

**FINAL**

**Covina Transit-Oriented Mixed-Use Development  
Project EIR**

*Prepared for:*

**City of Covina**  
126 East College Street  
Covina, California 91723  
*Contact: Brian K. Lee, AICP*

*Prepared by:*

**DUDEK**  
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*Contact: Ruta K. Thomas, REPA*

**NOVEMBER 2016**



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## ACRONYMS AND ABBREVIATIONS

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Acronym/Abbreviation	Definition
CD	compact disc
CEQA	California Environmental Quality Act
City	City of Covina
CMP	Congestion Management Plan
EIR	environmental impact report
GHG	greenhouse gas
HVAC	heating, ventilation, and air conditioning
I-	Interstate
ITEC	Innovation, Technology, and Event Center
LACFD	County of Los Angeles Fire Department
LID	Low Impact Development
LOS	Level of Service
LST	localized significance threshold
MLC	MLC Holdings, Inc./Meritage Homes
MMRP	Mitigation Monitoring and Reporting Program
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
OPR	Office of Planning and Research
PCB	polychlorinated biphenyl
PRIMP	Paleontological Resources Impact Mitigation Program
SCAQMD	South Coast Air Quality Management District
SCRRA	Southern California Regional Rail Authority
SEJA	SoCal Environmental Justice Alliance
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontology
TPH	total petroleum hydrocarbon
UST	underground storage tanks
VOC	volatile organic compound

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# CHAPTER 1

## PREFACE

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### 1.1 PURPOSE

This Final Environmental Impact Report (EIR) has been prepared by the City of Covina (City) for the Covina Transit-Oriented Mixed-Use Development Project (project or proposed project). This Final EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.).

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR. The City has the principal responsibility for approval of the proposed project and is therefore considered the lead agency under CEQA Section 21067. According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the Draft
- Comments and recommendations received on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency

### 1.2 FORMAT OF THE FINAL EIR

This Final EIR consists of the September 2016 Draft EIR and the following four chapters:

**Chapter 1 – Preface.** This chapter summarizes the contents of the Final EIR, the environmental review process, and several minor updates that occurred in the Draft EIR subsequent to the release of the Draft EIR for public review.

**Chapter 2 – Response to Comments.** During the public review period for the Draft EIR, several comment letters were received. This chapter contains these comment letters and the City’s responses to the comments.

**Chapter 3 – Errata.** Several of the comments that are addressed in Chapter 2.0 resulted in minor revisions to the information contained in the September 2016 Draft EIR. These revisions are shown in strikeout and underline text in this chapter.

**Chapter 4 – Mitigation Monitoring and Reporting Program.** This section of the Final EIR provides the mitigation monitoring and reporting program (MMRP) for the proposed project.

The MMRP is presented in table format and identifies mitigation measures for the proposed project, the implementation period for each measure, the implementing party, and the enforcing agency. The MMRP also provides a section for recordation of mitigation reporting.

### **1.3 ENVIRONMENTAL REVIEW PROCESS**

#### **Notice of Preparation**

The City determined that an EIR would be required for the proposed project and issued a Notice of Preparation (NOP), which was distributed to the State Clearinghouse, interested agencies, and groups on May 16, 2016. Pursuant to Section 15082 of the CEQA Guidelines, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. The 30-day NOP public review period ended June 14, 2016. Comments received during the NOP public review period were considered during the preparation of this EIR. The NOP and NOP comments are included in Appendix A of the Draft EIR.

#### **Noticing and Availability of the Draft and Final EIR**

The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. The 45-day public review period for the Draft EIR started on September 13, 2016, and ended on October 27, 2016. At the beginning of the public review period, 15 copies of the Draft EIR and one copy of the Notice of Completion (NOC) were submitted to the State Clearinghouse. Relevant agencies also received electronic copies of the documents. A Notice of Availability (NOA) and a copy of the Draft EIR on compact disc (CD) were distributed to 18 interested parties. The NOA was filed with the Los Angeles County Clerk and published in the San Gabriel Valley Tribune newspaper on September 13, 2016. The NOA described where the document was available and how to submit comments on the Draft EIR. The NOA and Draft EIR were also made available for public review at the Covina City Clerk's office (125 College Street, Covina, California, 91723), at the Covina Public Library (234 North Second Avenue, Covina, California, 91723), and on the City's website. The 45-day public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents of the Draft EIR.

The Final EIR addresses the comments received during the public review period and includes minor changes to the text of the Draft EIR in accordance with comments that necessitated revisions. This Final EIR will be presented to the City Council for potential certification as the environmental document for the proposed project. All persons who commented on the Draft EIR will be notified of the availability of the Final EIR, and all agencies who commented on the Draft EIR will be provided with a copy of the Final EIR, pursuant to CEQA Guidelines Section 15088(b). The Final EIR will also be posted on the City's website: at <http://www.covinaca.gov/pc/project/covina-itec-transit-oriented-mixed-use-development-sch2016051053>.

Pursuant to CEQA Guidelines Section 15091, the City shall make findings for each of the significant effects identified in this EIR and shall support the findings with substantial evidence in the record. After considering the Final EIR in conjunction with making findings under Section 15091, the lead agency may decide whether or how to approve or carry out the project. When a lead agency approves a project that will result in the occurrence of significant effects that are identified in the Final EIR but are not avoided or substantially lessened, the agency is required by CEQA to state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. This “statement of overriding considerations” must be supported by substantial evidence in the record and is prepared pursuant to CEQA Guidelines Section 15093. The Final EIR for the proposed project identified potentially significant effects that could result from project implementation. However, the City finds that the inclusion of certain mitigation measures as part of project approval will reduce all of the potentially significant effects to less than significant. As such, a statement of overriding considerations prepared pursuant to CEQA Guidelines Section 15093 is not required for this project.

## **1.4 REVISIONS TO THE DRAFT EIR**

The comments received during the public review period for the Draft EIR resulted in several minor clarifications and modifications in the text of the September 2016 Draft EIR. In addition, minor editorial corrections have been made in sections of the Draft EIR. These changes are included as part of the Final EIR, to be presented to City decision makers for certification and project approval.

CEQA Guidelines Section 15088.5 sets forth requirements for why a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. Information includes changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The minor clarifications, modifications, and editorial corrections that were made to the Draft EIR are shown in Chapter 3.0 of this Final EIR. None of the revisions that have been made to the EIR resulted in new significant impacts; none of the revisions resulted in a substantial increase in the severity of an environmental impact identified in the Draft EIR; and, none of the revisions brought forth a feasible project alternative or mitigation measure that is considerably different from those set forth in the Draft EIR. Furthermore, the revisions do not cause the Draft EIR to be so fundamentally flawed that it precludes meaningful public review. As none of the CEQA criteria for recirculation have been met, recirculation of the EIR is not warranted. As stated in CEQA Guidelines Section 15088.5(b), “recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

## CHAPTER 2 RESPONSE TO COMMENTS

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A draft version of the Environmental Impact Report (EIR) for the proposed project was circulated for public review from September 13, 2016, to October 27, 2016. This chapter of the Final EIR includes a copy of each comment letter provided during the 45-day public review period for the Draft EIR. The City of Covina (City) has prepared responses to each comment, which are included in this chapter. The comments have each been given an alphanumeric label, and the individual issues within each comment letter are bracketed and numbered. The City’s responses to comments on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the CEQA Guidelines, the City is required to evaluate and provide written responses to comments received on the Draft EIR (CEQA Guidelines, Section 15088).

The City received comment letters from five agencies and three organizations (including private entities). One letter from a community member was also received. Table 1 provides an index to the comment letters that were received. To finalize the EIR for the proposed project, responses have been prepared to comments that were received during the public review period. In accordance with the requirements of CEQA Guidelines Section 15088(b), the City will provide a written response on comments submitted by public agencies to each respective public agency at least 10 days prior to certifying the Final EIR.

**Table 2-1  
List of Commenters**

Comment Letter	Name	Type	Address
A	Philip Siongco	Community Member	1246 North Citrus Avenue, Covina, California 91722
B	County of Los Angeles Fire Department	Agency	5823 Rickenbacker Road, Commerce, California 90040
C	Citrus Valley Health Partners	Organization	140 West College Street P.O. Box 6108, Covina, California 91723
D	Southern California Regional Rail Authority	Agency	Planning Department, One Gateway Plaza, Floor 12, Los Angeles, California 90012
E	California Department of Transportation – District 7	Agency	Office of Transportation Planning, 100 South Main Street, MS 16, Los Angeles, California 90012
F	SoCal Environmental Justice Alliance	Organization	Blum Collins LLP, Aon Center, 707 Wilshire Boulevard Suite 4880, Los Angeles, California 90017
G	Covina Chamber of Commerce	Organization	935 West Badillo Street, Suite 100, Covina, California 91722
H	Governor’s Office of Planning and Research – State Clearinghouse Planning Unit	Agency	1400 Tenth Street, Sacramento, California 95812
I	Covina-Valley Unified School District	Agency	519 East Badillo Street, Covina, California 91723

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Comment Letter A

1246 N. Citrus Ave.  
Apt. 4  
Covina, CA 91722



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

Subject: Comment to Draft Covina Transit-Oriented Mixed-Use Development Project EIR

Dear Mr. Lee:

I am a neighboring resident and would like to comment on the proposed Covina iTEC transit Oriented Mixed-Use Development at the former K-Mart site north of E. Covina Blvd. and east of N. Citrus Avenue.

I currently live north of the site and am concerned that the City of Covina's transit Center and Park and Ride facility will attract additional security concerns and noise to my residence due to the increase in vehicle and pedestrian traffic.

I would like the City of Covina to consider that my townhome property on 1246 N. Citrus Ave. already has trespassers going through our dumpsters. We've have had meetings with our HOA regarding our private security patrols, illegal dumping, theft and destruction of property. We have contacted the City of Covina Police Department and am concern that the transit project will cause additional dumping, homeless trespassing, loitering, and theft on our residential property.

-Please consider another location for the Park and Ride that would be closer to Arrow Highway, Azusa Ave, and Downtown Covina. I'd rather have an increase in the area of the residential development project since the neighbors are residential.

-Increase bus traffic from and to Citrus Ave. and Covina Blvd. needs to be visible to drivers and pedestrians at night via medians and signs. The increase in noise from bus traffic needs to be mitigated.

-Install as many CCTV cameras and increase police patrols to monitor the Park and Ride for security, prevent any overnight parking or neighboring residential overflow parking to prevent trespassers or an unsafe or trashed parking structure.

