in a regional effort to implement energy efficiency standards for new development.	**Consistent**. As discussed above, the Project would comply with all applicable building standards per Title 24 and CALGreen, which would include the installation of energy-efficient appliances, high-efficiency lighting, water-efficiency irrigation systems, and low-flow water fixtures, and utilization of all electric landscape equipment for landscape maintenance. Additionally, the Project would receive its electricity from SCE, which is required to comply with the RPS procurement goal of 50 percent renewable energy in 2030. As such, the Project would be consistent with Goal 3 and Policies 3.1 through 3.3.

Goal 5: Maximize the use of shading and cooling to sustain a comfortable and energy-efficient urban environment. • Policy 5.1: Maximize the cooling of buildings through strategic tree planting and shading to reduce building electricity demands.	**Consistent.** The Project would provide 6,329 square feet of landscaped area, which would encompass 17 percent of the Project Site. The areas surrounding the building, driveways, and parking stalls would be landscaped with trees and/or shrubs, which would provide shade to the Project Site. As such, the Project would be consistent with Goal 5 and Policy 5.1.
Source: City of Covina, *Energy Action Plan*, adopted 2012 and updated 2019.	

As shown above, the Project would adhere to 2022 Title 24 and CALGreen standards and would implement several project design features consistent with the EAP. Therefore, the Project would not conflict with an adopted plan, policy, or regulation pertaining to energy efficiency and impacts would be less than significant.

VII. 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 substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
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 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 California Building Code (2004), creating substantial 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?	☐	☒	☐	☐

Explanation of Checklist Responses

This section is based, in part, on the *Geotechnical Evaluation Report and Addendum* prepared by Duco Engineering, which are included as **Appendix C** of this IS/MND.

a.i) Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 serves to mitigate the hazard of surface faulting to structures for human occupancy, and is intended to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue maps delineating these zones. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years.

The Project Site is located at 578 N. Azusa Avenue in a seismically active region in Southern California near several fault systems. According to the California Geological Survey (CGS), the Project Site is not mapped within a state-designated Alquist-Priolo Earthquake Fault Zone.[24] According to the City's Safety Element, two potentially active earthquake faults pass through the City: 1) the Indian Hill Fault, which runs through a portion of the northeastern section of the City, and 2) the Walnut Creek Fault, which traverses southeastern Covina along Walnut Creek.[25] Mapped faults and zones in the vicinity of the Project Site include Indian Hill Fault (0.9 miles east/southeast), Walnut Creek Fault (2.11 miles southeast), Duarte Fault/Sierra Madre Fault Zone (2.6 miles north), Upper Duarte Fault/Sierra Madre Fault Zone (3.4 miles northwest), Sierra Madre Fault/Sierra Madre Fault Zone (4.0 miles north), San Jose Fault (4.35 miles southeast), Whittier Fault/Elsinore Fault Zone (9.6 miles south), East Montebello Fault/East Montebello Fault Zone (10.2 miles southwest), and San Andreas Fault Zone (23.12 miles northeast).[26] As described in the Addendum to the Geotechnical Report, while the Walnut Creek Fault is considered potentially active, comparatively little is known about its slip rate or potential ground motions, and the US Geological Survey considers its mapping certainty poor, based solely on inferred mapping. Consequently, the Walnut Creek Fault is not considered a source fault by the National Seismic Hazard Mapping Program (NSHMP). Neither the Walnut Creek Fault nor Indian Hill Fault is considered a source fault by the current (2014) edition of the NSHMP sources, although the Indian Hill Fault is mapped with more certainty and is considered to be a more recently active fault trace. Despite this uncertainty, the Walnut Creek Fault will be included in the 2023 edition of the NSHMP source database. As discussed in the Safety Element, the City does not consider the Indian Hill Fault and Walnut Creek Fault to be significant seismic threats or hazards to the community, and the City continues to monitor the two faults for any officially documented movement. The proposed Project would be designed and constructed in compliance with the 2022 California Building Standards Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. As such, the Project would not directly or indirectly cause substantial adverse

---

[24] California Department of Conservation, California Geological Survey, *EQ Zapp: California Earthquake Hazards Zone Application*, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed April 4, 2022.

[25] City of Covina, General Plan, Safety Element, 2000, Section II.

[26] California Department of Conservation, California Geological Survey, *EQ Zapp: California Earthquake Hazards Zone Application*, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed April 4, 2022; Duco Engineering, Geotechnical Evaluation Report, Proposed Hotel Development 578 N. Azusa Ave., August 24, 2022; Addendum, October 25, 2022. See **Appendix C** of this IS/MND.

effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, impacts would be less than significant.

a.ii) Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. Ground shaking is the primary cause of structural damage during an earthquake. Magnitude, duration, and vibration frequency from earthquakes would vary greatly, depending on the fault and its distance from the Project Site. As discussed in Checklist Question VII.a.i, the faults and zones mapped nearest to the Project Site include the Indian Hill Fault, Walnut Creek Fault, Duarte Fault/Sierra Madre Fault Zone, Upper Duarte Fault/Sierra Madre Fault Zone, Sierra Madre Fault/Sierra Madre Fault Zone, and San Jose Fault. Seismic activity along these faults or on any other of the numerous faults in the Southern California area could cause seismic ground shaking in the City. The City requires the Project to be designed and constructed in accordance with the 2022 California Building Standards Code, which was adopted by the City by reference per CMC Chapter 14.04. In addition, the Project would be required to implement site-specific geotechnical recommendations related to seismic criteria to minimize public exposure to seismic ground shaking to the extent feasible. As such, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, impacts would be less than significant.

a.iii) Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking. Liquefaction is defined as the transformation of granular material from a solid state into a liquefied state as a consequence of increased pore-water pressure. Liquefaction typically occurs during prolonged ground shaking events such as earthquakes, and the soil acquires mobility sufficient to permit both horizontal and vertical movements. Based on the borings conducted for the Project's Geotechnical Evaluation, the site is underlain by soft native soils to a depth of up to 4 to 5 feet, observed to generally consist of soft, brown silty sands with scattered debris. Native soils were encountered immediately beneath these fills, consisting of fine silty sands with coarser layers and the occasional silt lens at greater depth. Topographically, the site is relatively level precluding any slope stability hazards.

According to the CGS, the Project Site is not mapped within a Liquefaction Zone of Required Investigation.[27] In addition, based on the sample test borings in the Project Site, groundwater was not encountered during explorations that reached a depth of 50 feet. As described in the Geotechnical Evaluation, the CGS has mapped the likely historic highwater of the Project Site at a depth of approximately 175 feet, which is supported by well data from the County of Los Angeles.[28] Additionally, according to the City's Safety Element, liquefaction has not historically been an issue within the City and appears to have very limited future hazard potential because the water table is generally more than 50 feet deep and there are believed to be no areas of loose,

---

[27] California Department of Conservation, California Geological Survey, *EQ Zapp: California Earthquake Hazards Zone Application*, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed April 4, 2022.

[28] Duco Engineering, Geotechnical Evaluation Report, Proposed Hotel Development 578 N. Azusa Ave., August 24, 2022. See **Appendix C** of this IS/MND.

cohesionless soils.[29] Furthermore, as the Project would be required to be designed in accordance with California Building Standards Code and CMC standards, Project impacts related to liquefaction hazards would be less than significant**.**

a.iv) Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. Landslides tend to occur in weak soil and rock on sloping terrain. According to the Safety Element, there have been no documented cases of major landslides because the City is predominantly flat.[30] According to the CGS, the Project Site is not mapped within a Landslide Zone of Required Investigation.[31] As with most areas within the City, the Project Site is characterized by relatively flat topography, and no unusual geographic features exist on the site or in its vicinity. Thus, based on its location, the Project Site does not have the potential to slide or to experience sliding from adjacent areas. As such, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact related to landslides would occur.

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

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, the Project would be subject to the requirements of CMC Section 8.50.100. Specifically, as the Project Site is 0.84 acres and less than 1 acre, the Project would be required to prepare and submit to the City an erosion and sediment control plan with best management practices (BMPs) designed to ensure that discharges of pollutants are effectively prohibited and will not cause or contribute to an exceedance of water quality standards. Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. No construction activity would begin prior to receipt of written approval of such plan. Furthermore, the Project construction activities would be required to comply with SCAQMD Rule 403, which would reduce the potential for wind erosion by requiring the implementation of dust control measures during construction. During operations, the majority of the fully developed site would be covered by impervious paved and built surfaces, which would not result in soil erosion following construction. Unpaved areas would be landscaped, which would also prevent soil erosion. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

c. Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. The Project Site has a relatively flat topography, with no hillsides on-site or in the surrounding area. Furthermore, the Project Site is not located on a cliff,

[29] City of Covina, General Plan, Safety Element, 2000, Section II.
[30] City of Covina, General Plan, Safety Element, 2000, Section II.
[31] California Department of Conservation, California Geological Survey, *EQ Zapp: California Earthquake Hazards Zone Application*, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed April 4, 2022.

mountainside, bluff, or other geographic feature with stability concerns. As discussed above, the Project Site is not susceptible to liquefaction and landslides.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No extraction of gas, oil, or geothermal energy is occurring or is planned at the Project Site. According to the Safety Element, because of decreasing amounts of water extracted from below the surface in Covina in recent years, subsidence has not been an issue in the City. Furthermore, based on the Geotechnical Investigation, groundwater was not encountered during explorations that reached a depth of 50 feet and is not anticipated at any elevation that would affect the development. As such, Project impacts related to subsidence would be less than significant.

Collapsible soils consist of loose, relatively low-density materials that collapse and compact under the addition of water or excessive loading. As described in the Geotechnical Investigation, soils and fill will be compacted, and grading and structural design of the Project would comply with recommendations of the final geotechnical report and the applicable standards of the California Building Standards Code. As such, Project construction activities would ensure that the proposed building foundation would provide a stable footing for the new building.

Therefore, the Project would not be located on a geologic unit that is unstable or that would become unstable as a result of the Project, and related impacts would be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2004), creating substantial risks to life or property?

Less Than Significant Impact. Expansion testing was performed on near-surface fill and native soils as part of the Geotechnical Evaluation conducted for the Project. The results showed that these soils are considered to have a low expansion potential. Nonetheless, the Geotechnical Evaluation does include grading and expansive soil design/test recommendations as it is possible that the soils that will directly affect the surrounding foundations may vary. Therefore, with implementation of all geotechnical recommendations, the Project's impacts related to expansive soils would be less than significant.

e. Would the project 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. No septic tanks or alternative wastewater disposal systems are proposed as part of the Project. As the Project Site is currently developed, sewer and wastewater infrastructure are currently in place. Furthermore, the site is connected to the public sewer system in the City. Therefore, no impact would occur with regard to sewers or alternative wastewater disposal systems.

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

Less Than Significant with Mitigation Incorporated. The Project Site does not contain any unique geological feature or formation. As discussed previously, the entire Project property has been previously disturbed with development and is currently developed with two existing buildings and vacant land. Construction of the Project is anticipated to require removal of soil and materials

of 5 to 6 feet below existing grade. In addition, the proposed drywell ground infiltration system would require a depth of up to 40 feet below grade in the northwestern portion of the Project Site.

Geologic maps alluvial deposits of middle Holocene age directly underlie the Project Site. According to the Project's Geotechnical Investigation, the near-surface soils encountered in subsurface explorations consisted of soft native soils to a depth of up to 4 to 5 feet, observed to generally consist of soft, brown silty sands with scattered debris. Competent native soils were encountered immediately beneath these fills, consisting of fine silty sands at contact, with coarser stratum and the occasional silt lens at greater depth. Only one of the boreholes from the Geotechnical Investigation reached depths of 40 or more feet and found similar sediments to those found at shallower depths. Because the dip of the fossil-bearing formations is towards the Project Site, it is possible they underlie the Project Site at depth and in areas outside of the one deep borehole. Based on preliminary review, although not found in the Project Site, middle to late Miocene Monterey or Puente Formation deposits can be found 1-2 miles east/southeast of the Project Site and have produced mammal and ray-finned fish fossil. Fossils of mantis shrimp have also been found from Topanga Formation deposits approximately 3 miles northeast of the Project Site. A preliminary search of the University of California Museum of Paleontology and San Diego Natural History Museum collections databases did not produce previous fossil results. Both the Monterey and Topanga Formations have yielded significant fossils of other vertebrates throughout southern California. Overall, the Project Site can be considered to have Low to No Sensitivity for fossils. Nonetheless, **Mitigation Measure GEO-1** is included to require the proper handling and disposition of paleontological resources in the unexpected event that such resources are inadvertently discovered during Project construction. **Mitigation Measure GEO-1** would ensure that any impacts to paleontological resources would be less than significant.

> **Mitigation Measure GEO-1: Paleontological Resources Inadvertent Discovery.** Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or designee. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontology monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology (SVP).

VIII. 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?	☐	☐	☒	☐

Explanation of Checklist Responses

The following analysis is based in part on the information contained in the *Air Quality/Greenhouse Gas Emissions/Energy Data* report prepared for the Project by Michael Baker International, which is included as **Appendix A** of this IS/MND.

Methodology

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. SCAQMD developed an interim GHG threshold, which was 10,000 $MTCO_2e$ for industrial projects and 3,000 $MTCO_2e$ for non-industrial projects. Given the proposed Project is a hotel, the 3,000 $MTCO_2e$ threshold is used to evaluate the scale of the Project's GHG emissions for informational purposes only. The SCAQMD, CARB, and other state or regional agencies have not yet adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Therefore, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

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

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

Less Than Significant Impact.

