

**APPENDIX A**  
*NOP and NOP Comment Letters*





## Notice of Preparation

**Date of Notice:** May 11, 2016

**To:** State Clearing House  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, California 95814

-AND-

Agencies, Organizations, and Interested Parties

**Subject:** Notice of Preparation of a Draft Environmental Impact Report

**Project Title:** Covina Transit Oriented Mixed-Use Development Project

**Project Location:** 1162 North Citrus Avenue & 177 East Covina Boulevard

**Lead Agency:** City of Covina

**Lead Agency Contact:** Brian K. Lee, AICP  
Director of Community Development  
City of Covina, Planning Division  
125 E. College Street  
Covina, CA 91723  
blee@covinaca.gov

This Notice of Preparation (NOP) has been prepared to notify agencies and interested parties that the City of Covina (City), as the Lead Agency, will prepare an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for the proposed Covina Transit Oriented Mixed-Use Development Project (proposed project). The project description, location, and the potential environmental effects of the project are included below in this NOP.

The City requests your comments as to the scope and content of the EIR. Comments must be submitted in writing pursuant to the directions below. If you represent an agency, the City is seeking comments as to the scope and content of the environmental information in the document which is germane to your agency's statutory responsibilities in connection with the proposed project. To the extent that your agency has authority to issue permits or take other actions related to the project, your agency will need to use the EIR prepared by the City when considering your permitting decisions or other approval for the project.

In accordance with the time limits established by CEQA, the City requests comments be received by the close of business on June 14, 2016. Please send your comments, including a return address and contact name, via mail to:

Brian K. Lee, AICP  
Director of Community Development  
City of Covina, Planning Division  
125 E. College Street  
Covina, CA 91723  
blee@covinaca.gov

**Project Location:**

The proposed project site is composed of a former K-Mart property, located at 1162 North Citrus Avenue, and an existing private school property, located at 177 East Covina Boulevard. Figure 1 shows the project location in a regional context, and Figure 2 shows the project site boundaries. The project site is approximately 10.71 acres in size. The site is bounded by North Citrus Avenue to the west, East Covina Boulevard to the south, and residential developments to the north and east. The former K-Mart store has been closed for several years and is currently a vacant commercial building. The store included an automobile service facility, located on the south end of the project site facing North Citrus Avenue. There is an existing strip mall of approximately 21,719 square feet located on the northeast corner of North Citrus Avenue and East Covina Boulevard, which is not part of the project site.

**Project Description:**

The proposed project would redevelop the project site with a mixed-use development consisting of the Covina Innovation, Technology, and Event Center (iTEC), a Transit Center/Park & Ride facility, and a residential development. As shown in Figure 3, the residential component would be situated in the northern portion of the site, while the iTEC and the Transit Center/Park & Ride facility would be in the southern portion of the site. The project is the result of coordination between three distinct entities, each of which would design, own, and operate their respective portion of the overall mixed-use development. The City would design, own, and operate the iTEC; Foothill Transit would design, own, and operate the Transit Center/Park & Ride facility, and a private developer (MLC Holdings, Inc.) would develop the residential component to be sold at a later time to a separate operator. These components are described below and are shown conceptually in Figure 3.

**Covina iTEC.** The iTEC would be situated in the southeastern portion of the site and would consist of the following uses (square footages are approximate): 25,000 square feet of event center space; 5,000 square feet of business/technology incubation areas that would provide shared workspace for small-scale and start-up businesses; 15,000 square feet of professional

office space; and an outdoor plaza/public space area of 20,000 square feet. Surface parking would surround the iTEC to the south, east, and north. The iTEC would be approximately 50 feet in height.

**Transit Center/Park & Ride Facility.** This component would be located south of the residential component and north of the Covina iTEC component, consisting of a parking structure, transit-related retail, a bus depot, and electric bus charging stations. The parking structure would be situated adjacent to the proposed residential uses, with ingress/egress along North Citrus Avenue and Covina Boulevard, and would be approximately three or four levels tall and approximately 55,500 square feet in size. The parking structure would support approximately 400 to 450 parking stalls. Retail uses adjacent to the parking structure would consist of a 3,000-square foot retail building. South of the parking structure would be bus bays, used for bus loading and unloading of passengers and for bus layovers. As described above, this project component would be owned and operated by Foothill Transit, which is governed by a Joint Powers Authority of 22 member cities and the County of Los Angeles in the San Gabriel and Pomona Valleys, that operates a fixed-route bus public transit service in the San Gabriel Valley and in the greater Los Angeles metropolitan area.