A-1  
A-2  
A-3  
A-4  
A-5

-The architects/company did not outline the needed extra parking for visitors of the future condo residents, when they have weekend parties or overnight excess parking. It will surely cause them to park on the main streets of Citrus Ave. or Covina Blvd.

A-6

-I walk along Citrus Avenue regularly and wish that the sidewalk is brightly lit and wider for pedestrians, bicyclists, and motorists with appropriate landscaping and removal of the high voltage electrical lines.

A-7

I do appreciate the residential development and potential Community Event Center on the north side and that the City is considering alternatives than leaving the former K-Mart vacant. Covina Police has done a great job in responding to calls and patrolling the neighborhood. I hope the project does not burden the police and their hard work.

A-8

Thanks to you, your staff, Foothill Transit, and Covina Police for hosting the program Sep. 10 at the site and an opportunity to hear the neighbors' concerns. I'm hopeful the City completes a project that considers the safety of residents and their homes.

A-9

Sincerely,



Philip Siongco

## Response to Comment Letter A

**Philip Siongco**  
**September 21, 2016**

- A-1** This comment is introductory in nature. It expresses concerns regarding security, noise, and traffic associated with the proposed project. These concerns are further described in Comments A-2 through A-8 and are, therefore, addressed in the responses below.
- A-2** This comment states that the residents in the townhomes north of the project site have had complaints and concerns regarding trespassers, illegal dumping, theft, and destruction of property. The comment expresses concern that the proposed Transit Center and Park and Ride Facility would cause additional dumping, trespassing, loitering, and theft at the residential properties north of the project site.

A project's potential to trigger dumping, trespassing, loitering, and/or theft is not an impact to the environment that is evaluated under CEQA. However, environmental analyses under CEQA must evaluate whether a proposed project would place increased demand on police protection services such that new or physically altered police facilities are required, the construction of which could cause environmental impacts. As such, the proposed project's effects on police protection services is addressed in Section 3.14 of the Draft EIR. To support the environmental analysis in the Draft EIR, the Covina Police Department was contacted and provided with a project summary and a list of questions to address the issue of police protection under CEQA. The Covina Police Department verified that the proposed project is not anticipated to result in new facilities. As such, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, and impacts resulting from the proposed project would be less than significant. Furthermore, the proposed project would be required to pay a variety of development fees to the City, some of which would help provide funding for additional police officers and police protection equipment, in the event that the Covina Police Department determines that such resources are needed at a future time. As with many public service providers, the Covina Police Department evaluates its service needs, and resources are expanded or reassigned as necessary to meet increases in service demands.

As stated in Section 3.14, in coordination with the Covina Police Department, the proposed project would incorporate defensible design practices, which would include on-site security services, lighting within the proposed parking structure, wayfinding signage, use of transparent materials for the transit shelter, lighting within the shelter to eliminate secluded areas, seating at the transit shelter that is not conducive to

sleeping, and security cameras linking with the Covina Police Department’s City-wide system. Design practices that support safety and security at the project site are expected to lessen the potential for safety and security concerns attributable to the proposed project at neighboring properties.

In summary, while dumping, trespassing, loitering, and/or theft on the project site and on nearby properties are not effects that are required to be analyzed under CEQA, these potential issues are nevertheless being addressed in coordination with the Covina Police Department. Furthermore, the comments and concerns expressed in this letter regarding security at the residential properties north of the project site will be included in the Final EIR for review and consideration by decision makers.

**A-3** This comment requests that the City consider another location for the proposed Park & Ride component of the project. Specifically, the comment suggests a location closer to Arrow Highway, Azusa Avenue, and downtown Covina. This comment also includes a suggestion of increasing the area of residential development within the project site in place of the Park & Ride component, to increase the project’s consistency with the land uses to the north.

The City considered the potential for alternative locations for the proposed project, pursuant to Section 15126.6(f)(2) of the CEQA Guidelines. As explained and substantiated in Section 4.1.2 of the Draft EIR, alternative locations were ultimately eliminated from detailed consideration in the EIR due to failure to meet project objectives, infeasibility, and inability to avoid impacts of the project. See Section 4.1.2 for substantiation on each of these reasons.

The City evaluated the consistency of the proposed project with applicable land use plans and policies (see Section 3.10, Land Use and Planning, and Appendix F, Land Use Consistency Table, in the Draft EIR). The analysis included an evaluation of whether or not the proposed project is consistent with General Plan policies, many of which address compatibility of development with land uses, especially adjacent residential land uses or other sensitive land uses. The analysis in the Draft EIR determined that the proposed project is consistent with General Plan policies. As stated in Appendix F, the design of the project would be sensitive to adjoining residential land uses and would ensure that the proposed uses would be compatible with adjacent land uses. Furthermore, as stated in Appendix F, the design of the project combined with the mitigation measures set forth throughout Chapter 3.0 of the Draft EIR would minimize noise, light, trash, visual and environmental disturbances, and traffic in nearby residential areas. As such, the proposed project would be

consistent with applicable land use plans and policies and would not introduce an incompatible land use to the project area.

This comment specifically states that replacing the proposed Park & Ride facility with residential uses in the project design would enhance the consistency of the project with neighboring properties. However, as shown in Figure 2-4 in the Draft EIR, the Park & Ride facility has been situated in the southwestern portion of the project site, such that the proposed townhomes abut the existing townhomes to the north. It should be noted that under existing conditions, the entirety of the project site is zoned for commercial uses (specifically, for a regional or community shopping center). As such, development of townhome units in the northern section of the project site under the proposed project would ensure greater consistency with adjacent residential uses relative to the uses that are currently allowable on the project site, per the existing zoning designation. Furthermore, note that no significant and unavoidable impacts have been identified in the Draft EIR due to the location of the Park & Ride facility in the southern section of the project site. As such, replacing the Park & Ride facility with more townhome units would not avoid or reduce any potentially significant impacts of the proposed project.

As explained in Section 4.1.2, the location of the proposed project is instrumental in closing the transportation gap between the Metro Gold Line, the Covina Metrolink Station, and the Interstate (I-) 10 freeway. The alternative location for the Park & Ride suggested in this comment letter would not close this transportation gap. The project site is located directly north of the Covina Metrolink Station and directly south of the current terminus of the Metro Gold Line. Both facilities are located along North Citrus Avenue. This comment letter suggests a location of the Park & Ride that is closer to Arrow Highway, Azusa Avenue, and downtown Covina. Azusa Avenue is similar to Citrus Avenue in that it is north-south four lane roadway with connections to the I-210 and the I-10. However, Azusa Avenue is already supported by numerous transit stops, while fewer transit facilities are provided along North Citrus Avenue under existing conditions. Also, while a Metro Gold Line station is located along Azusa Avenue in Azusa, there is no Metrolink Station along this roadway. As such, situating a Park & Ride facility near Arrow Highway and Azusa Avenue would not support the objective of closing the transportation gap between the Covina Metrolink Station and the Metro Gold Line. This comment also mentions situating the proposed Park & Ride facility in downtown Covina. Downtown Covina is considered to be the area located near the intersection of East San Bernardino Road and North Citrus Avenue. This area is supported by the Covina Metrolink Station and numerous transit lines. Placing the proposed Park & Ride in downtown Covina would not support the objective of closing the transportation gap between the Covina Metrolink Station and the Metro Gold Line.

The Draft EIR set forth and evaluated a reasonable range of alternatives, in accordance with Section 15126.6 of the CEQA Guidelines, and the alternatives recommended in this comment letter would not avoid or substantially lessen the significant effects of the project. Nevertheless, the suggestion of considering a different location for the Park & Ride facility and the suggestion to replace the Park & Ride component of the proposed project with residential uses will be included in the Final EIR for review and consideration by decision makers.

**A-4** This comment expresses concern regarding visibility of bus traffic at night. This comment also states that the increase in noise from bus traffic needs to be mitigated.

The proposed project has been designed to separate bus traffic from automobiles and to minimize cross-traffic between cars, buses, and pedestrians. Buses would use driveways along Covina Boulevard and Citrus Avenue to access the bus depot. The bus depots (i.e., the pickup and drop-off areas) would be located on the interior of the project site in a dedicated bus lane (see Figure 2-4 in the Draft EIR). While the proposed project would add one bus line to the area (the Covina Express Line), the existing local line 281 currently extends along Citrus Avenue, with stops located at the corner of Citrus Avenue and Covina Boulevard. As such, bus traffic is a component of the existing conditions within the project area. The number of buses and frequency of stops associated with line 281 would not change under the proposed project. Rather, under the proposed project, the buses would stop at the bus depots within the project site instead of stopping at the existing transit stops along Citrus Avenue. Buses stopping at the dedicated bus depots within the project site are expected to result in fewer conflicts with traffic along Citrus Avenue relative to existing conditions. However, the proposed Covina Express Line would add new bus traffic to the project area. As explained in Chapter 2.0 of the Draft EIR, the Covina Express Line would operate between 5:30am and 8:30am and again between 3:00pm and 7:00pm, Monday through Friday. The Covina Express Line would be comprised of three buses per hour during the peak times. As such, the change in bus traffic caused by the proposed project would not be substantial and the increases in bus traffic would be limited to peak commuter times, during which traffic noise is already elevated. Overall, development of the proposed project would preclude buses from pulling over along Citrus Avenue by providing the proposed bus depot area. Buses would use headlights and turn indicators as required, which would allow for nighttime visibility. As stated in Section 3.10 of the Draft EIR, vehicular access to the project site would be designed to ensure minimum conflict between pedestrians, automobiles, and service vehicles. Site lines, pedestrian walkways and lighting will be provided and vehicular entrances would be well lit.

A traffic impact analysis has been conducted for the proposed project, which includes an analysis of the function of the project site's access points, including the two entrances to the bus depot area. The traffic study concluded that upon implementation of the proposed project, all project accesses would operate at an acceptable level of service at the time of project buildout and under long-term cumulative growth conditions (2036 conditions). See Appendix H for details. As such, bus traffic is not anticipated to create hazardous roadway conditions, and the proposed project has been designed to preclude conflicts between vehicular and pedestrian traffic.