Project-Related Sources of Greenhouse Gases

The proposed Project would result in direct and indirect emissions of carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4), and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct Project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from energy consumption, water demand, and solid waste generation. The most recent version of CalEEMod, version 2020.4.0, was used to calculate direct and indirect Project-related GHG emissions. As a conservative analysis, the existing GHG emissions have not been deducted from the emissions. Table VIII-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO_2, N_2O, and CH_4 emissions of the proposed Project. CalEEMod outputs are contained in **Appendix A.**

Table VIII-1
Estimated Greenhouse Gas Emissions

Source[6]	CO_2	CH_4		N_2O		Total
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	Metric Tons/yr[1]	Metric Tons of CO_2e[2]	Metric Tons of CO_2e[3]
Direct Emissions						
• Construction[4]	8.64	<0.01	0.04	<0.01	0.04	8.71
• Area Source	<0.01	0.00	0.00	0.00	0.00	<0.01
• Mobile Source	438.03	0.03	0.81	0.02	5.99	444.82
Total Direct Emissions[3]	*446.67*	*0.03*	*0.85*	*0.02*	*6.03*	*453.53*
Indirect Emissions						
• Energy	78.13	<0.01	0.10	<0.01	0.33	78.57
• Solid Waste	1.89	0.11	2.79	0.00	0.00	4.68
• Water Demand	4.31	0.05	1.13	<0.01	0.33	5.77
Total Indirect Emissions[3]	*84.33*	*0.16*	*4.03*	*<0.01*	*0.66*	*89.02*
Total Project-Related Emissions[3]	***542.55 $MTCO_2e$/year***					
SCAQMD Recommended Thresholds for Non-industrial Project	***3,000 $MTCO_2e$/year***					
Exceed Threshold?	***No***					

Notes:
$MTCO_2e$ = Metric tons carbon dioxide equivalent; yr = year
1. Emissions calculated using the CalEEMod version 2020.4.0.
2. Carbon dioxide equivalent values calculated using the US Environmental Protection Agency, *Greenhouse Gas Equivalencies Calculator*, https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed July 15, 2022.
3. Totals may be slightly off due to rounding.
4. Total Project construction GHG emissions equate to 261.32 $MTCO_2e$. However, construction emissions are amortized over the lifetime of the Project (assumed to be 30 years) and added to operational GHG emissions consistent with SCAQMD's guidance.

Refer to **Appendix A,** *Air Quality/Greenhouse Gas Emissions/Energy Data*, of this IS/MND for detailed model data.

Direct Project-Related Source of Greenhouse Gases

Construction Emissions. Construction GHG emissions are amortized (i.e., total construction emissions divided by the lifetime of the Project, assumed to be 30 years), then added to the operational emissions.[32] As seen in Table VIII-1, construction of the proposed Project would result in a total of 8.71 $MTCO_2e$ (metric tons carbon dioxide equivalent) (amortized over 30 years), which represents a total of approximately 261.32 $MTCO_2e$ from construction activities.

Area Source. Area source emissions were calculated using CalEEMod and Project-specific land use data. Project-related area sources include exhaust emissions from landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain landscaping. The Project would be designed and constructed with sustainability features, which may include the use of all electric landscape maintenance equipment. These Project features have been accounted for in CalEEMod. As noted in Table VIII-1, the proposed Project would result in less than 0.01 $MTCO_2e$ per year of area source GHG emissions.

Mobile Source Emissions. Based on the Transportation Memo (**Appendix G** of this IS/MND), the Project would generate 543 average daily trips on weekdays and 549 average daily trips on weekends (Saturday), which equates to approximately 444.82 $MTCO_2e$/year of mobile source-generated GHG emissions as modeled in CalEEMod; refer to Table VIII-1. Moreover, it should be noted that a Commute Trip Reduction Program that aims to promote ride-sharing and public transportation options would be in place during Project operation. The program proposes several measures, which may include providing bus passes for all employees, designating a passenger loading area or short-term parking in front of the hotel to promote the use of ride-sharing services, and advertising shuttle-to-hotel services at the hotel to encourage vanpooling among hotel guests.

Indirect Project-Related Source of Greenhouse Gases

Energy Consumption. Energy (electricity and natural gas) consumption emissions were calculated using the CalEEMod model and Project-specific land use data. The Project's estimated electricity and natural gas consumption is based primarily on CalEEMod's default settings for Los Angeles County, and consumption factors provided by SCE and SoCalGas, the electricity and natural gas providers for the Project vicinity, respectively. The Project would be design and constructed with sustainability features, which may include the installation of high-efficiency lighting and energy-efficient appliances; these Project features have been accounted for in CalEEMod. Additionally, the Project proposes a solar-ready roof for the future installation of on-site renewable energy generation. Based on the information provided by the Project applicant, the Project would not consume natural gas on-site. However, to provide a conservative analysis, natural gas consumption was modeled in CalEEMod. Overall, the Project would indirectly result in 78.57 $MTCO_2e$ per year of GHG emissions due to energy consumption; refer to Table VIII-1.

Water Demand. The Project would be designed and constructed with sustainability features, which may include the installation of low-flow fixtures and water-efficient irrigation; these Project features have been accounted for in CalEEMod. Emissions from indirect energy impacts resulting from water demand associated with operations of the proposed Project would result in 5.77 $MTCO_2e$/year; refer to Table VIII-1.

[32] Thirty years is considered to represent the life of the Project, in accordance with SCAQMD guidance.

Solid Waste. Solid waste associated with operations of the proposed Project would result in 4.68 $MTCO_2e$/year; refer to Table VIII-1.

Total Project-Related Sources of Greenhouse Gases

As shown in Table VIII-1, the proposed Project-related GHG emissions from direct and indirect sources combined would total 542.55 $MTCO_2e$/year, which is lower than the recommended SCAQMD interim GHG threshold for non-industrial projects (3,000 $MTCO_2e$/year). Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions; refer to Checklist Question VIII.b.

Consistency with Applicable GHG Plans, Policies, or Regulations

The follow discussion focuses on the Project's consistency with SCAG's 2020-2045 RTP/SCS and CARB's 2022 Scoping Plan. The City's EAP also discusses the City's goals and policies in regard to GHG emissions. Nonetheless, as the EAP correlates to energy, a detailed analysis of the Project's consistency with the EAP's goals and policies has been included in Checklist Section VI, Energy, and has not been provided in this section. According to Checklist Question VI.b, the Project would be consistent with the EAP.

Consistency with the SCAG 2020-2045 RTP/SCS

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. Table VIII-2, *Consistency with the 2020-2045 RTP/SCS*, shows the Project's consistency with these five GHG emission reduction strategies found in the 2020-2045 RTP/SCS. As shown, the proposed Project would be consistent with these strategies.

Table VIII-2
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	**Consistent.** The City defines a TPA as an area that is located one-half mile from an existing major transit stop or an existing transit stop along a high-quality transit corridor. According to the Transportation Memo, the Project is located within a TPA; refer to **Appendix G**. The Project is located within an urbanized, pedestrian-oriented area, with existing sidewalks to the south (Glentana Street) and west (North Azusa Avenue). The Project Site is located approximately 500 feet from several existing bus stops at the intersection of San Bernardino Road and North Azusa Avenue and is within walking and biking distance of existing commercial uses (along North Azusa Avenue) that would contribute to reduction in vehicles miles travelled (VMT) and associated GHG emissions. Further, the Project proposes four parking spaces designated for electric vehicles and six spaces designated for clean air vehicles in accordance with the 2022 Title 24 standards and CALGreen Code. The Project would not provide a surplus of parking at the City's request, which would further encourage alternative modes of transportation. Moreover, a Commute Trip Reduction Program that aims to promote ride-sharing and public transportation options would be in place during Project operation. The program proposes several measures, which may include providing bus passes for all employees, designating a passenger loading area or short-term parking in front of the hotel to promote the use of ride-sharing services, and advertising shuttle-to-hotel services at the hotel to

Table VIII-2
Consistency with the 2020-2045 RTP/SCS

		encourage vanpooling among hotel guests. Therefore, the Project would focus growth near destinations and mobility options. The Project would be consistent with this reduction strategy.
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.	**Not Applicable.** As a commercial Project, the proposed hotel would not directly provide housing; however, the Project would be located near existing residential and commercial uses (i.e., along North Azusa Avenue) that would contribute to reduction in VMT and associated GHG emissions.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	HQTA, TPAs, NMA, Livable Corridors.	**Consistent.** The Project would include a solar-ready roof and install electric vehicle parking spaces in accordance with the 2022 Title 24 standards and CALGreen Code. Therefore, the proposed Project would leverage technology innovations to promote alternative modes of transportation and help the City, County, and state meet their GHG reduction goals. The Project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to	Center Focused	**Consistent.** As previously

Table VIII-2
Consistency with the 2020-2045 RTP/SCS

support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	discussed, the proposed Project would install electric vehicle parking spaces to promote alternative modes of transportation. Further, the Project would comply with and exceed sustainable practices required by the 2022 Title 24 standards and CALGreen Code and may include the use of all electric landscape maintenance equipment, high-efficiency lighting, energy-efficient appliances, low-flow fixtures, and water-efficient irrigation. Thus, the Project would be consistent with this reduction strategy.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape	Green Region, Urban Greening, Greenbelts and Community Separators.	**Consistent.** The proposed Project consists of a commercial development in an urbanized area and would not interfere with regional wildlife connectivity or convert agricultural land. The Project would be required to comply with 2022 Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. Specifically, the Project

Table VIII-2
Consistency with the 2020-2045 RTP/SCS

• Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space		would provide 6,329 square feet of landscaped area (17 percent of the Project Site). The areas surrounding the building, driveways, and parking stalls would be landscaped with trees and/or shrubs, which would provide shade to the Project Site. The proposed hotel would also have a solar-ready roof for future on-site production of renewable energy. Thus, the Project would support resource-efficient development that reduces energy consumption and GHG emissions. The Project would be consistent with this reduction strategy.
Source: Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.		

Consistency with the 2022 CARB Scoping Plan

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. Table VIII-3, *Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors*, is an evaluation of applicable reduction actions/strategies to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

Table VIII-3
Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors

Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Consistent**. The Project proposes construction of a hotel. The Project would provide electrical vehicle charging stations and designated parking spaces, which would promote alternative mode of transportation that can reduce VMT. Moreover, the Project would implement a Commute Trip Reduction Program that aims to promote ride-sharing and public transportation options would be in place during Project operation. The program proposes several measures, which may include providing bus passes for all employees, designating a passenger loading area or short-term parking in front of the hotel to promote the use of ride-sharing services, and advertising shuttle-to-hotel services at the hotel to encourage vanpooling among hotel guests. As such, the project would be consistent with this action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	**Consistent**. There would be no natural gas used for heating and cooking on-site. As such, the Project would be consistent with this action.
Food Products	
Achieve 7.5% of energy demand electrified directly and/or indirectly by 2030 and 75% by 2045.	**Consistent**. As mentioned above, there would be no natural gas used for heating and cooking on-site. As such, the Project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025.	**No Conflict**. The Project is required to comply with AB 341. As such, the Project would have no conflict with this action.
Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.	

Conclusion

In summary, the consistency analysis provided above demonstrates that the proposed Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in SCAG's 2020-2045 RTP/SCS, CARB's 2022 Scoping Plan, and the City's EAP. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to GHG emissions would be less than significant.

IX. 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, 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?	☐	☐	☐	☒

Explanation of Checklist Responses

Responses to the following questions include information from site investigations and assessments of prior land use activities regarding potential environmental contaminants in the Phase I Environmental Site Assessment (ESA) and Addendum prepared by PIC Environmental Services, which are included in **Appendix D** of this IS/MND.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners, would be routinely used on the Project Site. However, all potentially hazardous materials used during Project construction would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the Covina Building and Safety Division. These existing regulations are aimed at limiting the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

During operations, the proposed hotel uses would involve the use of equipment and materials that are standard in the general operation of hotel, surface parking, and landscaping uses. Small amounts of commercially available hazardous materials may be used for regular cleaning and maintenance activities, which would neither require the storage, use, or disposal of substantial amounts of hazardous materials nor generate significant quantities of hazardous waste, and would thus not be subject to any special handling or permitting requirements. Therefore, this Project's operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The Project Site was developed with citrus orchard rows in the 1920s and partially cleared in the 1950s, during which up to two residences were added to the site. The existing buildings were constructed in 1963-1964 (by which time the former residences were removed) on the western portion of the Project Site. As provided in the Phase I ESA, there is no evidence of recognized environmental conditions (RECs) in connection with the Project Site or adjoining or nearby properties. There are no underground or aboveground storage tanks within the Project Site, and no oil/gas wells are within the Project Site or adjoining properties. However, due to the age of the structures to be demolished, hazardous materials such as lead-based paint (LBP) and/or asbestos-containing materials (ACM) could be released.

In the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and

disposal of LBP prior to construction activities, including standard handling and disposal practices pursuant to Occupational Safety and Health Administration regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials; containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed; and certification of all consultants and contractors conducting activities involving LBP or lead hazards.

In the event that ACM are found on-site during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. In addition, Project development would include the use of commercially sold construction materials without ACM. With compliance with applicable regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

As detailed in the Phase I ESA, the Project Site does not contain subsurface structures or facilities used to process, store, or discharge petroleum or hazardous substances. Historical use of the Project Site included a citrus orchard until 1960. Organochlorine pesticides (e.g., DDT) were used extensively in the United States from the 1940s through the 1960s until the pesticides were banned in the 1970s. The pesticides were banned primarily because the compounds do not readily break down into harmless chemicals. As a result, small residual amounts of these pesticides may persist in shallow soil for decades. Based on the Phase I ESA Addendum, abundant shallow soil testing at other numerous properties has determined that elevated concentrations of organochlorine pesticides above regulatory action levels are very rare and are almost exclusively found in small areas where mixing and storage of the pesticides was conducted. Review of aerial photos at the Project Site found no evidence of a shed or barn where pesticides could have been stored or mixed. Most importantly, grading operations conducted after the orchard was removed and prior to construction of the existing buildings would have mixed and diluted residual pesticides with deeper, uncontaminated soil well below federal EPA action levels.

Therefore, the Project would not 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, and impacts would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The school nearest to the Project Site and within 0.25 miles is Northview High School, which is located at 1016 Cypress Street, approximately 413 feet (0.08 mile) northwest. As discussed above, no RECs have been identified on or adjacent to the Project although, due to the age of the existing buildings, LBP and/or ACM are potentially present on-site. However, as stated in Checklist Question IX.a, the Project would adhere to all applicable regulations for the removal of LBP and ACM, and mandatory compliance would reduce associated risks to a less-than-significant level. As discussed above, Project construction activities would involve the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners; however, all potentially hazardous materials used during Project construction would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and

management of hazardous materials. During operation, the indoor and outdoor usage of the proposed hotel would not generate hazardous air emissions or handle hazardous or acutely hazardous materials, substances, or waste. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts would be less than significant.

d. Would the project 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. As included in the Phase I ESA, a records search was conducted by EDR to determine the potential for or existence of on-site and/or off-site unauthorized releases of hazardous materials related to on-site and/or off-site aboveground or underground storage tanks or other potential sources. The results showed that the Project Site does not appear on any of these databases. Within a 0.5-mile radius, nine sites have been shown to have sustained soil and/or groundwater contamination due to underground storage tank leaks. The nearest sites to the Project Site are attributed to gas stations and auto services located approximately 0.1 mile from the Project Site. As discussed in the Phase I ESA, all of these sites received regulatory closure after completing the required remedial actions. It is unlikely that the Project Site has been impacted by these off-site areas as well as additional concerning properties located within a 1-mile radius. Therefore, no impact would occur.