**Residential.** The residential component of the project would consist of up to 120 for sale townhome units, covering the northern portion of the project site. The units would average approximately 1,900 square feet in size, for a total residential square footage of approximately 228,000 square feet. The residential buildings would be approximately 37 feet in height. This component of the project would also include a private recreation area of approximately 7,100 square feet along the project site's eastern boundary.

The proposed project would require the following land use entitlements to allow for multi-family residential development and public use development on the former commercial site:

1. Development Agreement;
2. General Plan Amendment;
3. Specific Plan;
4. Zone Change;
5. Subdivision map for the residential and public use parcels;
6. Subdivision map for the for-sale residential development; and
7. Site plan review for the residential development and public use development.

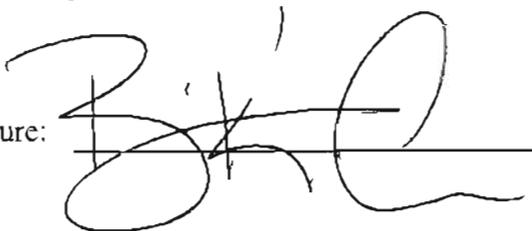
**Potential Environmental Effects of the Proposed Project:**

The EIR will evaluate the following environmental resource issues in addition to the CEQA-mandated topics such as cumulative impacts, growth inducement, and project alternatives:

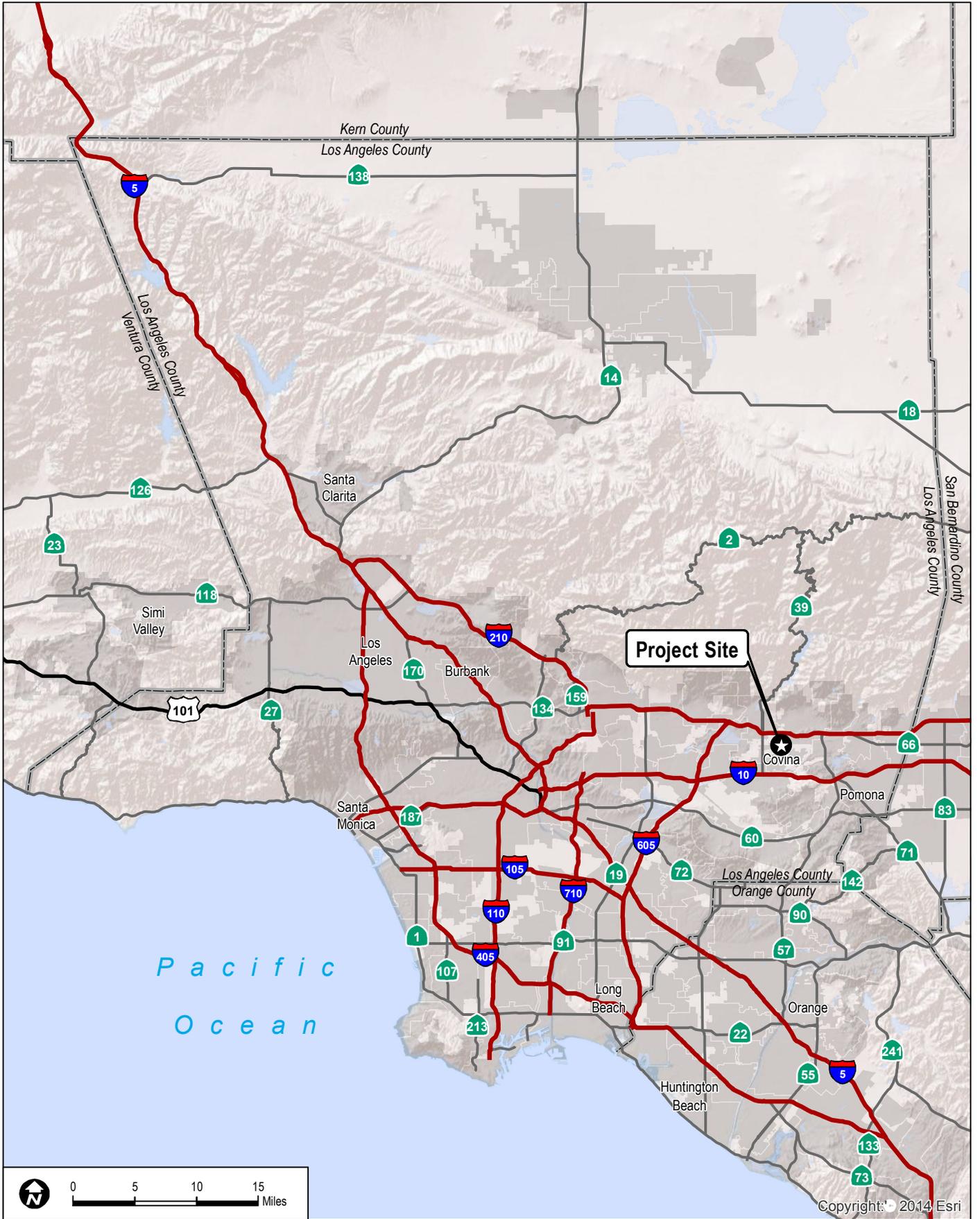
- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