Noise associated with the proposed project is addressed in Section 3.12 of the Draft EIR. The noise analysis evaluated the operation noise of the proposed Transit Center and Park & Ride facility, including noise from the arrival of buses. Based upon noise measurements conducted at a similar facility, noise levels from the proposed Transit Center and Park & Ride facility during peak commute hours (early morning and early evening hours) are anticipated to be approximately 63 dBA Leq at a distance of 30 feet<sup>1</sup> (see Section 3.12.1 of the Draft EIR for details). The proposed parking structure associated with the Park & Ride facility is situated approximately 30 feet from the nearest residential property boundary to the east. Noise from the upper floors of the parking structure has the potential to cause a significant impact at the residences east of the project site. However, the Draft EIR identified mitigation that would be implemented that would reduce this impact to a level below significance. The Draft EIR also examined the potential for the proposed project as a whole to generate an increase in off-site traffic noise levels. Impacts were determined to be less than significant. See Section 3.12 of the Draft EIR for substantiation of these environmental impact conclusions.

- A-5** This comment provides security recommendations for the proposed project, including installing cameras, increasing police patrols to monitor the Park & Ride facility, and disallowing overnight parking or residential parking.

Security concerns are discussed in Response A-2. Additionally, Foothill Transit is working with the Covina Police Department to install a real time surveillance camera system for the Transit Center and Park & Ride Facility parking structure. Any unauthorized parking in the parking structure will be monitored and applicable parking rules will be enforced. If unauthorized vehicles or suspicious activity is observed on the real time surveillance camera system, the Covina Police Department

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<sup>1</sup> Leq is a noise metric used to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. Leq uses units of dbA, which is the A-weighted decibel scale. Section 3.12.1 of the Draft EIR contains more information on noise metrics and measurement units.

will have the ability to use a one-way voice command system to instruct the unauthorized vehicle to leave the premises. If the unauthorized vehicle does not leave the premises or suspicious activity is observed, police services would be dispatched to the project site immediately.

- A-6** This comment states that visitor parking for the residential component of the project was not identified. The comment expresses concern that visitors of the new residences will park on Citrus Avenue or Covina Boulevard.

As stated in Chapter 2.0 of the Draft EIR, the residential component of the proposed project would include two attached garage parking spaces for each unit (up to 240) and approximately 0.58 on-site guest parking stalls per unit (up to 69), for a total of approximately 300 spaces. As stated in Chapter 2.0 of the Draft EIR, parking would be provided consistent with mixed-use, transit-oriented standards and would comply with the project's specific plan and zoning requirements. Visitors to the proposed townhomes are anticipated to use the on-site guest parking stalls rather than on-street parking along Citrus Avenue or Covina Boulevard. According to Section 17.72.010 of the City's Municipal Code, guest parking for multi-family residential units is required at a rate of one space per every five units. Credit for guest parking spaces is allowed for street frontages on which parking is allowable and which abut the property line of the multi-family residential development. Excluding any credits for the site's street frontages, the proposed project would be required to provide 24 guest parking spaces. The number of proposed on-site guest parking stalls for the proposed project (approximately 69 stalls) does not include any credits for the site's street frontages and exceeds code requirements by 45 stalls.

- A-7** This comment expresses a wish that the sidewalk along Citrus Avenue would be brightly lit and wider and would have appropriate landscaping. This comment also request removal of the high voltage electrical lines. These requests for streetscape improvements along Citrus Avenue do not pertain to the environmental analysis in the EIR. However, the condition of approval for street improvements will include new sidewalks with landscaping strips, as well as appropriate street lights. The commenter's requests for streetscape and sidewalk improvements will be included in the Final EIR for review and consideration by decision makers.

- A-8** This comment expresses appreciation for the residential and iTEC components of the project, as well as the overall efforts to revitalize the project site. This comment also expresses a hope that the proposed project does not create a burden on the Covina Police Department.

See Response A-2 for information on security design practices that would be incorporated into the project. As described in Section 3.14 of the Draft EIR, these design practices are anticipated to reduce the need for police protection services at the project site. Also see Response A-2 for information about impacts to police protection services.

**A-9** This comment expresses hope that the project is designed in consideration of the safety of residents and homes.

Security concerns are addressed in Response A-2. Traffic safety is addressed in Response A-4. As described in these responses, design practices have been incorporated into project design to minimize safety and security issues.

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Comment Letter B



COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

October 4, 2016



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

Dear Mr. Lee:

PUBLIC NOTICE OF THE AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT, SCH 2016051053, "COVINA TRANSIT-ORIENTED MIXED-USE DEVELOPMENT PROJECT," IT WOULD REDEVELOP THE PROJECT SITE WITH MIXED-USE DEVELOPMENT CONSISTING OF THE COVINA INNOVATION, TECHNOLOGY, AND EVENT CENTER, A TRANSIT CENTER/PARK AND RIDE FACILITY AND A RESIDENTIAL DEVELOPMENT, 1162 N. CITRUS AVE., COVINA, FFER 201600162

The Public Notice of the Availability of the Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

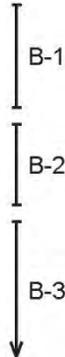
We have no comments.

LAND DEVELOPMENT UNIT:

The Land Development Unit is reviewing the proposed "Covina Transit-Oriented Mixed-Use Development Project" development and implementation for access and water system requirements.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELLFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, EL MONTE, GARDENA, GLENNDORA, HAWAIIAN GARDENS, HAWTHORNE, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRWINDALE, LA CANADA-FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWDALE, LOMITA, LYNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER



Brian K. Lee, Director  
October 4, 2016  
Page 2

The Land Development Unit comments are only general requirements. Specific fire and life safety requirements will be addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

**CONDITIONS OF APPROVAL – ACCESS**

All on-site Fire Apparatus Access Roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.

Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.

All fire lanes shall be clear of all encroachments, and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.

The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.

For building's 30 feet or less, provide a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building. Fire Code 503.1.1 and 503.2.2.

For building's greater than 30 feet, provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Apparatus Access Road is more than 30 feet high or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2.

The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.



B-3  
Cont.

Brian K. Lee, Director  
October 4, 2016  
Page 3

Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. Fire Code 503.2.4.

Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 pounds, and shall be surfaced so as to provide all-weather driving capabilities. Fire apparatus access roads having a grade of 10 percent or greater shall have a paved or concrete surface. Fire Code 503.2.3.

Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads to clearly indicate the entrance to such road or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3.

A minimum five foot wide approved firefighter access walkway leading from the Fire Department access road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Fire Code 504.1.

Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.

Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Fire Code 504.5.

**CONDITIONS OF APPROVAL – WATER SYSTEM REQUIREMENTS**

All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Department Regulation 8.

B-3  
Cont.

Brian K. Lee, Director  
October 4, 2016  
Page 4

All required PUBLIC fire hydrants shall be installed, tested and accepted prior to beginning construction. Fire Code 501.4.

All private on-site fire hydrants shall be installed, tested and approved prior to building occupancy. Fire Code 901.5.1.

All on-site fire hydrants shall be installed a minimum of 25' feet from a structure or protected by a two hour rated firewall. Exception: For fully sprinkled multi-family structures on-site hydrants may be installed a minimum of 10 feet from the structure. Indicate compliance prior to the project being "cleared" for public hearing. Fire Code Appendix C106.

Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation. Fire Code 901.2 and County of Los Angeles Fire Department Regulation 7.

The required fire flow for the public fire hydrants and on-site fire hydrants for this project is 8000 gpm at 20 psi residual pressure for 4 hours. Three public fire hydrants flowing simultaneously may be used to achieve the required fire flow. Fire Code 507.3 and Appendix B105.1.

a. The fire flow is subject to reduction.

An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

#### Public Fire Hydrants

Install two public fire hydrants as noted by the Fire Department on Citrus Avenue.

- b. Provide the fire flow test for one existing public fire hydrant on Covina Blvd.
- c. Relocate one existing public fire hydrant on Citrus Avenue as noted by the Fire Department.

#### On-Site Fire Hydrants

- a. Install three on-site fire hydrants as noted on the site plan by the Fire Department.

B-3  
Cont.

Brian K. Lee, Director  
October 4, 2016  
Page 5

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

B-4

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department previously provided our comments regarding this project in June 2016. At this time, HHMD advises that any underground storage tanks (USTs) encountered at the site would be under the jurisdiction of the Los Angeles County Department of Public Works, Environmental Programs Division, UST Program.

B-5

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

KTJ:

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## Response to Comment Letter B

### County of Los Angeles Fire Department October 4, 2016

- B-1** This comment states that the Notice of Availability of the Draft EIR for the proposed project was reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department (LACFD). No response is required.
- B-2** This comment states that the Planning Division of the LACFD has no comments. No response is required.
- B-3** This comment provides general design requirements for the proposed project, including access requirements and water system requirements. This comment states that the information provided is general in nature and that specific fire and life safety requirements would be addressed during the building and fire plan check process. The comment states that additional requirements may be specified at that time. The proposed project is required to comply with LACFD regulations, and compliance would be verified during the building and fire plan check process.
- B-4** This comment lists the statutory responsibilities of the Forestry Division (erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance). These issue areas have been addressed in the Draft EIR, and impacts to these issue areas would not be significant (see Sections 3.4, 3.5, 3.6(b), 3.8(h), and 3.9(c) of the Draft EIR for details).
- B-5** This comment, provided by the Health Hazardous Materials Division of the LACFD, states that the division previously provided comments regarding the project in June 2016. The Health Hazardous Materials Division advises that removal of underground storage tanks (USTs) at the site be conducted under the jurisdiction of the Los Angeles County Department of Public Works, Environmental Programs Division, UST Program. As described in Section 3.8 of the Draft EIR, the proposed project would involve removal of USTs at the project site in accordance with applicable regulations. Mitigation measure MM-HAZ-2 has been revised to identify the Los Angeles County Department of Public Works, Environmental Programs Division, UST Program as the authorizing jurisdiction for UST removal activities.

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Comment Letter C



Planning Division  
City of Covina  
OCT 24 2016  
125 E. College Street  
(626) 858-1231

October 20, 2016

Covina Planning Commission  
Charles Hodapp, Chair  
125 E. College St.  
Covina, CA 91723

RE: Support for the Proposed Covina Forward Development

Dear Chairman Hodapp,

On behalf of Citrus Valley Health Partners (CVHP), I am writing to express our support for the Covina Forward project.

The Covina Forward project will help make Covina a regional destination and will positively impact our local economy. This project will not only improve a visibly prominent location in Covina, it will also provide services to residents, complement existing businesses and create new business opportunities. This project will provide additional transportation opportunities for our community by offering the first/last mile connection between the Citrus College/APU Metro Gold Line Station in Azusa and the Downtown Covina Metrolink Station via the local Foothill Transit service.