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

No Impact. The Project Site is not located within an airport land use plan area or within 2 miles of a public airport or public use airport. The nearest public airports are Brackett Field Airport, approximately 6.5 miles to the east, and San Gabriel Airport, approximately 7.1 miles to the west. Therefore, the Project would not result in impacts related to airport-related safety hazards or excessive noise.

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

Less Than Significant Impact. As stated in the City's Safety Element, all major public streets serve as the principal evacuation routes.[33] For the Project, the nearest disaster routes would include Azusa Avenue, which is immediately west of the Project Site, and the San Bernardino Freeway (I-10), which is approximately 1.25 miles south of the Project Site. The goals of the City's Emergency Plan include informing citizens and businesses of potential concerns, taking appropriate steps to minimize damage and injury in a hazardous incident, and ensuring effective communication and efficient service when a disaster occurs. The organization of the Emergency Plan is based on the Incident Command System, which is routinely used by fire and police departments and provides clear authority, direction, and communication during an emergency. During construction of the Project, staging would occur within the Project Site. Access to and along Azusa Avenue adjacent to the Project Site would remain unobstructed, and Glentana Street would remain accessible to emergency vehicles. The Project would also be required to undergo

[33] City of Covina, General Plan, Safety Element, 2000, Section VII.

site plan review and obtain approval from the City to verify that the Project complies with all applicable safety and access requirements. During long-term operation, adequate access for emergency vehicles to Azusa Avenue would be provided by a new Project driveway. While the Project would not propose changes within major public streets such as Azusa Avenue, the Project would relocate an existing alley along Glentana Street to less than 100 feet to the east within the Project Site. The relocated alley would still provide ingress and egress along Glentana Street, which is a dead-end street to the east (i.e., not an evacuation route). As such, this proposed change would not impair or interfere with an emergency response or evacuation plan. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant**.**

g. Would the project 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 an urbanized area and is not adjacent to any wildland areas. According to the California Department of Forestry and Fire Protection (CalFire), the Project Site is not located within a Fire Hazard Area.[34] The nearest Fire Hazard Areas are a Very High Fire Hazard Severity Zone (VHFHSZ) located approximately 2.4 miles southeast of the Project Site near Covina Hills, and a VHFHSZ located approximately 2.6 miles northwest of the Project Site near the Santa Fe Dam. No construction or operational activity related to the proposed Project would create a significant wildfire risk. Therefore, the Project would not directly or indirectly expose people or structures to a significant risk involving wildland fires, and no impact would occur.

[34] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones Maps, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/, accessed April 5, 2022.

X. 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 may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site;	☐	☐	☒	☐
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	☐	☐	☒	☐
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?	☐	☐	☒	☐

Explanation of Checklist Responses

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

During Project construction, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, in compliance with CMC Section 8.50.100, the Project construction activities would be required to include implementation of an erosion and sediment control plan and BMPs to ensure that discharges of pollutants are effectively prohibited and would not cause or contribute to an exceedance of water quality standards. All construction and grading activities would be required to comply with applicable laws and regulatory documents, including all applicable city ordinances and the City's permit regulating discharges into and from the storm drain system. No operator of any construction activity would be allowed to begin until the City approves the erosion and sediment control plan. With the implementation of these regulatory compliance requirements, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant.

Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies and the specific pollutant(s) in the region referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site is located within and drains into the San Gabriel River Watershed,[35] which includes constituents of concern under California Clean Water Act Section 303(d) List (including copper, dioxin, nickel, dissolved oxygen, coliform bacteria, cyanide, lead, indicator bacteria, trash).[36] Project operations are not anticipated to increase concentrations of the constituents of concern for the San Gabriel River Watershed but would introduce sources of potential water pollution that are typical of hotel uses (e.g., sediment, nutrients, pesticides from runoff from landscaping areas, metals, pathogens, trash and debris, oil and grease). Stormwater runoff from precipitation could also potentially carry urban pollutants into municipal storm drains. Pursuant to CMC Section 8.5.120, the Project would be required to prepare a Low Impact Development (LID) plan such that post-construction stormwater would be retained at a volume of the greater of a 85th percentile storm event or the first 0.75-inch of stormwater runoff from a storm event (i.e., the stormwater quality design volume [SWQDv]). Under existing conditions, as provided in the Project's *Preliminary Hydrology/LID Memorandum* (**Appendix E** of this IS/MND), the Project Site is currently approximately 79 percent impervious and consists of buildings, surface parking, and minimal landscaped areas. With the Project, the impervious portion of the Project Site would increase to approximately 83 percent impervious area, which would result in increased surface runoff. As such, based on such site conditions, a deep drywell ground infiltration system is recommended as the most feasible BMP for the Project Site to address the pollutants in accordance with LID requirements, per the Preliminary Hydrology/LID Memorandum. This BMP

---

[35] County of Los Angeles Department of Public Works, San Gabriel River Watershed map, http://pw.lacounty.gov/wmd/watershed/sg/docs/SanGabrielRiver_wtrshed.pdf.

[36] Los Angeles Regional Water Quality Control Board, San Gabriel River Watershed Impaired Waters, https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/san_gabriel_river_watershed/impaired_waters.shtml, accessed June 25, 2022.

would retain 100 percent of the SWQDv on-site.[37] With implementation of the required BMP, impacts to surface water quality during operation of the Project would be less than significant.

Groundwater

There are no existing groundwater wells within the Project Site or vicinity.[38] In addition, based on the sample test borings at the Project Site, groundwater was not encountered during explorations that reached a depth of 50 feet. As described in the Geotechnical Evaluation, the CGS has mapped the likely historic highwater of the Project Site at a depth of approximately 175 feet, which is supported by well data from the County of Los Angeles.[39] As Project construction activities would include minimal grading and no excavation for subterranean levels, construction activities are not expected to encounter groundwater and temporary dewatering is not anticipated.

The most prominent type of operational activities from a development project that affect groundwater quality are typically spills of hazardous materials and leaking storage facilities and tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner in accordance with applicable regulatory requirements, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. As discussed above in Checklist Section IX and in the Phase I ESA, there are no underground storage tanks within the Project Site. Furthermore, the Project would not involve installation or operation of water/extraction wells, and the proposed drywell would filter stormwater prior to infiltration.

Based on the above, the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection. Therefore, Project impacts related to groundwater quality would be less than significant.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project Site is located within the Main San Gabriel Valley Groundwater Basin.[40] As discussed above, there are no existing groundwater wells within the Project Site or vicinity, and the Project construction activities would not require dewatering or other withdrawals of groundwater. In addition, the Project's operation would result in an increase in the amount of impermeable surfaces as compared with existing conditions (i.e., from approximately 79 percent to 83 percent). The Project's deep drywell ground infiltration system would retain 100 percent of the SWQDv on-site. Furthermore, the Project would not involve installation or operation of water/extraction wells, and the proposed drywell would filter stormwater prior to infiltration. Therefore, the Project would not decrease groundwater supplies or interfere

---

37 Rhyton Engineering, *Preliminary Hydrology/LID Memorandum, Avid Hotel – Covina*, March 23, 2023. See **Appendix E** of this IS/MND.

38 California Water Boards, GAMA Groundwater Information System, https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/, accessed June 25, 2022.

39 Duco Engineering, Geotechnical Evaluation Report, Proposed Hotel Development 578 N. Azusa Ave., August 24, 2022. See **Appendix C** of this IS/MND.

40 Main San Gabriel Basin Watermaster, Main San Gabriel Basin map, https://www.watermaster.org/basin-map, accessed June 26, 2022.

substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Project Site is not crossed by any water courses or rivers. During Project construction, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. Thus, as detailed above in Checklist Question X.a, in compliance with CMC Section 8.50.100, the Project construction activities would be required to include implementation of an erosion and sediment control plan and BMPs to ensure that discharges of pollutants are effectively prohibited and would not cause or contribute to an exceedance of water quality standards. All construction and grading activities would be required to comply with applicable laws and regulatory documents, including all applicable City ordinances and the City's permit regulating discharges into and from the storm drain system. During operation, the Project's drywell ground infiltration system would address drainage flows and would ensure that siltation does not occur. With the implementation of regulatory compliance requirements, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site?

Less Than Significant Impact. According to the Preliminary Hydrology/LID Memorandum, a large portion of the existing site drains towards the existing public alley gutter, while two small tributary sub-areas drain into the Azusa Avenue and Glentana Streets gutters. The uncontrolled sheet flow to the alley is conveyed to the Glentana Street gutter. During operation, the drainage would flow in a westerly direction for flood control purposes. As indicated above, while the impervious areas of the Project Site would increase from approximately 79 percent to 83 with implementation of the Project, the proposed deep drywell ground infiltration BMP would retain 100 percent of the SWQDv stormwater volume on-site.[41] The dry well overflow drains would spill the extra runoff through the curb in Azusa Avenue to mimic existing drainage conditions.

In addition, there are no water courses or rivers within or immediately surrounding the Project Site that pose a flooding risk. Therefore, the Project would not be anticipated to substantially alter the existing drainage pattern of the site or area in a manner which would substantially increase the rate or amount of surface run-off in a manner which would result in flooding on- or off-site. As such, impacts would be less than significant.

[41] Rhyton Engineering, *Preliminary Hydrology/LID Memorandum, Avid Hotel – Covina*, March 23, 2023. See **Appendix E** of this IS/MND.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The Project Site is located within an urbanized area with existing infrastructure to support the site's stormwater drainage needs. As discussed above, in compliance with CMC Section 8.50.100, the Project construction activities would be required to include implementation of an erosion and sediment control plan and BMPs to ensure that discharges of pollutants are effectively prohibited and would not cause or contribute to an exceedance of water quality standards. All construction and grading activities would be required to comply with applicable laws and regulatory documents, including all applicable City ordinances and the City's permit regulating discharges into and from the storm drain system. During operation, the Project would result in an increase in the amount of impermeable surfaces as compared with existing conditions (i.e., from 79 percent to 83 percent). However, as described in the Preliminary Hydrology/LID Memorandum, the Project's drywell ground infiltration system would retain 100 percent of the SWQDv on-site.[42] Consequently, the Project would reduce the amount of stormwater runoff discharging into the existing storm drainage infrastructure compared to existing conditions. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, impacts would be less than significant.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The development of the Project would result in a slightly reduced volumetric flow rate when compared to existing conditions as a result of the implementation of BMPs under the LID Ordinance, but would otherwise maintain existing impervious surfaces and stormwater conveyance systems. As such, the Project would not substantially impede, alter or redirect flood flows. Furthermore, the Project Site is located within a non-special flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) that is outside areas that have at least a 0.2 percent annual chance of flooding (i.e., a 500-year floodplain).[43] In addition, as discussed above, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Thus, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would impede or redirect flood flows, and no impacts would occur.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed above, the Project Site is located within a non-special flood hazard area as mapped by the FEMA.

A tsunami is a sea wave, commonly referred to as a tidal wave, generated by an underwater seismic disturbance, such as sudden faulting or landslide activity. According to the City's Safety

---

[42] Rhyton Engineering, *Preliminary Hydrology/LID Memorandum, Avid Hotel – Covina*, March 23, 2023. See **Appendix E** of this IS/MND.

[43] Los Angeles County Department of Public Works, LA County FEMA MAP (FIRM) Viewer, Map 06037C1700F, https://apps.gis.lacounty.gov/dpw/m/?viewer=femafirmrevision, accessed June 26, 2022.

Element, since Covina is an inland community (approximately 40 miles east of the Pacific Ocean), the City would not be susceptible to experiencing tsunamis.[44]

Seiches are earthquake-induced waves in enclosed bodies of water, such as lakes or reservoirs, and are similar to the sloshing of water in a bucket or bowl when shaken or jarred. In reservoirs, dams can often be overtopped, sending large volumes of water on downstream areas. According to the City's Safety Element, due to the presence of the easterly, upstream Puddingstone Reservoir and Dam located east of the City, and because the City lies in a seismically active region, the City is theoretically susceptible to seiches, which would likely cause major flooding. Although the dam does not overlay any earthquake faults, the facility would nevertheless be vulnerable to failure from major seismic activity in an adjacent or distant area. Dam failure would result in major, hazardous flooding and soil erosion around Walnut Creek in Covina and other downstream communities. The Safety Elements proposes two courses of action to best prepare for potential seiche-related hazards or associated risks: 1) administer reasonable development standards for properties abutting the Walnut Creek, and 2) continue with ongoing emergency preparedness activities.[45] The Project Site itself is located approximately 4 miles west of the Walnut Creek area and approximately 5.5 miles west of the Puddingstone Reservoir and Dam. As such, due to the distance and development of urban areas with flood control infrastructure, the Project Site would not be at substantial risk of inundation from a seiche. Furthermore, as discussed for Checklist Question IX.f, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Project would not risk release of pollutants due to inundation from seiches, and impacts would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed in Checklist Question X.a, in compliance with CMC Section 8.50.100, the Project construction activities would be required to include implementation of an erosion and sediment control plan and BMPs to ensure that discharges of pollutants are effectively prohibited and will not cause or contribute to an exceedance of water quality standards. All construction and grading activities would comply with applicable laws and regulatory documents, including all applicable city ordinances and the City's permit regulating discharges into and from the storm drain system. No operator of any construction activity would be allowed to begin until the City approves the erosion and sediment control plan. Furthermore, during operation, pursuant to CMC Section 8.5.120, the Project would prepare a LID such that post-construction stormwater would be retained at a volume of the greater of a 85th percentile storm event or the first 0.75-inch of stormwater runoff from a storm event (i.e., the SWQDv). The Project would install a drywell infiltration system would address the pollutants in accordance with LID requirements. With the implementation of regulatory compliance requirements, the Project would not conflict with or obstruct implementation of a water quality control plan.

As described in Checklist Question X.b, the Project Site is located within the Main San Gabriel Valley Groundwater Basin. Pursuant to the Sustainable Groundwater Management Act of 2014 (SGMA), this basin was named as an adjudicated groundwater basin and is exempt from the requirements of developing a Groundwater Sustainability Plan and subsequently was designated

[44] City of Covina, Safety Element, 2000, Section III.
[45] City of Covina, Safety Element, 2000, Section III.

as a very-low-priority basin.[46] As such, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan.

Based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

[46] City of Covina, 2020 Urban Water Management Plan.

XI. 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?	☐	☐	☒	☐

Explanation of Checklist Responses

a. Would the project physically divide an established community?