The content of the EIR will be subject to input received during the NOP comment period.

Date: 5.11.16

Signature: 

Attachments: Figure 1, Regional Location  
Figure 2, Project Site  
Figure 3, Conceptual Site Plan



**DUDEK**

Covina Transit Oriented Mixed-Use Development Project

**FIGURE 1**  
**Regional Location**



**Project Site**

 Project Site

SOURCE: Bing Imagery, 2016

**DUDEK**

Covina Transit Oriented Mixed-Use Development Project

**FIGURE 2**  
Project Site

CITRUS AVENUE

## RESIDENTIAL COMPONENT

600' X 378' (5.21 ACRES)

## PUBLIC COMPONENT

(5.43 ACRES)

CITY OF COVINA EVENT CENTER, BUSINESS INCUBATOR,  
PROFESSIONAL OFFICE AND PUBLIC PLAZA / OPEN SPACE  
&  
FOOTHILL TRANSIT PARK & RIDE AND TRANSIT CENTER

EXISTING PROPERTY LINE

EXISTING  
21,719 SF

BUS DECELERATION LANE

COVINA BLVD.

N.T.S.



**DUDEK**

SOURCE: City of Covina

**FIGURE 3**  
**Conceptual Site Plan**

Covina Transit Oriented Mixed-Use Development Project

**iTEC Mixed Use Project - EIR Distribution List**

<b>Agency</b>	<b>Contact</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip</b>
Azusa Water		P.O. Box 9500	Azusa	CA	91702
Caltrans	District 7 Environmental Branch	100 S. Main Street	Los Angeles	CA	90012
City of Azusa	Planning Department	213 E. Foothill Blvd.	Azusa	CA	91702
City of Covina	Planning Department	125 E College Street	Covina	CA	91723
City of Covina	Building & Safety	125 E College Street	Covina	CA	91723
City of Covina	Engineering Division	125 E College Street	Covina	CA	91723
City of Covina	Environmental Services Division	125 E College Street	Covina	CA	91723
City of Covina	Finance Department	125 E College Street	Covina	CA	91723
City of Covina	Parks & Rec c/o Amy Hall-McGrade	1250 N Hollenbeck Avenue	Covina	CA	91722
City of Glendora	Planning Department	116 E. Foothill Blvd.	Glendora	CA	91741-3380
City of San Dimas	Planning Department	245 East Bonita Avenue	San Dimas	CA	91773
City of West Covina	Planning Department	1444 West Garvey Ave South	West Covina	CA	91790
County of Los Angeles Fire Department	Chief Kevin Johnson, Forestry Unit	5823 Rickenbacker Road Room 12	Commerce	CA	90040
Covina Police Department	Police Chief	444 N Citrus Avenue	Covina	CA	91723
Covina Valley School District	Superintendent	519 E. Badillo St.	Covina	CA	91723
Department of Regional Planning		320 West Temple Street	Los Angeles	CA	90012
Foothill Transit		100 S. Vincent Avenue, Suite 200	West Covina	CA	91790
LAFCO		80 South Lake Avenue, Suite 870	Pasadena	CA	91101
Los Angeles County Registrar/Recorder	County Clerk	12400 Imperial Highway	Norwalk	CA	90650
Metrolink		P.O. Box 531776	Los Angeles	CA	90053-1776
Metropolitan Transportation Authority		One Gateway Plaza	Los Angeles	CA	90012-2952
Office of Planning and Research	State Clearinghouse	1400 Tenth Street	Sacramento	CA	95814
Southern California Association of Governments		818 West 7th Street, 12th Floor	Los Angeles	CA	90017
Southern California Edison	Service Planner	800 W. Cienga Avenue	San Dimas	CA	91773-2447
Southern California Gas Company	Service Planner	196 E. 3rd St.	Pomona	CA	91766-1806
Time Warner Cable		900 N Citrus Avenue	Covina	CA	91722
US Post Office		170 E College Street	Covina	CA	91723-7000
Verizon	Service Planner	5010 N. Azusa Canyon Road	Irwindale	CA	91706