As medical providers in this area, we highly value innovation in our community. We believe that this represents a truly innovative project for the City and will only enhance the Covina area as a destination for people to visit. In addition, the Covina Forward project will enable Covina to evolve and address the growing need for innovation, housing and transit options.

We are excited that this project will help Covina become a regional destination and look forward to seeing Covina Forward come to fruition.

Sincerely,

Martin Kleinbart, DPM  
Chief Strategy Officer

140 West College Street • P.O. Box 6108 • Covina, CA 91722-5108  
www.cvhp.org

Citrus Valley Medical Center – Inter-Community Campus & Queen of the Valley Campus,  
Foothill Presbyterian Hospital and Citrus Valley Hospice

C-1

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## **Response to Comment Letter C**

**Citrus Valley Health Partners  
October 20, 2016**

- C-1** This comment expresses support for the proposed project. No response is required. This comment will be included in the Final EIR for review and consideration by decision makers.

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Comment Letter D



Southern California Regional Rail Authority

October 25, 2016

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

**Subject: 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 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 1/2 mile north of the existing Metrolink Covina Station on Citrus Avenue. We are encouraged to see that one of the objectives on your project is to close the north/south transportation gap connecting the I-10 freeway to the Covina Metrolink Station and Metro Gold Line to the north.

General comments on the EIR include the following:

1. **Section 3.4 Existing Transit Services** (Page 18), please also include Metrolink, San Bernardino Line – San Bernardino to Downtown Los Angeles.
2. **Figure 3.2-1**, please include the rail lines and Covina Metrolink Station on the map of Existing Conditions.
3. **Executive Summary (ES-3)**, an additional objective of City and Foothill Transit could be to "Provide additional feeder service connections to the Covina Metrolink Station for mobility options".
4. **EIR Distribution List**, Contact for Metrolink would be Planning Department and address is One Gateway Plaza, 12<sup>th</sup> floor, Los Angeles, CA 90012.



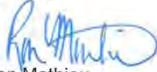
One Gateway Plaza, Floor 12 Los Angeles, CA 90012 T (213) 452.0200

metrolinktrains.com

Mr. Brian Lee  
October 25, 2016  
Page 2

Thanks again for allowing us to comment on this DEIR. 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

Cc: Elizabeth Carvajal, Metro  
Dana Tinio, Metro  
Jay Fuhrman, Metro  
Roderick Diaz, SCRRRA  
Naresh Patel, SCRRRA

↑  
D-4  
Cont.

## Response to Comment Letter D

### Southern California Regional Rail Authority October 25, 2016

- D-1** This comment provides background information on the Southern California Regional Rail Authority (SCRRA) and lists its member agencies. No response is required.
- D-2** This comment states that the project site is located approximately 0.5 mile north of the existing Covina Metrolink Station located on Citrus Avenue. The comment expresses support for the project objective that involves closure of the north/south transportation gap and for the connections that the proposed project would provide between the I-10 freeway, the Covina Metrolink Station, and the Metro Gold Line station. This comment expresses support for the project's ability to close an existing transportation gap; no response is required.
- D-3** This comment consists of three requests and suggestions for revisions in the EIR. The requested and suggested revisions are minor modifications and clarifications that do not affect the analysis in the Draft EIR. However, these revisions have been made to the Draft EIR in order to clarify information regarding Metrolink services in the project area. These revisions do not constitute significant new changes resulting in a need to recirculate the EIR. The three requests for revisions and how these requests have been incorporated into the Final EIR are described as follows:
- The SCRRA requests that information on existing transit services in the project area that is listed on page 18 of the Traffic Impact Study (Appendix H of the Draft EIR) be revised to include Metrolink's San Bernardino – San Bernardino to Downtown Los Angeles line. Section 3.16, Transportation/Traffic, also contains the same list of transit services as page 18 of the Traffic Impact Study. Section 3.16 has been revised to include a description of the existing rail service in the project area. See Chapter 3.0 of this Final EIR, which shows these revisions in underlined text.
  - The SCRRA requests that existing rail lines and the Covina Metrolink Station be shown on Figure 3.2-1 in the Traffic Impact Study (Appendix H of the Draft EIR). This same figure is also shown in Section 3.16 of the Draft EIR and is labeled as Figure 3.16-1 in Section 3.16. In response to this comment, a narrative description of the location of existing rail lines and the Covina Metrolink Station and their proximity to the project site has been added to the EIR, in lieu of a figure providing this information. See Chapter 3.0 of this Final EIR, which shows this revision in underlined text.

- The SCRRA suggests an additional objective that could be incorporated by the City and/or Foothill Transit in their respective lists of project objectives. The suggested objective is “Provide additional feeder service connections to the Covina Metrolink Station for mobility options.” Foothill Transit is in discussions with Metrolink about feeder service connections, as it relates to the proposed project.

**D-4** This comment provides contact information for Metrolink. In accordance with the requirements of CEQA Guidelines Section 15088(b), the City will provide a written response to the SCRRA’s comments on the Draft EIR to the address provided in this comment letter at least 10 days prior to certifying the Final EIR. In the event that the City has any further questions for Metrolink, the contact information provided in this comment will be used.

Comment Letter E

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-8391  
FAX (213) 897-1337  
www.dot.ca.gov



Serious drought.  
Help save water!

October 27, 2016

Mr. Brian K. Lee  
City of Covina  
125 East College Street  
Covina, CA 91723

RE: Covina Transit-Oriented Mixed-Use  
Development Project  
Vic. LA-10/PM 37.49, LA-210/PM R40.59  
SCH # 2016051053  
Ref. IGR/CEQA No. 160527AL-NOP  
GTS # LA-2016-00149AL-DEIR

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 (120 units).

E-1

Senate Bill 743 (SB 743) (2013) mandated that CEQA review of transportation impacts of proposed development be modified by eliminating consideration of delay- and capacity- based metrics such as Level of Service (LOS) and instead focusing analysis on another metric of impact. The Governor's Office of Planning and Research (OPR) is currently updating its CEQA Guidelines to implement SB 743 ([https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php)) and is proposing that vehicle miles traveled be the primary metric used in identifying transportation impacts.

OPR has released a separate "Technical Advisory" outlining recommended techniques for measuring impacts with this new metric, which applies statewide. General Plan Guidelines ([https://www.opr.ca.gov/s\\_generalplanguidelines.php](https://www.opr.ca.gov/s_generalplanguidelines.php)) are also concurrently being updated to align with state policy, including SB 743.

E-2

The City should refer the project's traffic consultant to OPR's website, guidelines on evaluating transportation impacts in CEQA:

[https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf)

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. During the transition, Caltrans will assist the City in preparing future traffic studies and will provide comment accordingly if LOS is still

*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

Mr. Brian K. Lee  
 October 27, 2016  
 Page 2

in use. After reviewing the Traffic Impact Study that was submitted, Caltrans has the following comments:

The project will generate a net 2,072 daily trips and 313/275 AM/PM peak hour trips. The project site is about 1.5 miles away from I-210 and I-10. As a result, the City should anticipate many trips including other agencies' cumulative project trips utilizing the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future with other agencies.

For future projects, please use the following link in reference to Caltrans guide when a traffic impact study is needed, if Vehicle Miles Traveled (VMT) methodology is not implemented by the City: [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)

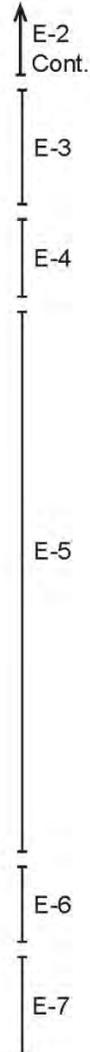
Within the last few days, there are many traffic issues that were discussed in the telephone conversations among yourself, the City engineer, traffic consultant, and Caltrans. The City acknowledged Caltrans' traffic concerns and is willing to consider the following new policies to the Covina Transit Oriented Mixed-Use Development Project.

- The City will work with Caltrans and other neighboring agencies to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps, in an effort to reduce disruption of traffic flow on State facilities and improve safety.
- The City will work with Caltrans and other neighboring agencies to identify cumulative significant traffic impact locations on State facilities and traffic improvements on I-210 and I-10 to alleviate traffic congestion.
- The City will consider a Transportation Impact Fee program with other agencies that would include the State transportation systems and facilities in the future. Caltrans would assist the City to overcome any challenge that the City may encounter.

As an on-going collaboration, the City and Caltrans will work together along with other agencies such as the City of West Covina, City of Azusa, and County of Los Angeles to resolve any cumulative significant traffic impacts with feasible improvements on the State facilities that the City may cause in the future. Caltrans and the City agree to periodically review the improvement list and propose any new improvement when available with other agencies.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.



*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

Mr. Brian K. Lee  
October 27, 2016  
Page 3

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

E-8

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2016-00149AL-DEIR.

E-9

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD / IGR Review

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

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## Response to Comment Letter E

### California Department of Transportation, District 7 October 27, 2016

- E-1** This comment summarizes the proposed project. No response is required.
- E-2** This comment summarizes a new methodology for analyzing traffic and transportation effects under CEQA. This new methodology was set forth in Senate Bill (SB) 743, which was signed into law in September 2013. SB 743 requires that the Governor’s Office of Planning and Research (OPR) amend the CEQA guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts. Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”

In January 2016, ORP released for public review a revised proposal for changes to the CEQA Guidelines that will change the way that transportation impacts are analyzed under CEQA. ORP collected public comments on this draft proposal for changes to the CEQA Guidelines through the end of February 2016. After the closure of the comment period, OPR is reviewing all written input and revising the proposal as appropriate. Next, the draft guidelines will be submitted to the Natural Resources Agency, which will then commence a formal rulemaking process. Next, the new guidelines will undergo review by the Office of Administrative Law. The link that is provided in this comment letter is for the revised proposal that was released by OPR in January 2016. This draft set of guidelines has not been officially adopted at the time of this writing. Furthermore, as stated in this set of guidelines, OPR recommends that the new procedures for evaluating traffic impacts remain optional for a two-year “opt-in” period. As stated in the draft guidelines, this opt-in period will enable those agencies that are ready to make the switch from LOS to vehicle miles traveled to do so but gives time to other agencies that have indicated that they need more time to become acquainted with the new procedures (OPR 2016a, 2016b).

The City of Covina has not adopted new traffic study guidelines in accordance with SB 743. The revised CEQA Guidelines are still under review and have not yet been adopted. As such, the City is not required to analyze the proposed project using vehicle miles traveled as a metric for assessing impacts to traffic and transportation. As such, the traffic analysis in the EIR and in Appendix H, Traffic Impact Study, is based on the City’s current traffic study guidelines, which use LOS and delay as a measure for significant transportation impacts under CEQA.