No Impact. The Project would be located in an urbanized area, and the proposed uses would be consistent with the existing surrounding uses. Specifically, as detailed below, the Project's uses would be consistent with the uses permitted by General Commercial uses per the City's General Plan and those permitted by the C-3A Commercial Zone of the CMC with a conditional use permit. In addition, while the Project would relocate an existing alley to less than 100 feet to the east within the Project Site, the relocated alley would still provide ingress and egress along Glentana Street (a dead-end street to the east). Furthermore, all proposed development would occur within the boundaries of the Project Site. Therefore, the Project would not physically divide an established community, and no impact would occur.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The following discussion addresses the Project's consistency with the requirements and policies of the various local plans and regulatory documents that guide development in the City and that were adopted at least in part to avoid or reduce the environmental effects of development, including the General Plan, CMC, and SCAG 2020-2045 RTP/SCS.

The Project Site is designated as General Commercial by the City's General Plan and is zoned C-3A Commercial Zone (Regional or Community Shopping Center).[47] The General Plan Land Use Element refers to General Commercial as an array of uses and building types, including retail, office, services, and those permitted in the Zoning Code. Such uses should be provided in various districts of the City and generally along the major streets or at primary street intersections. Per CMC Section 17.42.030, the C-3A zone permits hotel uses with a conditional use permit. In addition, General Commercial uses should have a maximum FAR of 1.5. The Project would be

[47] City of Covina, General Plan Land Use Element, 2000; City of Covina, Zoning Map, https://covinaca.gov/sites/default/files/fileattachments/planning_commission/page/1071/zoning_wall.pdf, accessed March 17, 2023.

consistent with such provisions by providing permitted hotel uses with a conditional use permit and resultant FAR of 0.82:1. Furthermore, the Project would be located along Azusa Avenue, which is identified as a primary arterial within the City by the General Plan Land Use map.

CMC Section 17.62.027 specifies that such permitted hotel use shall meet specific standards such as those related to design, setbacks, parking and circulation, landscaping, and amenities. Specifically, each hotel shall have at least 25 rooms, and no room shall be less than 280 square feet. Based on the proposed Planned Community Development Overlay, however, the Project would provide 68 hotel rooms that would range from 218 square feet to 370 square feet. The proposed hotel lobby would be 1,900 square feet, which would meet the code requirement that the lobby shall be at least 300 square feet plus 25 square feet for each five rooms. The lobby would also be designed so as to be conveniently accessible to all entrances and corridors. CMC Section 17.62.027 also provides specific setback provisions for such uses that abut or are adjacent to nonresidential-zoned properties. As such, the building would be required to have a setback of 25 feet in the front, 20 feet at the street-facing sides, and 25 feet at the rear. However, with the establishment of a Planned Community Development Overlay for the Project, the following setbacks would be provided: 77 feet from the north; 8 feet, 6 inches to 20 feet, 2 inches from the street-facing south; 33 feet from the east; and 18 feet, 3 inches to 25 feet, 7 inches from the street-facing west. Pursuant to CMC Section 17.62.027, a hotel development within a C-3A zone would be subject to the landscaping requirement that a minimum 10 percent of the total site shall be landscaped. The Project would comply by providing 6,329 square feet of landscaped area, or approximately 17 percent of the Project Site. With regard to parking, the Project would provide 55 vehicle parking spaces on the ground level and would seek a variance of the 68 spaces required by the CMC. Of the 55 spaces, two would be ADA compliant, four would be designated for electric vehicles, and six would be designated for clean air vehicles. In addition, although not required by the CMC, the Project would provide four bicycle parking spaces. Overall, with City approval of the Project's discretionary actions and proposed Planned Community Development per Chapter 17.58 of the CMC, the Project would be consistent with all applicable provisions of the General Plan and CMC adopted for the purpose of avoiding or mitigating an environmental effect.

In addition, as detailed in Checklist Section VIII, Greenhouse Gas Emissions, of this IS/MND, the Project would comply with the plans, policies, regulations and GHG reduction actions/strategies outlined in SCAG's 2020-2045 RTP/SCS, CARB's 2022 Scoping Plan, and the City's EAP. The Project is located within a TPA in proximity to transit options and accessible by walking and biking, which would support the reduction in vehicle miles travelled (VMT) and associated GHG emissions. Furthermore, the Project would comply with sustainable practices required by the 2022 Title 24 standards and CALGreen Code and may include the use of all electric landscape maintenance equipment, high-efficiency lighting, energy-efficient appliances, low-flow fixtures, and water-efficient irrigation.

With regard to historical resources, as concluded under Checklist Question V.a, no historical resources as defined by CEQA Section 15064.5(a) or CMC Chapter 17.81 were identified within the Project Site as a result of the SCCIC records search; literature, map, and aerial photo review; historical society consultation; pedestrian survey; and California and City Register evaluations. As such, the Project would not conflict with applicable regulations adopted for the purposes of avoiding or mitigating effects related to historical resources.

XII. 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?	☐	☐	☐	☒

Explanation of Checklist Responses

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. As described in the General Plan's Natural Resources and Open Space Element, the City does not include mining activities and none are expected in the future because of Covina's built-out character, land use restrictions, and the potentially negative environmental and "quality of life" impacts (e.g., noise, dust, and heavy truck traffic) typically associated with such operations.[48] The Natural Resources and Open Space Element also indicates that per the Department of Conservation's California Geologic Emergency Management Division (CalGEM), there are no significant energy-producing minerals or oil, gas, or geothermal fields within the City. The nearest oil well to the Project Site is located 2.3 miles east; however, this well has been categorized as a dry well and has been plugged, as reported by CalGEM.[49] No other types of mineral resources are identified on or near the Project Site in the City's General Plan. As a result, the Project would not 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, and no impact would occur.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As discussed above and in the General Plan's Natural Resources and Open Space Element, CalGEM has indicated that there are no significant energy-producing minerals or oil, gas, or geothermal fields within the City.[50] The City does not delineate mineral resources zones. Therefore, the Project Site is not a mineral resource recovery site, and no impact would occur.

---

48 City of Covina, General Plan, Natural Resources and Open Space Element, 2000, Section II.
49 California Department of Conservation, Well Finder CalGEM GIS, https://maps.conservation.ca.gov/doggr/wellfinder/, accessed April 5, 2022.
50 City of Covina, General Plan, Natural Resources and Open Space Element, 2000, Section II.

XIII. 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, exposure of people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Explanation of Checklist Responses

The following analysis is based on field noise measurements collected on-site, hereinafter referred to as the Noise Data, and included as **Appendix F** of this IS/MND.

Noise Fundamentals

Noise is generally defined as unwanted sound, and sound becomes unwanted when it interferes with normal activities or when it causes actual physical harm, including adverse effects on health. Sound pressure levels are used to measure the intensity of sound and are described in terms of decibels. The decibel (dB) is a logarithmic unit which expresses the ratio of the sound pressure level being measured to a standard reference level. A-weighted decibels (dBA) approximate the subjective response of the human ear to a broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear.

Noise equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in dBA. The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. The peak traffic hour L_{eq} is the noise metric used by the California Department of Transportation (Caltrans) for all traffic noise impact analyses.

The Day-Night Average Level (L_{dn}) is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 10 decibels to sound levels at night between 10:00 p.m. and 7:00 a.m. The Community Noise Equivalent Level (CNEL) is similar to the L_{dn}, except that it has another addition of 4.77 decibels to sound levels during the evening hours between 7:00 p.m. and 10:00 p.m. These

additions are made to the sound levels at these time periods because during the evening and nighttime hours, when compared to daytime hours, there is a decrease in the ambient noise levels, which creates an increased sensitivity to sounds. For this reason, the sound appears louder in the evening and nighttime hours and is weighted accordingly.

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks, and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Mobile transportation sources, such as highways, and hard and flat surfaces, such as concrete or asphalt, have an attenuation (reduction) rate of 3.0 dBA per doubling of distance from the source. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by point sources typically attenuate at a rate of approximately 7.5 dBA per doubling of distance.[51] Construction noise levels are assumed to average 6 dBA of attenuation per doubling of distance from the source.[52]

Human response to sound is highly individualized. Annoyance is the most common issue regarding community noise. The percentage of people claiming to be annoyed by noise generally increases with the environmental sound level. However, many factors influence people's response to noise, such as the character of the noise, the variability of the sound level, the presence of tones or impulses, and the time of day. Additionally, non-acoustical factors, such as the person's opinion of the noise source, the ability to adapt to the noise, the attitude toward the source and those associated with it, and the predictability of the noise, all influence people's response. As such, response to noise varies widely from one person to another, and with any particular noise, individual responses would range from "not annoyed" to "highly annoyed."

Covina Municipal Code

City-specific standards for noise are set forth in CMC Title 9, Chapter 9.40, Noise, referred to and cited as the "Covina Noise Ordinance." The Covina Noise Ordinance serves to protect people from non-transportation noise sources such as construction activities, commercial operations, machinery, and nightlife. The applicable sections are presented below.

Section 9.40.030, Loud party. This section includes examples of prohibited noises. Specifically, it reads: *It is unlawful for any person or persons to make, continue, or cause to be made or continued any unnecessary, loud or unusual noise which is a threat to the public peace, health, safety or general welfare of others due to a party, gathering or unruly assemblage at a premises.*

The noise standards for such activities (as well as other activities found to be disturbing per CMC Section 9.40.080, General Guidelines) is dependent upon the associated land uses, as shown in Table XIII-1, *Exterior Noise Level Limits*.

Section 9.40.040, Exterior noise level limits. This section establishes the exterior allowable sound level limit for residential, commercial, and industrial properties.

---

[51] United States Nuclear Regulatory Commissions, *Biological Assessment Preparation Advanced Training Manual Version 02-2012, 7.0, Construction Noise Impact Assessment*, 2012.

[52] Federal Highway Administration, *FHWA Highway Construction Noise Handbook Final Report*, August 2006.

Table XIII-1
Exterior Noise Level Limits

Receiving Land Use Category	Time	Sound Level (A-Weighted) Decibels
Residential estate or agricultural	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 40
Residential low density	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 45
Residential medium and high density	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 50
Commercial	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 55
Industrial	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	70 60
Source: City of Covina, Covina Municipal Code, Section 9.40.040 (B).		

Section 9.40.060, Interior noise level limits. This section also prohibits a commercial or industrial development to be constructed in an area adjacent to residential properties that will increase noise levels above the standards listed in this section and CMC 9.40.040, unless the developer provides mitigation measures to reduce the increased noise levels. Prior to the issuance of building permits for such a project, a registered engineer shall certify that the construction plans provide for noise reduction features. In addition, prior to occupancy, a random selection of adjacent residential units shall be tested to provide evidence that all required noise levels are achieved.

Section 9.40.110, Construction. This section prohibits the performance of construction work within a radius of 500 feet from any residential land use category between the hours of 8:00 p.m. and 7:00 a.m. on weekdays and Saturdays, at any time on any Sunday, or at any time on public holidays, without an approved permit. Specifically, it reads:

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

   "Public holiday" as used in this subsection shall mean the day upon which each of the following holidays is recognized and celebrated as a holiday by the employees of the city: Independence Day, Labor Day, Veterans Day, Thanksgiving, Christmas Eve, Christmas Day, New Year's Eve, New Year's Day, Washington's Birthday, Memorial Day, or any other holiday recognized as such by the city.

B. *A permit may be issued authorizing the work prohibited by this section whenever it is found that the public interest will be served thereby. An application for such a permit shall be in writing and shall be accompanied by an application fee in an amount that may be set from*

time to time by a resolution of the city council. The application shall set forth in detail facts showing that the public interest will be served by the issuance of such permit, and the application shall be made to the planning division of the community development department. The chief planning official shall be responsible for the administration and enforcement of the provisions of this section and shall have the authority to issue such permits. He/she shall coordinate the processing of each application for a permit with such departments and divisions as he/she deems will be affected by the issuance of the permit.

Section 9.40.120, Subsection J, Loud and unusual noises. This section prohibits the operation of any device that creates a vibration above the vibration perception threshold of an average individual, at or beyond the property boundary of the source if on private property, or at 150 feet from the source if on a public space or public right-of-way. The "vibration perception threshold" is defined as the minimum ground or structure-borne vibrational motion necessary to cause a normal person to be aware of the vibration by such direct means as (but not limited to) sensation by touch or visual observation of moving objects. Pursuant to CMC Section 9.40.020 (30), the threshold shall be presumed to be a motion velocity of 0.01 inches/second.

Section 9.40.140, Exceptions. This section exempts several noise sources from the noise standards and provisions. Relevant noise sources include lawn equipment, the maintenance of real property, and operation of garbage trucks, and street sweepers.

Nearest Sensitive Receptors and Existing Noise Conditions

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptor to the Project Site is the multifamily residence located approximately 180 feet east of the Project Site. It should be noted that existing vacant (landscaped) land and a structure supporting office and commercial uses are located between the Project Site and this residential structure. Although not considered as a sensitive use, the nearest structure to the Project Site is an industrial structure (previously Payne Magnetics Inc.), adjoining the Project Site to the north.

To determine the existing noise levels, noise measurements were taken in the vicinity of the Project Site. The 10-minute noise measurements were recorded between 10:00 a.m. and 12:00 p.m. on May 18, 2022. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day. The noise measurements were taken during "off-peak" (9:00 a.m. through 3:00 p.m.) traffic noise hours as this provides a more conservative baseline. During rush hour traffic, vehicle speeds and heavy truck volumes are often low. Free-flowing traffic conditions

just before or after rush hour often yield higher noise levels.[53] The results of the noise level measurements are presented in Table XIII-2, *Existing (Ambient) Noise Level Measurements*.

Table XIII-2
Existing (Ambient) Noise Level Measurements

No.	Measurement Location Description	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Start Time
1	In front of 815 Glentana Street	50.1	44.1	69.5	89.2	10:28 a.m.
2	Alley between Fred Loyal Insurance and Monstrous Pizza, east side of 688 North Rimsdale Avenue	52.5	47.0	68.8	88.0	11:08 a.m.
Source: Noise Measurement Data; see **Appendix F** of this IS/MND.						

Existing ambient noise is generated primarily by vehicle traffic along North Azusa Avenue, which bounds the Project Site to the west, and by existing commercial uses to the north and east of the site. Other sources of peak noise include occasional bird chirping. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I (precision) sound level meters. Refer to **Appendix F** of this IS/MND for results of the field measurement.

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. The following sections evaluate the noise sources and levels associated with the temporary construction activities and long-term operations of the proposed Project and compares the noise levels to the City standards.