*[Handwritten scribble]*



TORRES MARTINEZ DESERT CAHUILLA INDIANS

P.O. Box 1160  
Thermal, CA 92274  
(760) 397-0300 – FAX (760) 397-8146

RECEIVED BY  
COUNTY CLERK  
16 MAY 17 PM 1:02

May 11, 2016

**To whom it may concern:**

**Re: California Environmental Quality Act Public Resources Code section 21080.3, subd. (b) ; California Assembly Bill 52, Request for Formal Notification of Proposed Projects within your jurisdiction that is traditionally and culturally affiliated with the Torres Martinez Desert Cahuilla Indians.**

The purpose of this letter is to request formal notification of proposed projects within your jurisdiction that is traditionally and culturally affiliated with the Torres Martinez Desert Cahuilla Indians, in accordance with Public Resources Code Section 21080.3.1, subd. (b). As of the date of this letter, you have been formally notified that the boundaries of your local government’s jurisdiction fall within the area that is traditionally and culturally affiliated with the Torres Martínez Desert Cahuilla Indians. Additionally, Torres Martinez Desert Cahuilla Indians has created specific requests and formal procedures in accordance with California Assembly Bill 52:

- Formal notice of and information on proposed projects for which your agency will serve as a lead agency under the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq. Pursuant to Public Resources Code section 21080.3.1, subd. (b) shall be sent to Torres Martinez Desert Cahuilla Indians
- Within 14 days of determining that an application for a project is complete or of a decision by your agency to undertake a project, a lead agency must provide formal notification to Cultural Monitoring Coordinator, Michael Mirelez, who is the designated contact and tribal representative for the traditionally and culturally affiliated Torres Martinez Desert Cahuilla Indians regarding notifications pertaining to California Assembly Bill 52

Contact Information:  
*Michael Mirelez*  
*Cultural Resource Coordinator*  
*Torres Martinez Desert Cahuilla Indians*

Address: P.O. Box 1160 Thermal, CA 92274

Office: 760-397-0300 ext:1213

Cell: 760-399-0022

Email: [mmirelez@tmdci.org](mailto:mmirelez@tmdci.org)

This notice shall consist of a formal written letter that includes:

- A description of the proposed project
  - The project's location
  - The lead agency contact information
  - A clear and definitive statement that the tribe has 30 day to request consultation
  - An Aerial Photo of the project Area
  - Copies of the CHRIS Archaeological Record Search
- Once the Torres Martinez Desert Cahuilla Indians has received the notification, we will respond within 30 days as to whether we wish to initiate consultation as prescribed by Public Resources Code section 21080.3.1, subd. (d), the Torres Martinez Desert Cahuilla Indians, may request consultation, as defined by Public Resources Code section 21080.3.1, subd. (b), pursuant to Public Resources Code section 21080.3.2 to mitigate any project impacts a specific project may cause to tribal cultural resources.
- The lead agency shall begin the consultation process within 30 days of receiving the Torres Martinez Desert Cahuilla Indians request for consultation and prior to the release of a negative declaration, mitigated negative declaration, or environmental impact statement.
- Once a review of inadvertent discoveries has been completed by the Cultural Resource Director, all information will then be transferred to the Torres Martinez Desert Cahuilla Indians Tribal Council for a final decision and directive.

Sincerely,

Michael Mirelez  
Cultural Resource Coordinator  
Torres Martinez Desert Cahuilla Indians

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**From:** Brian Lee <BLee@covinaca.gov>  
**Sent:** Tuesday, May 17, 2016 2:43 PM  
**To:** Nancy Fong; Ruta Thomas  
**Subject:** FW: Covina Transit Oriented Mixed-Use Development Project - Environmental Impact Report

FYI...