**E-3** This comment restates the number of daily trips and the number of AM and PM peak hour trips that would be generated by the proposed project, as originally provided in Section 3.16 and Appendix H of the Draft EIR. This comment also provides the project site's distance to the I-210 and I-10 freeways (1.5 miles) and states that the City should anticipate effects to state facilities that include the new trips generated by projects in nearby jurisdictions. The comment states that decision makers on this project should be aware of cumulative traffic issues on state facilities and should be prepared to mitigate cumulative traffic effects in coordination with other agencies that contribute to the impact.

The traffic study that was conducted for the proposed project, which is provided in Appendix H of the Draft EIR, includes a cumulative traffic analysis for year 2017 traffic conditions and year 2036 traffic conditions. The cumulative traffic scenario for 2017 was calculated using an ambient growth rate of 1% per year plus the number of trips attributable to planned projects, reasonably foreseeable projects, or projects that have been approved but are not yet built in the project area. As part of the traffic study, a review was conducted of planned, reasonably foreseeable, and approved but unbuilt projects. Based on this review, two cumulative projects were identified in the City that would generate measurable traffic in the traffic study area for the proposed project. To account for traffic growth in the region, the traffic analysis applied an ambient growth rate of one percent (1%) per year, which was higher than the projected growth rate of 0.5 percent as estimated in the Los Angeles County Metropolitan Transportation Authority's 2010 Congestion Management Program. The traffic analysis determined that the intersections with freeway ramps in 2017 with the proposed project would operate at acceptable LOS A, B, or C during the peak hours, which would not be approaching the intersection capacity at LOS F. Therefore, it is not anticipated that the project would create a significant impact in 2017.

The cumulative traffic scenario for 2036 was calculated using the projected growth factor provided in the Los Angeles County Metropolitan Transportation Authority's 2010 Congestion Management Program. For the West Covina subregion, which includes the City of Covina and surrounding cities and communities, the expected growth factor from 2016 to 2036 was approximately 8.1%. The traffic analysis determined that the intersections with freeway ramps in 2036 with proposed project traffic would operate at acceptable LOS A, B, or D during the peak hours, which would not be approaching the intersection capacity at LOS F. Therefore, it is not anticipated that the project would create a significant impact in 2036.

As shown in Section 3.16 of the Draft EIR and in Appendix H, the study intersections that were examined for potential impacts under the proposed project and under the

two cumulative scenarios (2017 and 2036) include Citrus Avenue at the I-210 eastbound ramps and Citrus Avenue at the I-10 westbound ramps. Under existing 2016 conditions, these intersections operate with acceptable LOS during the AM and PM peak hours. Under future 2017 traffic conditions, both with and without the proposed project, these intersections would continue to operate with acceptable LOS, at LOS A, B, or C during the peak hours. In fact, according to the Traffic Impact Analysis, the LOS of these intersections during AM and PM peak hours is anticipated to remain the same across all three conditions (i.e., existing conditions, future 2017 conditions without the project, and future 2017 conditions with the project). In future 2036 conditions without the project, the intersection operations at these ramps would remain generally the same as the existing and 2017 conditions, with the exception of Citrus Avenue at the I-210 eastbound ramps in the AM peak hour, which is anticipated to operate at slightly degraded conditions. However, the anticipated LOS is still considered acceptable under the City’s LOS thresholds, remaining at LOS A, B, C, or D during the peak hours. Future 2036 traffic conditions with the proposed project would cause slightly degraded conditions at the Citrus Avenue and I-10 westbound ramps. However, the anticipated LOS is still considered acceptable under the City’s LOS thresholds.

As described above and as further substantiated in Section 3.16 and Appendix H of the Draft EIR, the proposed project is not anticipated to create significant effects at the I-210 and I-10 ramps under the existing conditions with the proposed project, as well as under the cumulative growth scenarios for 2017 and 2036. As described above, the intersections with freeway ramps in 2017 and 2036 with proposed project traffic would operate at acceptable LOS A, B, C, or D during the peak hours, which would not be approaching the intersection capacity at LOS F. Therefore, it is not anticipated that the project would create a significant impact in 2017 and 2036. Furthermore, as stated in this comment, the City would be required to mitigate or contribute to mitigation for any significant traffic impacts that may be identified in association with future projects in the City. The City acknowledges that mitigation may require collaboration with other nearby agencies and jurisdictions whose projects may affect the same state facilities.

**E-4** This comment provides a link to Caltrans’ guide for the preparation of traffic impact studies for jurisdictions that do not use the new vehicles miles traveled methodology. Caltrans requests that the City refer to these guidelines for future projects. The City acknowledges receipt to the link to this Caltrans guide.

**E-5** This comment provides suggested policies that have been discussed by the City and Caltrans to address future cumulative traffic concerns on state facilities and freeway

on- and off-ramps that may be caused by future development projects within the City and within nearby jurisdictions. These policies are summarized below. The City's response to each of these recommended policies is provided beneath each policy.

*(1) The City will work with Caltrans and neighboring jurisdictions to evaluate access management needs and strategies to better manage traffic operations on arterial streets within close proximity of freeway on- and off-ramps, in an effort to reduce disruption of traffic flow on state facilities and to improve safety.*

As described in Response E-3, no significant impacts have been identified in association with the proposed project at the nearby ramps of the I-210 and I-10 that were examined for potential impacts in the traffic study. This environmental impact conclusion includes analysis of cumulative growth scenarios for 2017 and 2036. The intersections with freeway ramps in 2017 and 2036 with proposed project traffic would operate at acceptable LOS A, B, C, or D during the peak hours, which would not be approaching the intersection capacity at LOS F. Therefore, it is not anticipated that the project would create a significant impact in 2017 and 2036. However, the City acknowledges that future projects could potentially have an effect on freeway ramps and/or on the operation of arterial streets within close proximity to the ramps, subject to future evaluation during the CEQA process. In the event that significant impacts are identified for future projects that may occur in the City, the City would mitigate those impacts to the extent required. Such mitigation could potentially involve coordination with Caltrans and nearby jurisdictions, if required.

*(2) The City will work with Caltrans and other neighboring agencies to identify cumulative significant traffic impact locations on state facilities and traffic improvements on I-210 and I-10 to alleviate traffic congestion.*

As discussed in Section 3.16 and Appendix H of the Draft EIR, the proposed project would have a less than significant impact on intersection operations, including the operation of intersections at nearby freeway ramps (i.e., the I-210 eastbound ramps at Citrus Avenue and the I-10 westbound ramps at Citrus Avenue). Furthermore, as stated in Section 3.16 of the Draft EIR, the proposed project would have a less than significant impact on Los Angeles County Congestion Management Plan (CMP) facilities. CMP facilities in the project area consist of the I-10, the I-210, and Azusa Avenue. (The I-210 is located approximately 1.5 miles north of the project site, the I-10 is located approximately 1.5 miles south of the project site, and Azusa Avenue is located approximately 1 mile west of the project site.) The proposed project was determined to have a less than significant impact on CMP intersections and roadways as it does not meet the criteria for impact analysis under the CMP. However, the City

acknowledges that future projects could potentially have an effect on freeway ramps and/or on the operation of arterial streets within close proximity to the ramps, subject to future evaluation during the CEQA process. In the event that significant impacts are identified for future projects that may occur in the City, the City would mitigate those impacts to the extent required. Such mitigation could potentially involve coordination with Caltrans and nearby jurisdictions, if required.

*(3) The City will consider a Transportation Impact Fee program with other agencies that would include the state transportation systems and facilities in the future. Caltrans would assist the City to overcome any challenge that the City may encounter.*

As discussed in Section 3.16 and Appendix H of the Draft EIR, the proposed project would not result in significant transportation and traffic impacts requiring mitigation. As such, mitigation such as a Transportation Impact Fee program would not be required for the proposed project under CEQA. However, the City acknowledges that future projects could potentially have an effect on state transportation systems and facilities, subject to future evaluation during the CEQA process. In the event that significant impacts are identified for future projects that may occur in the City, the City would mitigate those impacts to the extent required. Such mitigation could potentially involve a Transportation Impact Fee program.

*(4) As an ongoing collaboration, the City and Caltrans will work together along with other agencies such as the City of West Covina, City of Azusa, and County of Los Angeles, to resolve any cumulative significant traffic impacts with feasible improvements on the state facilities that the City may cause in the future. Caltrans and the City agree to periodically review that improvement list and propose any new improvement when available with other agencies.*

As discussed in Section 3.16 and Appendix H of the Draft EIR, the proposed project would not result in significant transportation and traffic impacts requiring mitigation. As such, mitigation such as improvements to state facilities would not be required for the proposed project under CEQA. However, the City acknowledges that future projects could potentially have an effect on state transportation systems and facilities, subject to future evaluation during the CEQA process. In the event that significant impacts are identified for future projects that may occur in the City, the City would mitigate those impacts to the extent required. Such mitigation could potentially involve improvements to state facilities conducted in collaboration with nearby jurisdictions such as the City of West Covina, City of Azusa, and County of Los Angeles.

**E-6** This comment states that any work performed within a state right-of-way would require an Encroachment Permit from Caltrans and that modifications to state facilities must meet all mandatory design standards and specifications.

The proposed project would not involve work within a state right-of-way, nor would it involve modifications to state facilities. The proposed project site is located approximately 1.5 miles away from the nearest state facilities (I-210 and I-10).

**E-7** This comment states that projects should discharge clean runoff water and that stormwater runoff is not allowed to occur onto state highway facilities without a stormwater management plan.

Impacts to hydrology and water quality resulting from the proposed project are addressed in Section 3.9 of the Draft EIR. As stated in this section, the project applicants and/or their contractors would be required to develop and implement a Storm Water Pollution Prevention Plan during construction on the project site, as required under the General Construction Activity Stormwater Permit that is issued by the State Water Resources Board. Implementation of the Storm Water Pollution Prevention Plan would ensure that stormwater runoff from the site during construction would protect water quality and minimize runoff to the extent required. The proposed project is also subject to Section 8.50.120 of the City's Municipal Code, which would require the project to prepare and implement a Standard Urban Stormwater Mitigation Plan (SUSMP) / Low Impact Development (LID) Plan. Implementation of the SUSMP/LID Plan would ensure compliance with the applicable Municipal Separate Storm Sewer System (MS4) permit, which is Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175. The overarching performance criterion associated with this permit is that applicable projects are required to retain on site 100% of the Stormwater Quality Design Volume. As such, implementation of the required SUSMP/LID Plan at the project site would reduce runoff volumes and water pollutants from the project site. Furthermore, the proposed project is located 1.5 miles from the nearest state highway facilities (I-210 and I-10). Any stormwater that is discharged from the project site is not anticipated to flow onto a state highway facility due to the distance between the project site and the nearest state highway facilities and the intervening development and stormwater infrastructure that lies between the project site and these facilities.