Short-Term Construction Impacts

Construction of the proposed Project would occur over approximately 11 months and would include demolition, grading, building construction, paving, and architectural coating phases. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in Table XIII-3, *Maximum Noise Levels Generated by Typical Construction Equipment*. It should be noted that the noise levels identified in Table XIII-3 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical

[53] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

disturbance would be due to random incidents, which would last less than one minute (such as placing down large pieces of equipment or the hydraulic movement of machinery lifts).

Table XIII-3
Maximum Noise Levels Generated by Typical Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	Reference L_{max} at 50 Feet (dBA)[2]	L_{max} at 180 Feet (dBA)[3]
Backhoe	40	78	67
Compressor	40	78	67
Concrete Mixer Truck	40	79	68
Concrete Saw	20	90	79
Crane	16	79	68
Dozer	40	82	71
Forklift	40	78	67
Generator	50	81	70
Grader	40	85	74
Loader	40	79	68
Paver	50	77	66
Roller	20	80	69
Tractor	40	84	73
Welder	40	74	63

Note:
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.
2. These noise levels represent the A-weighted maximum sound level (L_{max}) measured at a distance of 50 feet from the construction equipment.
3. The nearest sensitive receptor (i.e., multifamily residence to the east) is located approximately 180 feet from the Project boundary.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

Adjacent sensitive receptors may be exposed to elevated noise levels during Project construction. The nearest sensitive receptor (i.e., multifamily residence to the east) is located approximately 180 feet from the Project boundary. At this distance, construction noise levels could range between approximately 63 dBA and 79 dBA; refer to Table XIII-3. It should be noted that an existing vacant (landscaped) land and a structure supporting office and commercial uses are located between the Project Site and the multifamily structure. Due to the distance and the existing structure completely blocking the line-of-sight between the closest residences and the Project Site, noise generated from Project construction on-site would be further screened and attenuated.

Although sensitive receptors may be exposed to increased noise levels during Project construction, construction activities are excluded from the City's exterior noise thresholds (Table XIII-1) as it is a normal part of urban life and the Project would be required to comply with the City's allowable construction hours. Covina Noise Ordinance Section 9.40.110, Construction, prohibits the performance of construction work within a radius of 500 feet from any residential land use category between the hours of 8:00 p.m. of any day and 7:00 a.m. of the next day, at any time on any Sunday or at any time on any public holiday, without an approved permit. Project compliance with these restrictions is considered sufficient to prevent significant construction noise impacts. To further reduce the level of temporary impacts at neighboring residential uses, **Mitigation Measure NOI-1** would require all construction equipment to be equipped with properly operating and maintained mufflers, stationary construction equipment to be located so that

emitted noise is directed away from the nearest noise-sensitive receptors, equipment staging to be located in areas farthest away from sensitive receptors, and haul truck deliveries to be limited to the same hours specified for construction equipment (7:00 a.m.–8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays). Compliance with **Mitigation Measure NOI-1** would reduce construction noise impacts at nearby sensitive receptors, and would reduce impacts to less than significant.

Construction Trips Noise Impacts

Construction activities would also cause increased noise along access routes to and from the site due to movement of equipment and workers, as well as haul trips. According to the CalEEMod defaults, it is anticipated that project construction would generate a maximum of 20 hauling trips per day, 25 worker trips per day, and 10 vendor trips per day. As a result, mobile source noise would increase along access routes to and from the Project Site during construction. However, mobile traffic noise from construction trips would be temporary and would cease upon Project completion.

According to Caltrans, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA).[54] The Project's construction trips would not double existing traffic volumes and any increase in traffic noise levels would thus be imperceptible. Therefore, short-term haul truck noise impacts from construction traffic would be less than significant.

Operational Noise Sources

Potential noise impacts associated with the operations of the proposed Project would be from Project-generated vehicular traffic on the nearby roadways and from on-site activities, which have been analyzed separately below.

Off-Site Mobile Noise

The proposed Project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. As stated, a doubling in roadway traffic volumes is required to generate any noticeable increase (i.e., 3 dB) in roadway noise levels. Based on the Transportation Memo included as **Appendix G** of this IS/MND, the Project would generate 543 daily trips on weekdays and 549 average daily trips on the weekend (Saturday). According to the City's *Engineering and Traffic Survey*, existing average daily traffic along Azusa Avenue is approximately 21,915 vehicles per day.[55] As such, the Project's trip generation would not double existing traffic volumes along nearby roadways and an increase in traffic noise along local roadways would be imperceptible. Project-related traffic noise impacts would be less than significant.

Stationary Noise

The Project proposes to demolish two existing commercial buildings and construct a three-story hotel building with 68 rooms and 55 vehicle parking spaces on the ground level. Stationary noise

[54] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.
[55] Willdan Engineering, *Engineering and Traffic Survey for the City of Covina*, March 2016.

sources associated with the Project would include the operation of mechanical equipment and parking activities from hotel guests.

Slow-Moving Trucks

The Project proposes a hotel development that would necessitate occasional garbage and truck delivery operations. Typically, a medium truck with speed of 50 miles per hour can generate a maximum noise level of 79 dBA at a distance of 49 feet.[56] These are levels generated by a truck that is operated by an experienced "reasonable" driver with typically applied accelerations. The garbage and delivery trucks would operate at lower speed with lower noise levels. Higher noise levels may be generated by the excessive application of power. Lower levels may be achieved but would not be considered representative of a normal truck operation. The Project is not anticipated to require a significant number of truck deliveries. Garbage and delivery trucks currently service the surrounding area, and thus would not introduce a new source of noise to the site vicinity. As such, impacts would be less than significant.

Mechanical Equipment Noise

An HVAC unit would be installed on the roof of the proposed three-story hotel building. The nearest sensitive receptor is the multifamily residence located approximately 180 feet east from the proposed HVAC unit. Typically, noise generated from HVAC unit operations is approximately 66 dBA at 3 feet.[57] Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law of sound propagation. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source.[58] At a distance of 180 feet,[59] noise from the proposed HVAC unit would be approximately 30 dBA and would not exceed the City's noise standard for medium- and high-density residential land use (60 dBA during the day and 50 dBA during the night; refer to Table XIII-1) at the multifamily residence to the east. Additionally, it should be noted that noise emanating from the HVAC unit is common in urban settings and is exempt from the provisions of the Noise Ordinance, as detailed in CMC Section 9.40.140, Exceptions. As such, the proposed Project would not result in significant noise impacts to nearby sensitive receptor from HVAC units. Impacts would be less than significant.

Parking Activities Noise

The Project would include 47 surface parking spaces to the north and 8 just east of the proposed hotel building. Estimates of the maximum noise levels associated with the parking activities are presented in Table XIII-4, *Typical Noise Levels Generated by Parking Related Activities*.

---

56 Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.

57 Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.

58 Cyril M. Harris, *Noise Control in Buildings*, 1994.

59 The horizontal distance between the sensitive receptor and the Project is used for a conservative analysis. In reality, the HVAC unit would be located farther from the receptor as it would be on a roof of the proposed three-story building, which is designed to reach a maximum height of 35 feet as currently proposed.

Table XIII-4
Typical Noise Levels Generated by Parking Related Activities

Noise Source	L_{max} at 50 Feet (dBA)[1]	L_{max} at 180 Feet (dBA)[3]
Car door slamming	61 dBA L_{eq}	50 dBA L_{eq}
Car starting	60 dBA L_{eq}	49 dBA L_{eq}
Car idling	53 dBA L_{eq}	42 dBA L_{eq}
Notes: 1. These noise levels represent the A-weighted maximum sound level (L_{max}) measured at a distance of 50 feet from the construction equipment. 2. The nearest sensitive receptor (i.e., multifamily residence to the east) is located approximately 180 feet from the Project boundary.		
Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.		

As shown in Table XIII-4, parking activities can result in noise levels up to 50 dBA at a distance of 180 feet. It is noted that parking activity noises are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking activities would be far lower than what is identified in Table XIII-4. Parking in the surface parking lot would have intermittent parking-related noise due to the movement of vehicles. While the existing multifamily residence to the east (sensitive receptor) may be exposed to intermittent parking lot noise, this noise would be partially masked by background noise from traffic along Azusa Avenue, and further screened and attenuated by the existing vacant (landscaped) land and the office/commercial structure that is located between multifamily residence and the Project Site.

As surface parking lots are typical of an urban environment and present in the Project vicinity, parking activities on-site during Project operation would not result in substantially greater noise levels in the vicinity compared to the existing conditions. Overall, long-term operational noise impacts would be less than significant.

Outdoor Gathering Area Noise

The Project would include a covered outdoor seating area facing Glentana Street. This outdoor gathering area has the potential to be accessed by groups of people intermittently for various occasions (e.g., private parties, events, and other social gatherings). Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation (physical positioning) of the crowd members. Crowd noise is estimated at 60 dBA at 1 meter (3.28 feet) away for raised normal speaking.[60] This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members. Therefore, crowd noise would be approximately 62 dBA at 1 meter from the source.

The covered outdoor seating area would be approximately 225 feet from the nearest sensitive receptor (i.e., multifamily residence to the east). At a distance of 225 feet,[61] noise from the proposed outdoor area would be approximately 25 dBA and would not exceed the City's noise standard for medium- and high-density residential land use (60 dBA during the day and 50 dBA during the night; refer to Table XIII-1) at the multifamily residence to the east. It should be noted

[60] M. J. Hayne, R. H. Rumble, and D.J. Mee, "Prediction of Crowd Noise," *Acoustics*, November 2006.
[61] Cyril M. Harris, *Noise Control in Buildings*, 1994.

that the proposed outdoor seating area would be separated from the multifamily residence by proposed surface parking, a new driveway, and the existing vacant (landscaped) land to the east. As such, noise generated from Project construction would be further screened and attenuated. Impacts would be less than significant in this regard.

> **Mitigation Measure NOI-1:** To reduce noise impacts due to construction activities, the Project applicant shall demonstrate, to the satisfaction of the City of Covina Community Development Director, that the Project complies with the following:
>
> - Prior to approval of grading plans and/or issuance of building permits, Project plans and specifications shall include a note indicating that noise-generating construction activities shall only occur between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, with no activity allowed on Sundays or public holidays, per Covina Noise Ordinance Section 9.40.110. The construction supervisor shall ensure compliance with the Project plans and specifications, and the City of Covina shall conduct periodic inspections, at its discretion.
> - Prior to initiation of construction, the contractor shall demonstrate to the City of Covina Community Development Director that equipment is properly muffled, shielded and maintained. During all Project construction, the construction contractor shall ensure that power construction equipment (including combustion or electric engines), fixed or mobile, shall be equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of construction of the proposed Project. The combination of muffling devices and noise shielding shall be capable of reducing noise by at least 5 dBA from non-muffled and shielded noise levels. All equipment shall be properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.
> - The construction contractor shall locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest to the Project Site during all construction activities.

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

Less Than Significant. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of some heavy-duty construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that significantly damage structures.

The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Project construction would involve the use of typical construction equipment and would not involve

heavy-duty equipment capable of generating excessive vibration impact. Construction for the Project (approximately 11 months) would be short term and vibration-generating equipment would not stay in one place. As such, this analysis focuses on building damage.

Typical vibration produced by construction equipment is illustrated in Table XIII-5, *Typical Vibration Levels for Construction Equipment*.

Table XIII-5
Typical Vibration Levels for Construction Equipment

Equipment	Reference Approximate Peak Particle Velocity at 25 Feet (inch/second)	Approximate Peak Particle Velocity at 180 Feet (inch/second)[1]
Large bulldozer	0.089	0.0046
Loaded trucks	0.076	0.0039
Jackhammer	0.035	0.0018
Small bulldozer	0.003	0.0002

Notes:
1. The nearest sensitive receptor (i.e., multifamily residence to the east) is located approximately 180 feet from the Project boundary.
   Calculated using the following formula:
   $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
   where: PPV (equip) = the peak particle velocity in inch-per-second of the equipment adjusted for the distance; PPV (ref) = the reference vibration level in inch-per-second from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual;* D = the distance from the equipment to the receiver.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. Table 7-4 *Vibration Source Levels for Construction Equipment.*

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. For non-engineered timber and masonry buildings (i.e., most residential structures), the FTA architectural damage criterion for continuous vibrations is 0.2 inch-per-second. The nearest sensitive receptor would be the multifamily residence located approximately 180 feet from proposed construction areas. As shown in Table XIII-5, vibration velocities from heavy construction equipment operations typically used during construction range from 0.0002 to 0.0046 inch-per-second PPV at 180 feet. Therefore, vibration from construction equipment vibration would not exceed the FTA architectural damage criterion for residential buildings and building damage would not occur at the nearest sensitive receptor. Impacts would be less than significant.

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 exposure of people residing or working in the project area to excessive noise levels?

No Impact. The nearest public use airport to the Project Site is the Brackett Field Airport, located approximately 6.5 miles east. Additionally, the Project Site is not in the vicinity of a private airstrip. Therefore, no impact would occur.

XIV. 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?	☐	☐	☐	☒

Explanation of Checklist Responses

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

Less Than Significant Impact. The Project includes the development of a 68-room hotel with the employment of 15 hotel staff. As discussed in Checklist Section XI, Land Use and Planning, of this IS/MND, the proposed hotel uses would be consistent with the permitted land uses on-site. No housing units would be developed as part of the Project, and no new or expanded urban infrastructure would be constructed that could foster increased development intensity on-site or at surrounding properties. Similar to other construction projects in the region, the Project construction workers are expected to be drawn from the large, available regional labor force, who would commute to the Project Site during the estimated 11-month construction period. As such, the Project would not induce construction employees to move to the Project vicinity. During operation, the Project would provide short-term stays for guests and would not provide long-term residences. Under existing conditions, the Project Site is occupied by a 6,221-square-foot building and a 485-square-foot building with commercial uses, which are estimated to employ approximately 33 employees.[62] The Project would require 15 employees, which would be a net reduction of employees on-site. As the Project's employment opportunities would be nominal and likely filled by individuals who already reside in the area, the Project's employment opportunities would be within the planned growth for the City. Therefore, the Project would not induce substantial unplanned population growth in the City, and impacts would be less than significant.

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

No Impact. The Project Site does not currently provide housing and is zoned for commercial uses. Construction or operation of the Project would not displace any people or housing. Thus, the Project would not necessitate the construction of replacement housing elsewhere, and no impact would occur.

[62] (6,706 square feet) × (0.0047897 employees per square foot) = approximately 33 employees, based on the Covina-Valley Unified Developer Fee Justification Study, September 7, 2021.