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**From:** Mehrdaud Kowsari [<mailto:Mehrdaud.Kowsari@sce.com>]  
**Sent:** Tuesday, May 17, 2016 2:38 PM  
**To:** Brian Lee  
**Subject:** Covina Transit Oriented Mixed-Use Development Project - Environmental Impact Report

Hello Mr. Lee,

After reviewing the Notice of Preparation that was sent to us on 5/16/16, we would like to make the following observations / comments:

SCE has overhead electrical facilities (12kV) located along N Citrus Ave, E Covina Blvd, and along the eastern property line. While we don't foresee any negative impacts on SCE facilities, we would advise that all proper precautions be made to ensure that all clearances are maintained and that any request to rearrange SCE facilities be made sufficiently in advance. Thank you.

Mehrdaud Kowsari  
Planner  
Southern California Edison  
Covina Service Center  
800 West Cienega Ave  
San Dimas, CA 91773  
Office# 909-592-3718  
Cell# 909-764-7175  
[mehrdaud.kowsari@sce.com](mailto:mehrdaud.kowsari@sce.com)



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

June 6, 2016

Brian K. Lee, AICP  
Director of Community Development  
City of Covina  
125 E. College Street  
Covina, CA 91723

**RE: Covina Transit Oriented Mixed-Use Development Project-City of Covina-Notice of Preparation of a Draft Environmental Impact Report**

Dear Mr. Lee:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the proposed Covina Transit Oriented Mixed-Use Development Project located at 1162 North Citrus Avenue & 177 East Covina Boulevard. The proposed project would redevelop the project site with a mixed-use development consisting of the Covina Innovation, Technology and Event Center (iTEC), a Transit Center/Park&Ride facility, and a residential development. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

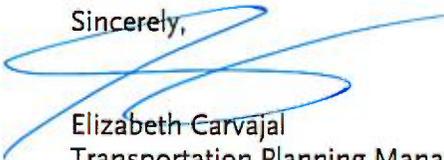
Covina Transit Oriented Mixed-Use Development Project  
Notice of Preparation of a Draft Environmental Impact Report  
LACMTA Comment Letter

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. **LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:**

LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,



Elizabeth Carvajal  
Transportation Planning Manager

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



*Serious Drought.  
Serious drought.  
Help save water!*

June 15, 2016

Mr. Brian K Lee  
City of Covina  
125 E. College Avenue  
Covina, CA 91723

RE: Covina Transit Oriented Mixed-Use  
Development Project  
Vic. LA-10 PM 37.49, LA-210 PM R40.59  
SCH # 2016051053  
IGR/CEQA No. 160527AL-NOP

Dear Mr. Lee

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would redevelop the project site with a mixed-use development consisting of the Covina Innovation, Technology, and Event Center (iTEC), a Transit Center/Park & Ride facility and a residential development.

Caltrans understands that the current General Plan and new transportation performance measures and CEQA thresholds may not be updated to VMT (Vehicle Miles Traveled) at the time. Caltrans is concerned that when traffic generated by the project, along with cumulative traffic is expected to use an off-ramp that is operating at or near capacity, the additional traffic may potentially exceed the off-ramps capacity and back up onto the mainline freeway.

To assist in evaluating the impacts of this project on State transportation facilities, a traffic study should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please refer the project's traffic consultant to Caltrans' traffic study guide Website:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

Listed below are some elements of what is generally expected in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to I-10 and I-210 and all off ramps within the project vicinity. The traffic consultant should work with Caltrans to identify and

confirm off-ramp study locations prior to the preparation of the traffic study. The traffic study should also analyze the storage for left-turn pocket at on/off-ramps if necessary.

2. An off-ramp queuing analysis should be conducted utilizing the Highway Capacity Manual (HCM) queuing analysis methodology with the actual signal timings with some safety factor on the queuing. The analyzed result may need to be calibrated with actual signal timing. Please include mitigation measures if forecasted vehicle queues are expected to exceed available storage capacity.
3. Project travel modeling should be consistent with other regional and local modeling forecasts and travel data. Caltrans uses the indices to verify the results and any differences or inconsistencies must be thoroughly explained. Please submit modeling assumptions for Caltrans review and comment.
4. Trip generation rates for the project should be based on the nationally recognized recommendations contained in "Trip Generation" manual, 9<sup>th</sup> edition, published by the Institute of Transportation Engineers (ITE).
5. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area with and without project. Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions should include build-out of all projects and any plan-horizon years.
6. The analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
7. A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should also be included. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.
8. A fair share contribution toward pre-established or future improvements on the State Highway System is considered acceptable mitigation. (Please see Appendix "B" of the Guide for more information). Please note that for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes, which include build-out of all approved and not yet approved projects and other sources of growth.