**E-8** This comment states that transportation of heavy construction equipment and/or materials requiring the use of oversized transport vehicles on state highways require a transportation permit from Caltrans. This comment also notes that large size truck trips are recommended to occur during off-peak commute periods.

Any oversized transport vehicles used during construction would be subject to applicable Caltrans requirements. Any required permits would be obtained by the construction contractor or equipment owners who are responsible for transporting the equipment. The recommendation for large-sized truck trips to occur during off-peak commute periods will be included in the Final EIR for review and consideration by decision makers.

- E-9** This comment provides contact information for Caltrans. In accordance with the requirements of CEQA Guidelines Section 15088(b), the City will provide a written response to Caltrans comments on the Draft EIR to Caltrans at least 10 days prior to certifying the Final EIR. In the event that the City has any further questions for Caltrans, the contact information provided in this comment will be used.

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Comment Letter F

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October 27, 2016

Brian K. Lee, AICP  
Director of Community Development  
City of Covina  
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Covina, California 91723

VIA EMAIL TO:  
*blee@covinaca.gov*

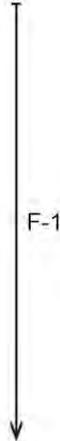
Re: *Covina Transit Oriented Mixed-Use Development Project (SCH No. 2016051053)*

Dear Mr. Lee:

This letter is to serve you with comments on behalf of the SoCal Environmental Justice Alliance (“SEJA”) regarding the Covina Transit Oriented Mixed-Use Development Project (SCH No. 2016051053) (the “Project”) and its Draft Environmental Impact Report (the “DEIR”).

Background

The Project would involve a General Plan Amendment (GPA) to develop a mixed-use residential, transit-oriented development (TOD) project. The Project would consist of three primary components: (1) a Transit Center and Park & Ride facility; (2) the Covina Innovation, Technology, and Event Center (iTEC) - an event center and professional office/business incubator space; and (3) residential townhome units. The Project Site is located in the City of Covina. The 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. The Project Site encompasses approximately 10.66 acres on three parcels (Assessor’s Parcel Numbers 8406-019-019, 8406-019-020, and 8406-019-017).



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SEJA believes the DEIR is flawed. The City of Covina's (the "City's") environmental review process has failed to ensure environmental, social, and economic justice for the City's residents. Therefore, we believe you should redraft and recirculate the DEIR.

F-1  
Cont.

Air Quality

The construction of the Project is expected to take 57 months. The DEIR claims that the construction will happen in phases and uses phased modeling to analyze air quality impacts. This is improper because the Project does not actually require the developer to adopt the phased construction plan. Even if the phased plan were adopted, NOx emissions still exceed the SCAQMD threshold.

F-2

Further, the DEIR provides no analysis of impact from potential overlap of construction phases or mitigation if this were to occur. The DEIR fails to exclude the possibility that these construction phases could occur simultaneously and result in even more serious pollution. The DEIR also fails to consider that construction may occur faster, which would result in significantly greater impacts. Project specific modeling must be prepared to evaluate the "worst case scenario." The DEIR also does not specify the number of hours per day that construction will occur, or require that construction be completed over a certain number of days.

The tables presented in the air quality analysis (Air Quality Impact 3.3.4(b)) purport to include two one-way trips per worker in each proposed construction phase. However, as shown below, the DEIR fails to specify the employee count and underestimates the trip count for some phases. Thus, the DEIR fails to provide sufficient information to make the meaningful disclosures required by CEQA.

Land Development Phase: Trenching  
Project Description employee count: not given  
Air Quality trip count: 10 trips

Land Development Phase: Paving  
Project Description employee count: not given  
Air Quality trip count: 16 trips

Residential Townhome Phase: Trenching  
Project Description employee count: 4  
Air Quality trip count: 4 trips  
Trip count underestimated by 50%

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Transit Center Park and Ride Phase: Trenching  
Project Description employee count: 4  
Air Quality trip count: 6 trips  
Trip count underestimated by 33%

Transit Center Park and Ride Phase: Construction  
Project Description employee count: not given  
Air Quality trip count: 50 trips

Transit Center Park and Ride Phase: Paving  
Project Description employee count: 10  
Air Quality trip count: 10 trips  
Trip count underestimated by 50%

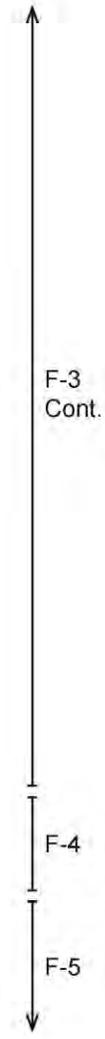
iTec Phase: Site Preparation  
Project Description employee count: 20  
Air Quality trip count: 10 trips  
Trip count underestimated by 50%

iTec Phase: Grading  
Project Description employee count: not given  
Air Quality trip count: 20 trips

iTec Phase: Construction  
Project Description employee count: not given  
Air Quality trip count: 28 trips

iTec Phase: Architectural Coating  
Project Description employee count: not given  
Air Quality trip count: 6 trips

In Air Quality Impact 3.3.4(d), the DEIR states that “[o]ff-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis.” This is improper because the DEIR fails to provide any reason for excluding these major sources of emissions from the LST analysis. Further, the DEIR claims that there is no significant impact on sensitive receptors even though there are sensitive receptors located immediately adjacent to the Project Site. The DEIR does not provide sufficient information about exactly which sensitive receptors were analyzed for impact and the locations where measurements were taken for the air quality impact analysis. The analysis must be revised to ensure that



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the measurements are taken from the property line of the Project Site closest to the sensitive receptors.

In Air Quality Impact 3.3.4(e), the DEIR claims that “[o]dors from these sources would be localized and generally confined to the project site. Potential project-generated construction odors would be temporary as construction would occur over four years.” “Residences located within the project vicinity are not anticipated to be affected by construction odors.” The DEIR fails to provide any evidence or analysis to support these conclusory statements, including that construction odors from a 4.5-year project would be merely “temporary.”

The DEIR also claims that “the release of potential odor-causing compounds would tend to be during the workday, when many residents would not be home.” This generalization is not supported by any evidence. In fact, the Project is located immediately north of the Village Green Senior Apartments, which are sensitive receptors that house retired senior citizens who are likely to stay home during the majority of the day.

In its analysis on operational odors, the DEIR claims that “the bus traffic resulting from the operation of the Transit Center and Park & Ride Facility would not cause odors typically associated with large commercial vehicles because the buses would be fueled by natural gas instead of diesel.” This claim is misleading when the Project does not require that only natural-gas-fueled buses may be used on the Project Site. It is very likely that the Project Site will be used by diesel-fueled buses from existing fleets.

Greenhouse Gas Emissions

In GHG Impact 3.7.4(A), the DEIR improperly amortizes construction emissions over 30 years. This is inconsistent with the State’s GHG reduction goals as set forth in AB 32, Executive Order S-3-05 and Executive Order B-30-15.



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Noise

The noise impact analysis states that construction will be completed over 37 months, even though the air quality impact analysis states that the construction will take 57 months. The noise impact analysis is inaccurate and must be redone and recirculated.

|  
F-10  
|

Sincerely,



Gary Ho  
BLUM | COLLINS LLP

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## Response to Comment Letter F

### SoCal Environmental Justice Alliance October 27, 2016

**F-1** This comment is introductory in nature. It summarizes the proposed project and states that the SoCal Environmental Justice Alliance (SEJA) believes that the Draft EIR is flawed and should be recirculated because the City's environmental review process failed to ensure environmental, social, and economic justice for the City's residents.

In accordance with Article 7 of the CEQA Guidelines, the City prepared an EIR for the proposed project for the purpose of informing governmental decision makers and the public about the potential significant environmental effects of the proposed project, identifying the ways that environmental damage can be avoided or significantly reduced, and preventing significant and avoidable damage to the environment. The Draft EIR adequately analyzes the environmental effects of the proposed project, and the conclusions in the Draft EIR are supported by substantial evidence in the record. None of the requirements for recirculation listed in CEQA Guidelines Section 15088.5 have been triggered, and recirculation of the Draft EIR is not required. The specific issues identified by SEJA are addressed below. As substantiated in the responses below, none of the issues raised by SEJA demonstrate that the EIR is inadequate or flawed pursuant to CEQA. Note that social and economic justice issues need not be considered in an EIR (CEQA Guidelines Section 15064(e)) unless adverse physical impacts are likely to occur, which is not the case here. Rather, the focus of the analysis must be on physical changes to the environment (CEQA Guidelines Section 15131). The responses below prepared by the City summarize and discuss the specific concerns identified by the commenter and describe why these concerns do not demonstrate that the EIR is flawed or that recirculation is required.

**F-2** This comment states that the phasing of construction modeling is improper because it doesn't require the developer to adopt the phased construction outlined in the analysis, nor does it require that construction be completed over a certain number of days. Additionally, the comment states the air quality analysis does not account for the potential for overlap between the major construction components or for the potential for construction to occur faster. The comment notes that overlapping phases and/or a shortened construction duration could result in greater impacts than those identified in the EIR. The comment also states that the Draft EIR does not identify the number of hours per day that construction will occur.

The number of hours of construction per day were included in the Air Quality modeling and provided in Appendix B. The analysis generally assumes 8 hours of construction per day for most equipment pieces. The construction schedule was provided by the project applicants, and the air quality analysis is based on this schedule. The construction schedule is described both in Chapter 2.0, Project Description, and in Section 3.3.4, Air Quality, of the Draft EIR. The purpose of mitigation measures and conditions of approval are to reduce the environmental impacts of a proposed project, not to define the parameters of the proposed project—that is the role of the project description.