XV. PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

Explanation of Checklist Responses

a.i) 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 fire protection services?

Less Than Significant Impact. The City of Covina, which is served by Los Angeles County Fire Department (LACoFD) Battalions 2 and 16 in Division II, has three fire stations: Station 152 at 807 West Cypress Avenue (approximately 0.38 miles northeast of the Project Site); Station 154 at 401 North Second Avenue (approximately 1.1 miles southeast of the Project Site); and Station 153 at 1577 East Cypress Avenue (approximately 2.9 miles northeast of the Project Site).[63] LACoFD services include fire suppression, emergency medical service (paramedics), hazardous materials, health hazmat, urban search and rescue, lifeguard services, K-9 (search and arson), fire & rescue helicopters, and large animal rescue operations.[64] According to CalFire, the Project Site is not located within a Fire Hazard Area or a state responsibility area.[65] During construction

[63] City of Covina, Fire Department & Paramedic Services, https://covinaca.gov/administration/page/fire-department-paramedic-services, accessed June 30, 2022.
[64] City of Covina, Adopted Budget FY 2021–22.
[65] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones Maps, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/, accessed April 5, 2022.

of the Project, staging would occur within the Project Site. Access to and along Azusa Avenue adjacent to the Project Site would remain unobstructed, and Glentana Street would remain accessible to emergency vehicles. During operation, as the Project would not develop residential uses, the Project would not generate a permanent residential service population. While the Project would result in an estimated net reduction of 18 employees on-site, the Project's hotel uses would introduce short-term guests on-site. As such, the Project would have an increased demand of fire protection services when compared to existing conditions. However, the Project would be required to comply with the California Fire Code, which the City has adopted by reference per CMC Section 14.12.010. The City of Covina's fire suppression, prevention, education, permitting/planning, and inspection services are provided pursuant to a contract with the LACoFD.[66] Specifically, the Project would comply with LACoFD requirements related to fire sprinkler systems, fire flow, fire alarms, and emergency access. Adequate access for emergency vehicles to Azusa Avenue would be provided by a new Project driveway. While the Project would not propose changes within major public streets such as Azusa Avenue, the Project would relocate an existing alley less than 100 feet to the east within the Project Site. The relocated alley would still provide ingress and egress along Glentana Street, which is a dead-end street to the east (i.e., not an evacuation route). Furthermore, the Project would be required to undergo site plan review and obtain approval from the City to verify that the Project complies with all applicable safety and access requirements. Furthermore, in *City of Hayward v. Board of Trustees of California State University Ruling* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection, and that it is reasonable to conclude that the City will comply with that provision to ensure that public safety services are provided.[67] Therefore, the Project is not anticipated to affect fire protection demands to the extent that new or physically altered fire facilities would be required. Impacts on fire protection services are anticipated to be less than significant.

a.ii) 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 police protection services?

Less Than Significant Impact. The Covina Police Department (CPD) employs 99 personnel to provide full public safety services to the City's 48,619 citizens over a 7-square-mile area.[68] The department is located at 444 N. Citrus Avenue, approximately 1.1 miles east of the Project Site. Specifically, the Project Site is located within the CPD West Service Area.[69] As the Project does not involve the development of housing, the Project would not increase the permanent service population on-site and law enforcement demands from the Project Site. The Project would generate 15 employees (a net reduction of 18 employees) and short-term hotel guests on-site. During construction, the Project Site would implement temporary security measures, such as fencing, lighting, and locked entry to secure the site. During operation, the Project would include surveillance security devices and safety lighting in interior and exterior areas of the Project. In addition, as with other projects, the Project would be required to pay any development fees and local taxes, which would support any expansion of police protection services that may be required

66 City of Covina, Adopted Budget FY 2021–22.
67 *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, 843, 847.
68 City of Covina, Adopted Budget FY 2021–22.
69 City of Covina, Service Area Policing, https://covinapd.org/operations-division/#service-area-policing, accessed July 28, 2022.

based on growth within the City. However, no capital improvements related to police services within the City are currently being planned.[70] Furthermore, in *City of Hayward v. Board of Trustees of California State University Ruling* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[71] Therefore, the Project is not anticipated to affect police protection demands to the extent that new or physically altered police protection facilities would be required. Impacts on police protection services are anticipated to be less than significant.

a.iii) 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 schools?

No Impact. The Project Site is located within the Covina-Valley Unified School District and is served by Workman Elementary School (grades K-5), Traweek Middle School (grades 6-8), and Covina High School (grades 9-12).[72] The Project would provide hotel uses and would not house residents that could, in turn, generate school students. In addition, under existing conditions, the Project Site is occupied by a 6,221-square-foot building and a 485-square-foot building with commercial uses, which are estimated to currently provide approximately 33 employees.[73] The Project would provide 15 employment opportunities; thus, the Project would result in a net reduction of 18 employment opportunities and would not result in a new student population from the Project Site. Furthermore, the Project would be subjected to levied developer fees applicable to both new construction and reconstruction projects, pursuant to Education Code Section 17620, to support school facilities. The Project is not anticipated to create demands on public school facilities to the extent that new or physically altered facilities would be required. Therefore, no impact would occur.

a.iv) 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 parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are operated and maintained by the City of Covina Parks & Recreation Department. Nearby parks and recreational facilities include Covina Park at 301 4th Avenue (0.71 miles southeast); Edna Park at 220 W. Edna Place (0.84 miles northeast); Hollenbeck Park at 1250 N. Hollenbeck Avenue (0.93 miles northeast); Heritage Plaza Park at 400 N. Citrus Avenue (1 mile east); Cougar Park at 150 W. Puente Street (1.1 miles southeast); Covina Senior and the Community Center at 815

---

70 City of Covina, Capital Improvement Program, Fiscal Year 2022. The Capital Improvement Program (CIP) is a projection of the City's capital investments over a five-year period.

71 *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

72 Covina-Valley Unified School District, School Locator, http://apps.schoolsitelocator.com/?districtCode=75922&address=578%20n%20azusa%20ave, accessed April 6, 2022.

73 (6,706 square feet) × (0.0047897 employees per square foot) = approximately 33 employees, based on the Covina-Valley Unified Developer Fee Justification Study, September 7, 2021.

N. Barranca Avenue (1.4 miles northeast), and Kelby Park at 815 Barranca Avenue (1.47 miles northeast).[74]

As discussed above, the Project proposes the development of a 68-room hotel and employment of 15 hotel staff. The Project would also provide an indoor fitness area and outdoor patio area on-site for use by hotel guests. The Project would not develop residential uses and would not increase demands for park facilities from permanent residents. As such, the Project would not affect the City's current parkland to population ratio of 1.3 acres of open space for each 1,000 residents.[75] In addition, as described above, the Project would result in a net reduction of employees on-site. During Project construction and operation, employees would be anticipated to use the parks near their homes during non-work hours. As such, the demand that employees would have on parks would not increase when compared to existing conditions. Furthermore, the Project would provide short-term stays for hotel guests and would not provide long-term residences. Thus, any demand for usage of parks by hotel guests would be negligible. Overall, the Project is not anticipated to create new or additional demands to the extent that new or physically altered parks would be required. Therefore, impacts would be less than significant.

a.v) 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 other public facilities?

Less Than Significant Impact. The Covina Public Library provides library services to the City from its location at 234 N. Second Avenue, approximately 1.15 miles southeast of the Project Site. As discussed above, the Project's hotel uses would result in a net reduction of employees on-site. During Project construction and operation, employees would be anticipated to use the libraries or near their homes during non-work hours. As such, the demand that employees would have on libraries would not increase when compared to existing conditions. In addition, the Project would provide short-term stays for hotel guests and would not provide long-term residences. Thus, any demand for usage of libraries by hotel guests would be negligible. Overall, the Project is not anticipated to create new or additional demands to the extent that new or physically altered libraries would be required. Therefore, impacts would be less than significant.

[74] City of Covina, Parks & Facilities, https://covinaca.gov/parksrec/page/parks-facilities, accessed July 28, 2022.
[75] City of Covina, General Plan, Natural Resources and Open Space Element, 2000, page D-20.

XVI. 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?	☐	☐	☐	☒

Explanation of Checklist Responses

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. As described above for Checklist Question XV.a.iv, the Project would not develop residential uses and would not increase demands for park and recreational facilities from permanent residents. As such, the Project would not affect the City's current parkland to population ratio of 1.3 acres of open space for each 1,000 residents.[76] In addition, the Project would result in a net reduction of employees on-site. During Project construction and operation, employees would be anticipated to use the parks near their homes during non-work hours. As such, the demand that employees would have on parks would not increase when compared to existing conditions. Furthermore, the Project would provide short-term stays for hotel guests with an indoor fitness area and outdoor patio area on-site. The demand for existing parks and recreational facilities by hotel guests would be negligible. Thus, the Project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of facilities would occur or be accelerated. Therefore, impacts would be less than significant**.**

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project proposes the development of a 68-room hotel including an indoor fitness area and outdoor patio area on-site for use by hotel guests. As stated above, the Project is not anticipated to substantially increase the demand on parks and recreation facilities in the City. The Project would not require construction or expansion of recreational facilities. Therefore, no impact would occur.

[76] City of Covina, General Plan, Natural Resources and Open Space Element, 2000, page D-20.

XVII. 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. 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?	☐	☐	☒	☐

Explanation of Checklist Responses

The discussion and analysis in this section are based, in part, on the *Avid Hotel – Technical Memorandum* (Transportation Memo) prepared by Jano Baghdanian & Associates for the Project, which is included as **Appendix G** of this IS/MND. Documentation of the City's completed review and approval of the Transportation Memo is also included in **Appendix G** of this IS/MND.

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

Less Than Significant Impact. The Project was reviewed in accordance with the City of Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (October 2020). The discussion related to VMT is provided below in response to Checklist Question XVII.b. According to the guidelines, a LOS analysis shall be required for a proposed project when either the a.m. or p.m. peak hour trip generation from the proposed development is expected to exceed 100 vehicle trips and for projects that will add 51 or more trips during either the a.m. or p.m. peak hours to any intersection.

As detailed in the Transportation Memo, the Project would generate 21 net trips in the a.m. peak hour on weekdays, 27 net trips in the p.m. peak hour on weekdays, and 49 peak hour trips on Saturdays. The Project would generate fewer than 100 a.m. and p.m. peak hour trips, and the Project would not add 51 or more trips during the a.m. or p.m. peak hour to any nearby intersection. Therefore, a comprehensive traffic study with LOS analysis is not required.

With regard to transit, the nearest bus stop is approximately 443 feet south of the Project Site, and the Covina Metrolink Station is located approximately 1 mile northeast of the Project Site. As the Project construction staging would be limited to the Project Site, the Project would not obstruct the transit stops or impede operation of the vicinity's transit options. During operation, the Project would result in a net reduction of employees on-site and a generation of short-term hotel guests.

As such, the Project would not be anticipated to generate an increase in ridership that would impair transit services.

Per the City of Covina Bicycle Master Plan, a Class II bike lane is proposed along Azusa Avenue adjacent to the Project Site.[77] As the Project construction staging would be limited to the Project Site, the Project would not impede the planning or construction of the bicycle lane during the Project's construction activities. In addition, the Project's new right-turn ingress and egress driveway along Azusa Avenue would not have any visual or physical obstructions that would impede the construction or operation of the bicycle lane or pedestrian safety. Furthermore, as detailed in response to Checklist Question No. XVII.c, the Project's generated outbound trips from the Azusa Avenue driveway in the a.m. and p.m. peak hours would not impact the northbound left-turn lane on Azusa Avenue at the intersection with Front Street. Moreover, the Project's new driveway along Azusa Avenue and relocated alley along Glentana Street provide adequate widths for vehicle access and proper placement for clear visibility to ensure the safety of pedestrians and cyclists.

Therefore, the Project would not conflict with programs, plans, ordinances, or policies addressing the circulation system, and impacts would be less than significant.

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

Less Than Significant Impact. The Project was reviewed in accordance with the City of Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (October 2020). As provided in the Transportation Memo, three types of screening from the City Transportation Study Guidelines were applied to the Project. A Project may be screened out from project-level assessment using three types of screening methods: Transit Priority Area (TPA) Screening; Low VMT Area Screening; and Project Type Screening. Should a project comply with at least one of the three above-mentioned screening steps, the project's VMT impacts would be considered to be less than significant.

Transit Priority Area (TPA) Screening—Projects located within a TPA may be presumed to have a less-than-significant VMT impact if there is no substantial evidence otherwise.[78] However, this presumption may not be appropriate if the project: 1) has a FAR of less than 0.75; 2) includes more parking than required by the City; 3) is inconsistent with the applicable SCS (as determined by the lead agency, with input from SCAG); or 4) replaces affordable residential units with a smaller number of moderate- or high-income residential units.

According to the City's VMT Screening Tool, the Project is located in a TPA. In addition, the Project would result in a FAR of 0.82 and would provide less parking (55 spaces) than required (68 spaces). Furthermore, as described in the Checklist Section XI, the Project would be consistent with the SCAG RTP/SCS. As there are no existing residential units on-site, the

[77] City of Covina, Bicycle Master Plan, 2011, Figure 4-1.

[78] A TPA is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor per Public Resources Code definitions. Public Resources Code Section 21064.3 defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Public Resources Code Section 21155 defines a "high-quality transit corridor" as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

proposed hotel would not replace affordable residential units with a smaller number of moderate- or high-income residential units. As such, the Project would satisfy the TPA screening criteria such that Project VMT impacts would be less than significant.

Low VMT Area Screening—Residential and office projects located within a low VMT-generating area may be presumed to have a less-than-significant VMT impact if there is no substantial evidence otherwise. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area. Although the 68-room hotel is local-serving in nature and there is nothing unique about the Project that would attract patrons from outside of the City, as detailed in the Transportation Memo, use of the San Gabriel Valley Council of Governments VMT Screening Tool showed that the Project is not located within a low VMT area. As such, the Project would not satisfy the Low VMT Area Screening criteria.

Project Type Screening—Some project types have been identified as having the presumption of a less than significant impact. The City's Transportation Study Guidelines include a list of uses that can be presumed to have a less-than-significant VMT impact, if there is no substantial evidence otherwise, as their uses are local serving in nature. Included on this list are "Local-serving hotels (e.g., non-destination hotels)" and "Local serving retail projects with a total square footage less than 50,000 square feet."