Caltrans does not consider the Los Angeles County's CMP analysis alone to be adequate for the analysis of transportation impacts on the State Highway System. A CMP analysis fails to provide adequate information as to the potential cumulative effect of the added traffic. State Routes mentioned in item #1 should be analyzed using methods outlined in the Caltrans's Traffic Impact Study Guide. To help determine the appropriate scope, we suggest that a select zone model run be performed.

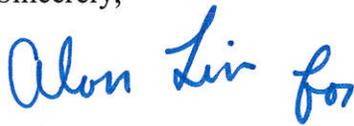
Mr. Brian K Lee  
June 15, 2016  
Page 3

Caltrans encourages the City to work with neighboring developing cities to resolve potential cumulative significant traffic impacts on the State facilities. A plan to work with the neighboring cities should be discussed in the draft Environmental Impact Report.

Although we expect to receive the DEIR from the State Clearinghouse, if you would like to expedite the review process or receive early feedback, please feel free to send a copy of the DEIR directly to our office.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 160527AL.

Sincerely,

A handwritten signature in blue ink that reads "Alan Lin for". The signature is written in a cursive, flowing style.

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: email to Scott Morgan, State Clearinghouse

# GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

*Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."*

## D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

## D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

### D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

### D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

**If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).**

### D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

**D.5.1 Existing Traffic Conditions.** Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

**D.5.2 Selection of Horizon Year and Background Traffic Growth.** Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

## **D.6 PROPOSED PROJECT TRAFFIC GENERATION**

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

## **D.7 TRIP DISTRIBUTION**

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

## **D.8 IMPACT ANALYSIS**

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

**D.8.1 Intersection Level of Service Analysis.** The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

**D.8.2 Arterial Segment Analysis.** For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

**D.8.3 Freeway Segment (Mainline) Analysis.** For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

**D.8.4 Transit Impact Review.** CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - For each time period, multiply the result by one of the following factors:
    - 3.5% of Total Person Trips Generated for most cases, except:
      - 10% primarily Residential within 1/4 mile of a CMP transit center
      - 15% primarily Commercial within 1/4 mile of a CMP transit center
      - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
      - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
      - 5% primarily Residential within 1/4 mile of a CMP transit corridor
      - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
      - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

## D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

**D.9.1 Criteria for Determining a Significant Impact.** For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ). The lead agency may apply a more stringent criteria if desired.

**D.9.2 Identification of Mitigation.** Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

**D.9.3 Project Contribution to Planned Regional Improvements.** If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

**D.9.4 Transportation Demand Management (TDM).** If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

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**D.10 REFERENCES**

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

June 15, 2016

Mr. Brian Lee  
Director of Community Development  
City of Covina, Planning Division  
125 E. College Street  
Covina, CA 91723

**Subject: NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR COVINA TRANSIT ORIENTED MIXED-USE DEVELOPMENT PROJECT**

Dear Mr. Lee:

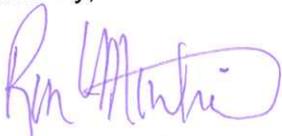
The Southern California Regional Rail Authority (SCRRA) has received the NOP for the DEIR for the Covina Transit Oriented Mixed-Use Development Project. Thank you for the opportunity to comment on key issues relative to SCRRA and operations of the railroad in the vicinity of your project limits. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (METRO), San Bernardino Associated Governments (SANBAG), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

Your project is located about 2 blocks north of the existing Metrolink Covina Station on Citrus Avenue. We are encouraged to see that your project would consist of mixed-use business and residential, along with a Transit Center/Park & Ride component. SCRRA is especially interested in the full development of analysis in the following topic areas:

- Transportation impacts (both permanent and during construction) – including but not limited to traffic queuing on Citrus during construction and lane closures; connectivity and accessibility to and from the existing Metrolink Station.
- Safety impacts (both permanent and during construction) – including but not limited to improved sidewalks to promote safe walking to and from the train station.

Thanks again for allowing us to comment on this NOP. Should you have any questions, please feel free to contact me at (213) 452-0456 or via e-mail at [mathieur@scrra.net](mailto:mathieur@scrra.net).

Sincerely,



Ron Mathieu  
Sr. Public Projects Specialist