The construction schedule description includes the degree of overlap of the major construction components. Air quality modeling for each major component was conducted separately due to the computational limits of the emissions model. More specifically, because of the complexity and phasing of the construction of the project it was necessary to separate out each major component of the project in order for the emissions model to function. However, the emissions of overlapping construction phases were addressed cumulatively in Table 3.3-10 Estimated Maximum Daily Construction Emissions on page 3.3-27 of the Draft EIR. This table takes the highest emissions of each major construction component within a given year and compares them cumulatively to the SCAQMD's thresholds. The analysis in this table shows a worst case scenario for each year of construction. Further overlap between each construction component is not anticipated; there is no basis for such an assumption in the information provided by the applicants, and any analysis over overlapping construction schedules would be based solely on speculation, which CEQA discourages (CEQA Guidelines § 15145). Additionally, further overlap is not considered feasible due to the nature of construction phasing and the construction schedules outlined by the applicants. The land development phase of construction, which includes demolition and grading of the entire site, would need to be completed prior to the construction the residences, Transit Center and Park & Ride Facility, or the iTEC Center as it would be impossible to construct the proposed project with the existing structures still standing or the proper foundation graded. Following completion of the land development phase, the Transit Center and Park & Ride Facility and the residences would be built simultaneously, which is accounted for in the analysis.

- F-3** This comment states that the Draft EIR fails to specify the employee count and underestimates the trip counts for some construction phases. The estimation of worker counts are default values in air quality emissions model given the size of the project and other factors regarding construction, such as equipment and phasing. These estimates were directly used in the air quality analysis, as shown in Tables 3.3-6, 3.3-

7, 3.3-8, and 3.3-9. The worker counts that are reported in Chapter 2.0 of the Draft EIR relied on those used in the air quality analysis. As such, the discrepancies identified in this comment represent an administrative error in Chapter 2.0, rather than an error or oversight in the air quality impact analysis. This discrepancy has been resolved in Chapter 3.0 of this Final EIR. Because this revision simply corrects a clerical error and does not affect any of the analysis in the Draft EIR, no recirculation is required.

- F-4** This comment states it is improper to exclude the resulting emissions from off-site emission sources such as vendor trucks, haul trucks and worker vehicle truck trips from the localized significance threshold (LST) analysis. The comment further states that the Draft EIR fails to provide reasons for excluding off-site emissions from the LST analysis.

The South Coast Air Quality Management District (SCAQMD) has provided guidance that “LSTs only apply to emissions at a fixed location ... LSTs are not applicable to mobile sources traveling over the roadways.” As stated in the SCAQMD’s *Final Localized Significance Threshold Methodology*, “off-site mobile emissions from the project should not be included in the emissions compared to the LSTs” (SCAQMD 2009). Reasons for excluding off-site emissions are described in Section 3.3.4 of the Draft EIR. As such, the EIR does in fact provide reasons for excluding off-site emissions from the LST analysis, and exclusion of off-site emissions is proper under applicable standards provided by the agency (SCAQMD) with expertise in this area.

- F-5** This comment states that the Draft EIR does not provide sufficient information about exactly which sensitive receptors were analyzed and that the analysis must be revised to ensure that measurements are taken from the property line of the project site closest to the sensitive receptors.

As stated on page 3.3-30 of the Draft EIR, the nearest off-site sensitive receptors consist of residences located approximately 30 feet north of the project site boundary. The measurement of 30 feet represents the distance from the northernmost property line of the project site to the southernmost sensitive receptor. Therefore, the impact discussion does in fact denote which sensitive receptors were analyzed. Additionally, the SCAQMD’s LST methodology explicitly states, “It is possible that a project may have receptors closer than 25 meters (82 feet). Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” As such, LSTs for receptors at 25 meters (82 feet) are used in the analysis, per SCAQMD’s guidelines. As such, the LST analysis relies on thresholds that can be

used for any sensitive receptors located 82 feet or closer to the property line of the project site. The analysis utilized the most stringent distance available in terms of impacts. As such, even if a sensitive receptor were located 0 feet from the property lines of the project site, the outcome of this analysis would not change.

- F-6** This comment states that the Draft EIR fails to provide any evidence to support that construction impacts related to odors would be temporary, localized, and generally confined to the project site. This comment also states that the Draft EIR fails to provide evidence or analysis to support the statement that “residences located within the project vicinity are not anticipated to be affected by construction odors.” The commenter purports that the statements made in the Draft EIR relative to odors are conclusory in nature.

The Draft EIR examines construction odors for their potential to affect a substantial number of people. Regarding construction odors, from the context of the project as a whole, which is anticipated to have a 30 year operational lifespan, 4 years of construction would be considered temporary or short-term in nature. The anticipated construction duration provides substantial evidence that construction-related odors would be temporary in nature. The analysis in the Draft EIR also provides a description of the types of odors that are anticipated (unburned hydrocarbons from tailpipes of construction equipment). These types of odors are not particularly objectionable or acute, nor are they particularly usual or noticeable in the context of an urbanized environment. Further, the nature and source of the anticipated odors provides evidence for the statement that odors would be localized and generally confined to the project site. As such, the statements provided in the Draft EIR relative to construction odors are not conclusory in nature, and in fact are supported by substantial evidence.

- F-7** This comment states that the DEIR doesn’t support the following statement with evidence: “The release of potential odor-causing compounds would tend to be during the workday, when many residents would not be home.”

The statement is used as a “furthermore” statement. The less than significant determination for odors is based on the temporary nature and quick dissipation of odors related to construction. As discussed in the Draft EIR, the project would have to comply with the SCAQMD nuisance rules. However, if nearby residents (including those at the Village Green Senior Apartments) have concerns about potential odor impacts, they can contact the City to ensure the contractor is complying with applicable regulations. The SCAQMD can also contact the construction contractor

and conduct a site visit to determine whether the construction contractor is complying with applicable regulations.

**F-8** The comment states the Draft EIR is misleading because the project does not require that only natural-gas fueled buses may be used and that is very likely that diesel-fueled buses from existing fleets will be used. The proposed Transit Center and Park & Ride would be used only by Foothill Transit buses. In 2013, Foothill Transit retired its last diesel vehicle. Foothill Transit’s bus fleet is composed entirely of compressed natural gas and all-electric vehicles. Foothill Transit has recently initiated an effort to convert its entire fleet to electric vehicles by 2030 (Foothill Transit 2016). Foothill Transit has not operated a diesel bus for several years and is in fact moving away from fossil fuel– burning vehicles, as displayed by its recent efforts to convert its fleet to all electric vehicles over the next decade. Therefore, the use of diesel buses on the project site would not occur and, therefore, it is unnecessary to analyze such a scenario.

**F-9** This comment states that amortizing greenhouse gas emissions over 30 years is inconsistent with state-wide GHG reduction goals.

The methodology used in the EIR analysis is based off of an SCAQMD greenhouse gas (GHG) guidance document which states “GHG emission impacts will include both construction and operation activities” (SCAQMD 2008). Because impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. The guidance document goes on to say “construction emissions should be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.” The SCAQMD guidance document was created in part with the purpose of providing methodology to use during CEQA analysis. Additionally, it is common practice across the State to amortize construction GHG emissions to analyze project GHG emissions. The County of San Diego within the San Diego Air Pollution Control District recommends amortization of construction emissions over a 20-year period. The City of San Diego, similar to the SCAQMD, utilizes a 30-year amortization rate. The San Luis Obispo County Air pollution Control District recommends a 50-year amortization period for residential projects and a 25-year amortization period for commercial (non-residential projects) based on the anticipated project life.

As discussed on page 3.7-31 of the Draft EIR, with regards to consistency with Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050) and Executive Order B-30-15 (goal of reducing GHG emissions to 40%

below 1990 levels by 2030), there are no established protocols or thresholds of significance for future year analysis. However, CARB forecasts that compliance with the current Scoping Plan puts the State on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014). As identified in Table 3.7-5 of the Draft EIR, the proposed project is consistent with the GHG emission reduction measures in the Scoping Plan and would not conflict with the State’s trajectory toward future GHG reductions. In addition, since the specific path to compliance for the State with regards to long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. With respect to future GHG targets under the Executive Orders, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet Executive Order S-3-05’s 80% reduction target in 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the State on its trajectory toward meeting these future GHG targets.

In short, AB 32 and the executive orders do not establish any protocols for assessing GHG emissions that would contradict the methodology used in the Draft EIR’s analysis. As such, the GHG analysis provided in the Draft EIR is consistent with applicable guidance and does not conflict with the State’s GHG reduction goals.

**F-10** This comment identifies an inconsistency in the construction duration described in the Draft EIR. Section 3.12, Noise, in the Draft EIR states that the proposed project construction would last for approximately 37 months. Elsewhere in the Draft EIR, a duration of approximately 57 months is referenced. The comment states that this discrepancy renders the noise analysis in the Draft EIR inaccurate and that the noise analysis must be revised and recirculated.

On page 3.12-15 of the Draft EIR, under the “Construction Noise (Short-Term Impacts) subheading, the construction scenario is characterized. Construction is described as occurring from February 2017 through 2021. This duration is consistent with the description of the construction scenario provided in the air quality analysis (see page 3.3-22 of the Draft EIR), as well as the construction scenario provided in the project description (see pages 2-9 and 2-10 of the Draft EIR). The specific reference to “37 months” provided in the Section 3.12 is an administrative error. The number of construction months is referenced in Section 3.12 for informational purposes only and has no bearing on the noise analysis or the conclusions of the noise analysis, as substantiated in the paragraph below.

Maximum noise levels at the nearest noise-sensitive land uses were calculated in Section 3.12 using a standard noise model. Inputs for this model are as follows: receiver/land use types, the equipment type and number of each, the duty cycle for each piece of equipment (i.e., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. Note that this model does not take into account the overall duration of construction. The time metric used in the model is the duration that a particular piece of equipment operates on a daily basis (not the overall duration that the equipment will operate for the entire construction period). Furthermore, the duty cycle for each piece of equipment is established using model defaults rather than project-specific inputs. (These defaults were derived from an extensive study of typical construction activity patterns.) As such, whether the proposed project would take 57 months to construct or 37 months to construct has no effect on the outcome of the construction noise modeling that was conducted. In addition, construction will occur over different areas of the project site so noise impacts will not be heard in the same areas across the entire duration of construction, different equipment will be used at different times depending on the phase of construction, and construction will not occur on all days of the week. The conclusion of the construction noise analysis on page 3.12-18 of the Draft EIR notes that construction would be short term. However, the impact determination is not tied to the construction duration. Rather, the impact determination is tied to the amount of noise that construction may produce on a given day and whether or not the noise would exceed the City's standards on any given day. Because the noise modeling determined that construction noise at the nearest sensitive receptors could exceed City standards, the impact was determined to be potentially significant. As explained above, the calculations for the amount of noise produced do not consider the overall duration of construction. As such, changing the duration of construction would not alter this impact conclusion, nor would it alter the severity of the noise produced on any given day of construction. Mitigation measures MM-NOI-1 and MM-NOI-2 were provided to reduce construction noise to below a level of significance. The implementation of such measures and the effectiveness of such measures would not be affected by the duration of construction. For these reasons, the discrepancy in construction duration that is identified by the commenter has no bearing on the noise impact analysis or the environmental determinations provided in this analysis.