The Project would include 68 hotel rooms and comprise 30,200 square feet, which would fall within the 50,000 square feet limit identified by the Transportation Study Guidelines. The Project is designed to provide lodging to visitors and guests of local businesses and would not include a restaurant or large indoor and outdoor gathering spaces for events or conferences. No unique features that would attract patrons from outside of the City would be proposed. Given the Project's size and amenities provided, the Project would be considered a local serving, non-destination hotel. As such, the Project would satisfy the Project Type Screening criteria such that Project VMT impacts would be considered less than significant.

Therefore, based on the above and as detailed in the Transportation Memo, the Project would satisfy two of three screening criteria and would not require a comprehensive VMT analysis. Project impacts related to VMT would be less than significant.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a site. These conflicts may be created by the driveway configuration or through the placement of driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections.

The Project would provide a new 26-foot-wide driveway along Azusa Avenue, which would be limited to right-turn ingress and egress due to the raised median located along the center of Azusa Avenue. Vehicles that exist the Project Site from this driveway can proceed northbound along

Azusa Avenue and make a U-turn where the raised median ends at the intersection of Front Street and Azusa Avenue. As calculated in the Transportation Memo, the Project would generate 12 net outbound trips in the a.m. peak hour and 11 net outbound trips in the p.m. peak hour. The analysis provided therein concluded that even if all of the outbound trips proceed to make a U-turn at the intersection of Front Street and Azusa Avenue, the northbound left-turn lane has 220 feet length of capacity and would not be projected to be impacted by the Project.

The Project would relocate the existing alley along Glentana Street to less than 100 feet to the east within the Project Site. This new driveway and portion of an alley would be 25 feet wide along Glentana Street. Access from this driveway will have no right- or left-turn restrictions given the low volume of inbound and outbound traffic during the a.m. and p.m. peak hour. (The Project would generate a net 9 inbound trips in the a.m. peak hour and 16 inbound trips in the p.m. peak hour. The outbound trips are described above.)

Both Project driveways would provide adequate widths for vehicle access and proper placement for clear visibility to ensure the safety of pedestrians and cyclists.

In addition, the Project would provide a 30-minute pickup/drop-off area along a segment of Glentana Street near the street entrance of the proposed building within the southwestern portion of the Project Site. This area is proposed to have a length of 40 feet and is subject to approval by the City's traffic engineer.

Furthermore, the proposed uses would be consistent with the surrounding uses (i.e., commercial and retail) and would not introduce hazards due to incompatible uses. Therefore, based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. Construction activities associated with the Project could potentially impact the provision of emergency services by the LACoFD and the CPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. As stated in the City's Safety Element, all major public streets serve as the principal evacuation routes.[79] For the Project, the nearest disaster routes would include Azusa Avenue, which is immediately west of the Project Site, and the San Bernardino Freeway (I-10), which is located approximately 1.25 miles south of the Project Site. During Project construction, staging would occur only within the Project Site. Access to and along Azusa Avenue adjacent to the Project Site would remain unobstructed, and Glentana Street would remain accessible to emergency vehicles. The Project would also be required to undergo site plan review and obtain approval from the City to verify that the Project complies with all applicable safety and access requirements. The completed Project would provide a new driveway along Azusa Avenue, which would provide adequate access for emergency vehicles to the site. While the Project would not propose changes within major public streets such as Azusa Avenue, the Project would relocate an existing alley along Glentana Street to less than 100 feet to the east within the Project Site. However, the relocated alley would still provide ingress and egress along Glentana Street, which is a dead-end street to the east (i.e., not an evacuation route). As such, the Project would not result in inadequate emergency access, and impacts would be less than significant**.**

[79] City of Covina, General Plan, Safety Element, 2000, Section VII.

XVIII. TRIBAL CULTURAL RESOURCES

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

Explanation of Checklist Responses

a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is 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 above for Checklist Question V.a and evaluated in the *Cultural Resources Identification Memorandum* (**Appendix B** of this IS/MND), no historical resources were identified within the Project Site as a result of the SCCIC records search; literature, map, and aerial photo reviews; historical society consultation; pedestrian survey; and California and City Register evaluations. As such, there are no known tribal cultural resources that exist on the site that are eligible for listing on the California Register of Historical Resources or in a local register. Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. Impacts would be less than significant.

b. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native

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

Less Than Significant Impact with Mitigation Incorporated. In compliance with AB 52 (PRC 21074), which requires tribal consultation as part of the CEQA process, the City initiated consultation in April 2022. The City received a request for consultation from Chairman Andrew Salas, chairperson of the Gabrieleño Band of Mission Indians−Kizh Nation (Kizh Nation). Consultation occurred on May 10, 2022, between the City and Kizh Nation representatives regarding the Project. As discussed in more detail in **Appendix H**, the Kizh Nation asserted that the area was sensitive for tribal cultural resources based on ethnographic and historical documentation of past Native American use. In discussion with the City and as provided in correspondence dated October 22, 2021, Chairperson Salas stated that the Project Site is located within the boundaries of Kizh ancestral territory and that there is a potential to impact Kizh Nation tribal cultural resources during Project construction.

As a result, **Mitigation Measures TCR-1, TCR-2, and TCR-3** provided by the Kizh Nation will be implemented such that in the event of any discovery of unknown tribal cultural resources during Project construction activities, impacts would be reduced to a less-than-significant level.

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The Project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians—Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at the Project Site. “Ground disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the Project applicant prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the Project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project Site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the Project applicant that no future, planned construction activity and/or development/construction phase at the Project Site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the Project Site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the Project Site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an

institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3: Procedures for Burials and Funerary Remains

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project Site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

XIX. 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 management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Explanation of Checklist Responses

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

Less Than Significant Impact. The Project would involve the demolition of a single-story, 6,221-square-foot commercial building and a single-story, 485-square-foot commercial building and the construction of a three-story, 30,200-square-foot hotel building. As such, the Project Site would undergo a net increase of 23,494 square feet of development. Also, given the increase in intensity of uses, the Project would result in an increase in water demand and wastewater generation, as well as an increase in demand on other utilities, such as electricity, natural gas, and telecommunications. The existing commercial uses on-site are currently served by these utilities.

Water

Water service is provided to the Project Site by the Water Utility Division of the Department of Public Works. Based on the proposed uses, the Project would increase the water demand on-site when compared to existing conditions.

According to the City's 2020 Urban Water Management Plan (UWMP), the reliable quantities of projected water supply for Year 2023 and Year 2024 are 5,552 acre-feet per year (afy) and 5,607 afy, respectively.[80] As shown in Table XIX-1, the Project would result in a net increase of 7,159 gallons per day (or approximately 8.0 afy) in water demand. The estimated water consumption of the Project is less than 1 percent of the Water Utility Division's projected water supply for 2023 and 2024 and would not, therefore, significantly impact existing water service. In addition, the Project would be in compliance with CalGreen (i.e., would provide water-efficient appliances and fixtures) and the City's Water Efficient Landscape Ordinance, thereby ensuring efficient use of water on-site. Furthermore, the Project would be required to pay water connection fees as applicable. Therefore, the Project would not require or result in the relocation or construction of new water facilities, and impacts would be less than significant.

Table XIX-1
Project Net Water Demand

Land Use	Size	Generation Rate[1]	Total (gpd)
Existing Uses to be Removed			
Commercial building	6,221 sf	0.200 gpd/sf	1,244 gpd
Commercial building	485 sf	0.200 gpd/sf	97 gpd
Subtotal Existing			1,341 gpd
Proposed Uses			
Hotel	68 rm	125 gpd/rm	8,500 gpd
Total Net Water Demand			**7,159 gpd** **8.0 afy**

gpd = gallons per day
sf = square feet
afy = acre-feet per year
Note:
1. Los Angeles County Sanitation District, Table 1 – Loadings for Each Class of Land Use. Consistent with County methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation rates, which also serve to estimate water demand.

Wastewater

The City's sanitary sewer collection system is managed by the City of Covina Public Works Department. The collection system consists of about 120.5 miles of gravity sewer lines and one pump station. About 98 percent of flows from these local sewers discharge into the Los Angeles County Sanitation Districts (LACSD) trunk sewers throughout the community, for transmission,

[80] City of Covina, 2020 Urban Water Management Plan, Tables 6-8 and 6-9, based on linear interpolation of 2020 and 2025 data.

treatment, and disposal.[81] The remaining sewage generated within City limits is discharged into the adjacent unincorporated areas and the City of West Covina sewer systems, which subsequently discharge into LACSD trunk sewers for transmission, treatment, and disposal. The regional trunk sewer lines deliver wastewater to one or more water reclamation plants owned by LACSD for treatment. The water reclamation plants serving the City include the San Jose Creek Water Reclamation Plant (SJCWRP) in the City of Whittier and the Joint Water Pollution Control Plant (JWPCP) in the City of Carson. According to the City's 2020 UWMP, the percentage breakdown between these two plants in treating the City's wastewater in unknown; however, the SJCWRP has a treatment capacity of 100 million gpd, and the JWPCP has a treatment capacity of 300 million gpd.[82] As shown in Table XIX-2, the Project would generate a net increase of 7,159 gallons of wastewater per day. As such, the Project would result in a nominal amount of wastewater relative to the treatment capacities. Furthermore, the Project would be required to pay sewer connection fees to the sewer lines available along Azusa Avenue and Glentana Street as applicable.[83] Therefore, the Project would not require or result in the relocation or construction of new wastewater facilities, and impacts would be less than significant.

Table XIX-2
Project Net Wastewater Generation

Land Use	Size	Generation Rate[1]	Total (gpd)
Existing Uses to be Removed			
Commercial building	6,221 sf	0.200 gpd/sf	1,244 gpd
Commercial building	485 sf	0.200 gpd/sf	97 gpd
Subtotal Existing			1,341 gpd
Proposed Uses			
Hotel	68 rm	125 gpd/rm	8,500 gpd
Total Net Wastewater Generation			**7,159 gpd** **8.0 afy**

gpd = gallons per day
sf = square feet
afy = acre-feet per year

Note:
1. Los Angeles County Sanitation District, Table 1 – Loadings for Each Class of Land Use.

Stormwater Drainage

As discussed in Checklist Section X, Hydrology and Water Quality, of this IS, the existing storm drainage facilities, coupled with the Project's proposed drywell ground infiltration system, would be adequate to accommodate Project runoff. As described in the Preliminary Hydrology/LID Memorandum, the proposed drywell ground infiltration system would retain 100 percent of the SWQDv on-site.[84] The dry well overflow drains would spill the extra runoff through the curb in Azusa Avenue to mimic existing drainage conditions. No physical modifications to the existing

81 City of Covina, Sewer System Management Plan, Final Report, December 2014.
82 City of Covina, 2020 Urban Water Management Plan.
83 City of Covina, 2014 Sewer System Management Plan, Sewer System Index Map.
84 Rhyton Engineering, *Preliminary Hydrology/LID Memorandum, Avid Hotel – Covina*, March 23, 2023. See **Appendix E** of this IS/MND.

municipal stormwater infrastructure in the Project vicinity would be required to handle the Project stormwater runoff. Furthermore, in compliance with CMC Section 8.50.100, the Project's short-term construction activities would be required to include implementation of an erosion and sediment control plan and BMPs to ensure that discharges of pollutants are effectively prohibited and will not cause or contribute to an exceedance of water quality standards. All construction and grading activities would comply with applicable laws and regulatory documents, including all applicable City ordinances and the City's permit regulating discharges into and from the storm drain system. Through such compliance, potential water quality impacts during construction and operation would be avoided or reduced to less than significant levels and would avoid conflicts with water quality standards. Thus, the Project would not require the construction or relocation of new or expanded stormwater facilities and impacts would be less than significant.

Dry Utilities (Electricity, Natural Gas, Telecommunications)

SCE and SoCalGas provide electricity and natural gas services, respectively, to the Project Site. These providers service the existing buildings on the Project Site. As such, Project-related improvements would include connection of existing electricity and natural gas service lines to the proposed hotel building.

SCE's existing portfolio of resources includes renewable energy (31.4 percent), large hydroelectric (2.3 percent), natural gas (22.3 percent), nuclear (9.2 percent), and other/unspecified power sources (34.8 percent).[85] This mix of resources enhances electrical system resilience by not relying on a single transmission source. SCE's Integrated Resource Plan has a primary objective that includes system reliability, as well as establishing SCE's planned procurement of energy to meet demands through 2030.[86] Therefore, SCE's long-term forecasts for electricity demand within its service area, which includes the Project Site, would account for Project-related electricity demand. However, should SCE determine that upgrades to existing electrical energy infrastructure would be necessary, resulting from either the demand of the proposed Project or cumulative demand increases, such off-site upgrade projects would be undertaken by SCE and would be subject to environmental review pursuant to CEQA. Attempting to estimate what environmental impacts may result from such electrical utility infrastructure improvements without knowledge of when and where the improvements would take place would be speculative.

SoCalGas is the principal distributor of natural gas in Southern California. Utility-served, statewide natural gas demand is projected to decrease at an annual average rate of 1.1 percent per year through 2035, and total statewide residential gas demand is projected to decrease at an annual average rate of 2.4 percent per year, which is faster than the 1.7 percent annual rate of decline that had been forecasted previously in the 2020 California Gas Report.[87] Furthermore, SoCalGas is anticipated to meet a projected extreme peak day demand of 2,827 million cubic feet of natural gas per day in 2023 through a combination of withdrawals from underground storage facilities and flowing pipeline supplies.[88] As such, because of its extremely large service area and natural gas supplies, in addition to decreasing natural gas demand, SoCalGas would have adequate capacity to support the Project. Should SoCal Gas determine that upgrades to existing natural gas infrastructure would be necessary, resulting from either the demand of the proposed Project or

85 Southern California Edison, 2021 Power Content Label.
86 Southern California Edison, 2017-2018 Integrated Resource Plan, August 1, 2018.
87 California Gas and Electric Utilities, 2022 California Gas Report.
88 California Gas and Electric Utilities, 2022 California Gas Report.

cumulative demand increases, such off-site upgrade projects would be undertaken by SoCal Gas and would be subject to environmental review pursuant to CEQA.

Telecommunication services are provided to the existing office buildings on the Project Site by private companies. Upgrades to the existing telecommunication infrastructure on the Project Site would involve connecting the proposed hotel building to existing telecommunications connections within the Project Site and in adjacent streets. Upgrades to existing telecommunication facilities and construction of new facilities to meet user demand are determined by telecommunication providers and subject to its own environmental review. Any traffic disruptions associated with telecommunication utility activities within the travel lanes would be addressed through routine traffic control measures.

In summary, the Project would not result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities and impacts would be less than significant.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. Due to the proposed size and uses, the Project is not subject to a water supply assessment pursuant to California Water Code Section 10912 criteria.[89] As discussed above, water service is provided to the Project Site by the Water Utility Division of the Department of Public Works. The City's service area covers approximately 7 square miles encompassing the majority of the City of Covina, a portion of the City of West Covina, and an unincorporated portion of Los Angeles County. The City's main water supply sources include surface water diversions from the San Gabriel River, groundwater pumped from the Main San Gabriel Basin, and imported water, all of which are purchased from the Covina Irrigating Company (CIC).[90] According to the City's 2020 UWMP, the CIC has significantly reduced its reliance on surface water diversions from the San Gabriel River. The City's secondary water supply source includes treated, imported surface water from the Metropolitan Water District of Southern California (MWD) conveyed from the Colorado River Aqueduct and the California Aqueduct and purchased through the Three Valleys Municipal Water District. In the event that CIC water supplies are impacted, the City has the flexibility of relying on its treated imported water connection with Three Valleys District. In compliance with legislative requirements, the UWMP assessed the water service reliability during a normal year, a single dry year, and a five consecutive year drought, along with projections through fiscal year 2044-2045. As detailed in the UWMP, the City would be able to meet the water demands during normal years, single dry years, and five consecutive year drought periods over the next 25 years. Although adequate supplies are anticipated, the cost of those water supplies may become incrementally more expensive. Therefore, the City will continue to maintain its water shortage contingency plan to encourage

[89] In accordance with California Water Code Section 10912, projects subject to CEQA that require a water supply assessment include: (1) a proposed residential development of more than 500 dwelling units; (2) a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; (3) a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) a proposed hotel or motel, or both, having more than 500 rooms; (5) a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; (6) a mixed-use project that includes one or more of the projects specified in this subdivision; or (7) a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

[90] City of Covina, 2020 Urban Water Management Plan.

retail customers to reduce water consumption. Furthermore, the City will adhere to mandated statewide reductions. No new water supply, storage, or distribution facilities are identified in the UWMP to address water demands of the City. Accordingly, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, impacts to water supplies would be less than significant.

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

Less Than Significant Impact. As discussed above, the Project would connect to existing sewer infrastructure surrounding the Project Site. The Project would result in a net increase of wastewater generation of 7,159 gpd. As discussed in Checklist Question XIX.a, the Project would result in a nominal amount of wastewater relative to the combined 400-million-gpd capacity of the SJCWRP and JWPCP. Furthermore, the Project would be required to pay sewer connection fees to the sewer lines available along Azusa Avenue and Glentana Street as applicable. Therefore, Project impacts related to wastewater treatment capacity would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. According to the most recently available information from the California Department of Resources Recycling and Recovery (CalRecycle), in 2019, the City of Covina disposed of approximately 48,285 tons of solid waste at a solid waste facility, 239 tons at the Southeast Resource Recovery Facility (a transformation facility), and 3,044 tons of alternative daily cover.[91] Of the 16 facilities that received waste from the City, six facilities that accept both construction and demolition waste and municipal solid waste received more than 1,000 tons of waste, including those within and outside Los Angeles County: Azusa Land Reclamation Co. Landfill, Chiquita Canyon Sanitary Landfill, El Sobrante Landfill, Mid-Valley Sanitary Landfill, Olinda Alpha Landfill, and San Timoteo Sanitary Landfill.

Construction, demolition, and remodel activities occurring within the City generate a significant volume of debris that could be destined for landfills. In order to preserve available landfill space and maintain compliance with SB 1374, pursuant to CMC Chapter 8.09 and Ordinance 18-03, the City requires the recycling or reuse of material generated by construction, demolition, and remodel activities. All covered projects shall reuse, recycle, or divert at least 75 percent (or the state-mandated diversion percentage, whichever is greater), of all construction and demolition debris from landfills or disposal sites. Accordingly, the Project would be required to prepare a pre-project recycling plan (PPRP) pursuant to CMC Section 8.09.070 to document the amount and type of materials and waste, the hauler and hauling destination, and the diversion rate. The PPRP would be approved by the City prior to issuance of a building, demolition, or grading permit. As previously discussed, the Project would demolish the existing 6,221-square-foot commercial building and

[91] CalRecycle, Jurisdiction Disposal by Facility and Alternative Daily Cover Tons by Facility, Year 2021 for Los Angeles–Covina, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed April 14, 2022; alternative daily cover refers to cover material other than earthen material placed on the surface of the active face of a municipal solid waste landfill at the end of each operating day to control vectors, fires, odors, blowing litter, and scavenging.

485-square-foot commercial building to construct a 30,200-square-foot hotel building. As shown in Table XIX-3, the Project would generate 595 tons of demolition and construction waste. After accounting for a 75 percent diversion rate, the Project would dispose of approximately 149 tons of waste to landfills.

Table XIX-3
Project Demolition and Construction Waste Generation

Land Use	Size	Generation Rate (lbs/sf)[1]	Total (tons)
Demolition Waste			
Existing commercial building	6,221 sf	158 lbs/sf	491
Existing commercial building	485 sf	158 lbs/sf	38
Construction Waste			
Proposed building	30,200 sf	4.34 lbs/sf	66
Total Waste prior to diversion			**595**
Total Waste after 75% diversion			**149**

lbs = pounds

sf = square feet

1 lb = 0.0005 ton

Note:

1. USEPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Report No. EPA530-R-09-002, March 2009, Tables 2-2 and 2-4.

Based on available remaining permitted disposal capacity information provided by the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) 2020 Annual Report, the Project's 149 tons of demolition and construction waste would represent approximately 0.0002 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons; approximately 0.0003 percent of the Chiquita Canyon Sanitary Landfill's remaining disposal capacity of 54.42 million tons; approximately 0.0001 percent of the El Sobrante Landfill's remaining disposal capacity of 137 million tons; approximately 0.0004 percent of the Mid-Valley Sanitary Landfill's remaining disposal capacity of 35 million tons; approximately 0.001 percent of the Olinda Alpha Landfill's remaining disposal capacity of 13 million tons; and approximately 0.002 percent of the San Timoteo Sanitary Landfill's remaining disposal capacity of 6 million tons.[92] As such, such landfills would be able to accommodate the estimated 149 tons of post-diversion waste from the Project's construction activities.

Once operational, solid waste generated by the Project would consist of typical waste from a hotel building. It is anticipated that Project-generated waste would continue to be accepted by the same multiple refuse disposal facilities that currently receive the City's municipal solid wastes, including those identified above. During operation of the Project, as shown in Table XIX-4, solid waste generated by the hotel rooms and employees would amount to approximately 79 tons per year. Based on available remaining permitted disposal capacity information provided by the ColWMP 2020 Annual Report, the Project's 79 tons of operational solid waste would represent the following

[92] Los Angeles County, Countywide Integrated Waste Management Plan 2020 Annual Report, Appendix E-2, Tables 4 and 6.

percentages at landfills accepting municipal waste from the City: approximately 0.0001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons; approximately 0.0001 percent of the Chiquita Canyon Sanitary Landfill's remaining disposal capacity of 54.42 million tons; approximately 0.00006 percent of the El Sobrante Landfill's remaining disposal capacity of 137 million tons; approximately 0.0002 percent of the Mid-Valley Sanitary Landfill's remaining disposal capacity of 35 million tons; approximately 0.0006 percent of the Olinda Alpha Landfill's remaining disposal capacity of 13 million tons; and approximately 0.001 percent of the San Timoteo Sanitary Landfill's remaining disposal capacity of 6 million tons.[93] As such, such landfills would be able to accommodate waste from the Project's operations.

Based on the above, Project construction and operation activities would not 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. Therefore, Project impacts to solid waste facilities would be less than significant.

Table XIX-4
Project Operation Waste Generation

Land Use	Size	Generation Rate[1]	Total (tons/year)
Hotel	68 rm	4 lbs/rm/day	50
Hotel	15 emp	10.53 lbs/emp/day	29
Total Waste			**79**

lbs = pounds
sf = square feet
1 lb = 0.0005 ton
Note:
1. CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates, accessed April 14, 2022.

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

Less Than Significant Impact. As discussed above, the Project would comply with the state and City diversion requirements by reusing, recycling, or diverting at least 75 percent (or the state-mandated diversion percentage, whichever is greater) of all construction and demolition debris from landfills or disposal sites. The Project would prepare a PPRP for approval by the City prior to issuance of a building, demolition, or grading permit. Furthermore, the Project would comply with City requirements to document a Post-Project Compliance Report. Specifically, within 90 calendar days following Project completion, the report must be submitted to the City with weight tickets from all haulers and facilities that handled the Project waste stream. The Project would also comply with AB 341, which set a statewide goal of 75 percent disposal reduction by 2020, by providing clearly marked, source-sorted receptacles to facilitate recycling. The Project would place these waste receptacles separate from the hotel building and, in accordance with CMC Section 8.08.140.A.2, in locations that allow for mechanical collection and which minimize

[93] Los Angeles County, Countywide Integrated Waste Management Plan 2020 Annual Report, Appendix E-2, Tables 4 and 6.

interference with public rights-of-way, off-street parking, and/or ingress and egress serving the premises. SB 1383 mandates organics recycling for businesses, including hotels with at least 200 rooms and on-site food facility. With 68 rooms and no on-site food facility, the Project would not be subject to organics recycling.

Based on the above, the Project would comply with adopted programs and regulations pertaining to solid waste, and City waste diversion goals, as applicable. Thus, participation in the City's recycling programs during construction and operation would ensure that the Project would not conflict with federal, state, and local statutes and regulations related to solid waste. Accordingly, the Project would not 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. Therefore, impacts related to solid waste generation would be less than significant.

XX. 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?	☐	☐	☐	☒

Explanation of Checklist Responses

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is located in an urbanized area and is not adjacent to any wildland areas. According to CalFire, the Project Site is not located within a Fire Hazard Area or a state responsibility area.[94] The nearest Fire Hazard Areas are a Very High Fire Hazard Severity Zone (VHFHSZ) located approximately 2.4 miles southeast of the Project Site near Covina Hills, and a VHFHSZ located approximately 2.6 miles northwest of the Project Site near the Santa Fe Dam. Therefore, no impact would occur**.**

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?

[94] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones Maps, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/, accessed April 5, 2022.

No Impact. The Project Site is not located within or adjacent to a VHFHSZ or state responsibility area. Therefore, no impact would occur.

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located within or adjacent to a VHFHSZ or state responsibility area. Therefore, no impact would occur.

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located within or adjacent to a VHFHSZ or state responsibility area. Therefore, no impact would occur.

XXI. 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 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?	☐	☒	☐	☐
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?	☐	☒	☐	☐

Explanation of Checklist Responses

a. Does the project have the potential to 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?

Less Than Significant Impact with Mitigation Incorporated. As discussed in Checklist Question IV.d, the Project's removal of three on-site trees has the potential to interfere with a nesting bird or raptor protected under the Migratory Bird Treaty Act. Construction could also potentially occur during breeding, reproduction, and juvenile rearing periods for nesting birds and raptors (i.e., between February 15–August 31). As such, the Project would comply with **Mitigation Measure BIO-1** to reduce potential impacts to nesting birds to less than significant.

As discussed in Checklist Section V, the Project would not cause a substantial adverse change in the significance of a historical resource, and no related impacts would occur. With regard to archaeological resources, there is low sensitivity for significant prehistoric or historic period archaeological resources within the Project Site. Nonetheless, **Mitigation Measure CUL-1** is included to require the proper handling and disposition of archaeological resources in the

unexpected event that such resources are inadvertently discovered during Project construction. Mitigation Measure CUL-1 would ensure that any impacts to archaeological resources would be less than significant.

As discussed in Checklist Question VII.f, the Project Site can be considered to have low to no sensitivity for fossils. Nonetheless, **Mitigation Measure GEO-1** is included to require the proper handling and disposition of paleontological resources in the unexpected event that such resources are inadvertently discovered during Project construction. **Mitigation Measure GEO-1** would ensure that any impacts to paleontological resources would be less than significant.

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

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[95] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[96]

The City has several proposed development projects under review. The closest project is 0.44 miles from the Project Site, while the others are located 1.0 mile or farther.[97] Due to these distances, the physical and site-specific conditions of the Project Site, and with the incorporation of the mitigation measures identified in this IS/MND, the Project would not have impacts that are cumulatively considerable. In addition, although the Project would generate new short-term construction jobs in the Project area, the Project would only generate a limited number of employees to support hotel operations. The Project also does not include residential or commercial components. As such, the Project is not expected to induce any growth in the region. In addition, as detailed in the preceding sections, the Project would not result in any significant and unmitigable impacts in any environmental categories. The Project would be consistent with regional plans and programs that address environmental factors such as air quality, energy, GHG emissions, transportation, utilities, and other applicable regulations that have been adopted by public agencies. In many cases, including aesthetics, agriculture, biological resources, cultural resources, geology, hazards, land use, mineral resources, noise, public services and recreation, tribal cultural resources, and wildfire, the impacts associated with the Project are either localized to the Project Site or are of such a negligible degree that they would not result in a considerable contribution to any significant cumulative impacts. Therefore, cumulative impacts would be less than significant (not cumulatively considerable) and the Project would not result in a mandatory finding of significance in this regard.

---

95 State CEQA Guideline, 14 California Code of Regulations, Section 15355, et seq.
96 State CEQA Guideline, 14 California Code of Regulations, Section 15355, et seq.
97 City of Covina, Projects Under Review, https://covinaca.gov/pc/page/projects-under-review, accessed February 2, 2023.

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

Less Than Significant Impact with Mitigation Incorporated. As discussed in Checklist Sections I through XX of this document, the Project has been determined to have no impacts, less-than-significant impacts, and impacts that are less than significant with incorporation of mitigation measures. Therefore, the Project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.

5. PREPARERS

Lead Agency

City of Covina
Planning Department
125 East College Street
Covina, CA 91723

Brian Lee, Director of Community Development
Mercenia Lugo, Planning Manager

Michael Baker International

3760 Kilroy Airport Way, Suite 270
Long Beach, CA 90806

John Bellas, Project Director
Fareeha Kibriya, QA/QC Manager
Frankie Tong, Project Manager
Eddie Torres, Technical Manager–Air Quality & Noise
Zhe Chen, Technical Manager–Air Quality & Noise
Margo Nayyar, Senior Associate, Department Manager—Cultural Resources
Nicholas Hearth, Senior Archaeologist/Principal Investigator
Jacob Parsley, Archaeologist
Peter Kloess, Environmental Specialist
Darshan Shivaiah, Technical Specialist–Air Quality & Noise
Tina Yuan, Environmental Associate
Winnie Woo, Environmental Associate