For the reasons described above and pursuant to CEQA Guidelines Section 15088.5, recirculation is not required due to the discrepancy in the number of construction months identified in this comment. As stated in CEQA Guidelines Section 15088.5, recirculation is required when significant new information is added to the EIR. This comment does not present "significant new information" or result in significant new

information being added to the EIR. Significant new information requiring recirculation is defined in CEQA Guidelines Section 15088.5(a) as a disclosure showing that a new significant environmental impact would result, a substantial increase in the severity of an environmental impact would result (unless mitigation measures are adopted that reduce the impact to a level of insignificance), a feasible project alternative or mitigation measure considerably different from the others that were previously analyzed would clearly lessen the environmental impacts, or the Draft EIR is so fundamentally flawed and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. As substantiated in the paragraph above, a slight discrepancy in the number of months of project construction in the noise analysis does not substantially increase the severity of any impacts, does not reveal a new significant impact, does not identify a new project alternative or mitigation measure, and does not render the Draft EIR fundamentally flawed and basically inadequate. As such, recirculation is not required. Rather, this comment simply shows a minor administrative error in an element of the noise analysis that was provided for informational purposes only. This administrative error has been corrected in Chapter 3.0 of this Final EIR.

Comment Letter G



October 25, 2016  
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Charles Hodapp, Chair  
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626.967.4191 fax 626.966.9660  
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RE: Support for the Proposed Covina Forward Development

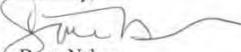
Dear Chairman Hodapp,

On behalf of the Covina Chamber of Commerce, I am pleased to convey our support of the Covina Forward project. As the voice of the Covina business community, the Chamber is always looking for new ways to promote business and provide resources to enhance our local economy.

The Covina Forward project will help position Covina to be a regional destination and will positively impact our local economy. This project will not only improve a visibly prominent location in Covina, but it will also provide services to local residents, complement existing businesses and create new retail and commercial opportunities. It will stimulate local businesses by bringing more visitors and potential patrons to the Citrus corridor, as well as serving the public with a regional transportation center. All of these aspects are positive elements that will enable Covina to be a more desirable place for people to visit and conduct business.

In addition to the residential and transit opportunities this project will provide, we are especially excited about the innovation and technology center included within this development. It will encourage small businesses and entrepreneurs to foster new ideas and grow our local economy.

We are excited that this project will help Covina become a regional destination and a potential leader in innovation.

Sincerely,  
  
Dawn Nelson  
President/CEO

G-1

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## **Response to Comment Letter G**

**Covina Chamber of Commerce  
October 25, 2016**

- G-1** This comment expresses support for the proposed project. No response is required. This comment will be included in the Final EIR for review and consideration by decision makers.

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Comment Letter H



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

October 28, 2016

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

Subject: Covina Transit Oriented Mixed-Use Development Project  
SCH#: 2016051053

Dear Brian K. Lee:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 27, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

H-1

Document Details Report  
State Clearinghouse Data Base

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*Date Received* 09/13/2016    *Start of Review* 09/13/2016    *End of Review* 10/27/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN, Jr., Governor

**DEPARTMENT OF TRANSPORTATION**  
 DISTRICT 7—OFFICE OF TRANSPORTATION PLANNING  
 100 S. MAIN STREET, MS 16  
 LOS ANGELES, CA 90012  
 PHONE: (213) 897-8391  
 FAX: (213) 897-1337  
 www.dot.ca.gov



*Serious drought.  
 Help save water!*

Governor's Office of Planning &amp; Research

October 27, 2016

OCT 27 2016

STATE CLEARINGHOUSE

Mr. Brian K. Lee  
 City of Covina  
 125 East College Street  
 Covina, CA 91723

clear  
 10/27/16

RE: Covina Transit-Oriented Mixed-Use  
 Development Project  
 Vic. LA-10/PM 37.49, LA-210/PM R40.59  
 SCH # 2016051053  
 Ref. IGR/CEQA No. 160527AL-NOP  
 GTS # LA-2016-00149AL-DEIR

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 (120 units).

Senate Bill 743 (SB 743) (2013) mandated that CEQA review of transportation impacts of proposed development be modified by eliminating consideration of delay- and capacity- based metrics such as Level of Service (LOS) and instead focusing analysis on another metric of impact. The Governor's Office of Planning and Research (OPR) is currently updating its CEQA Guidelines to implement SB 743 ([https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php)) and is proposing that vehicle miles traveled be the primary metric used in identifying transportation impacts.

OPR has released a separate "Technical Advisory" outlining recommended techniques for measuring impacts with this new metric, which applies statewide. General Plan Guidelines ([https://www.opr.ca.gov/s\\_generalplanguidelines.php](https://www.opr.ca.gov/s_generalplanguidelines.php)) are also concurrently being updated to align with state policy, including SB 743.

The City should refer the project's traffic consultant to OPR's website, guidelines on evaluating transportation impacts in CEQA:

[https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf)

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. During the transition, Caltrans will assist the City in preparing future traffic studies and will provide comment accordingly if LOS is still

*"Provide a safe, sustainable, integrated and efficient transportation system  
 to enhance California's economy and livability"*

Mr. Brian K. Lee  
 October 27, 2016  
 Page 2

in use. After reviewing the Traffic Impact Study that was submitted, Caltrans has the following comments:

The project will generate a net 2,072 daily trips and 313/275 AM/PM peak hour trips. The project site is about 1.5 miles away from I-210 and I-10. As a result, the City should anticipate many trips including other agencies' cumulative project trips utilizing the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future with other agencies.

For future projects, please use the following link in reference to Caltrans guide when a traffic impact study is needed, if Vehicle Miles Traveled (VMT) methodology is not implemented by the City: [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)

Within the last few days, there are many traffic issues that were discussed in the telephone conversations among yourself, the City engineer, traffic consultant, and Caltrans. The City acknowledged Caltrans' traffic concerns and is willing to consider the following new policies to the Covina Transit Oriented Mixed-Use Development Project.

- The City will work with Caltrans and other neighboring agencies to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps, in an effort to reduce disruption of traffic flow on State facilities and improve safety.
- The City will work with Caltrans and other neighboring agencies to identify cumulative significant traffic impact locations on State facilities and traffic improvements on I-210 and I-10 to alleviate traffic congestion.
- The City will consider a Transportation Impact Fee program with other agencies that would include the State transportation systems and facilities in the future. Caltrans would assist the City to overcome any challenge that the City may encounter.

As an on-going collaboration, the City and Caltrans will work together along with other agencies such as the City of West Covina, City of Azusa, and County of Los Angeles to resolve any cumulative significant traffic impacts with feasible improvements on the State facilities that the City may cause in the future. Caltrans and the City agree to periodically review the improvement list and propose any new improvement when available with other agencies.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

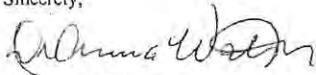
*"Provide a safe, sustainable, integrated and efficient transportation system  
 to enhance California's economy and livability"*

Mr. Brian K. Lee  
October 27, 2016  
Page 3

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2016-00149AL-DEIR.

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD / IGR Review

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

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## Response to Comment Letter H

**Governor’s Office of Planning and Research – State Clearinghouse Planning Unit  
October 28, 2016**

**H-1** This letter from the State Clearinghouse confirms that the City has complied with the State Clearinghouse review requirements for draft EIRs, pursuant to CEQA. A letter from the California Department of Transportation is attached. This letter is included in this chapter of the Final EIR as Letter E, and the comments contained in this letter are addressed under “Response to Comment Letter E.”

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Comment Letter I



District Superintendent  
Richard M. Sheehan, Ed.D.

Board of Education  
Sonia Frasquillo  
Charles M. Kemp

October 28, 2016

Covina Planning Commission  
Charles Hodapp, Chair  
125 E. College St.  
Covina, CA 91723



Sue L. Maulucci  
Darrell A. Myrick  
Richard M. White

RE: Support for the Proposed Covina Forward Development

Dear Chairman Hodapp,

On behalf of Covina-Valley Unified School District (C-VUSD), I am writing to express our support for the proposed Covina Forward project. Our district highly values the importance of education and innovation, and to that end C-VUSD is looking forward to this exciting new project.

The Covina Forward project, as proposed, will help position Covina to become a regional destination and will positively impact our local and regional economy. This project will not only dramatically enhance a visibly prominent location in Covina, it will also provide services to residents, complement existing retail and commercial entities, and create new business opportunities.

In addition to the transportation opportunities this project will provide, we are especially excited about the innovation and technology facility included within this development. At C-VUSD, we constantly strive to provide our students and faculty the best resources and highest quality environment in which to learn. An innovation and technology facility would most certainly provide our school district with a chance to partner with local businesses and entrepreneurs to enhance Covina's economy and give students a platform to connect with the business community. It would also allow them to be on the cutting edge of new business models and trends as these students progress through their education journey.

We are excited that this project will help Covina become a regional destination and a potential leader in innovation.

Sincerely,

Richard M. Sheehan, Ed.D.  
Superintendent of Schools

519 E. Badillo Street • Covina, California 91723  
626.974.7000 • FAX 626.974.7032  
www.c-vusd.org

I-1

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## **Response to Comment Letter I**

**Covina-Valley Unified School District**

**October 28, 2016**

- I-1** This comment expresses support for the proposed project. No response is required. This comment will be included in the Final EIR for review and consideration by decision makers.

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## References

- CARB. 2014. *First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006*. May 2014. Accessed August 2014. [http://www.arb.ca.gov/cc/scopingplan/2013\\_update/first\\_update\\_climate\\_change\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf).
- Foothill Transit. 2016. “History” and “Foothill Transit Announces All Electric Bus Fleet by 2030.” Webpage. Accessed November 4, 2016.
- Office of Planning and Research (OPR). 2016a. *Revised Proposal on Updated to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA – Implementing Senate Bill 743 (Steinberg, 2013)*. January 20, 2016. Accessed November 1, 2016. [https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf).
- Office of Planning and Research (OPR). 2016b. “Updating the Analysis of Transportation Impacts Under CEQA.” Webpage. Accessed November 1, 2016. [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php).
- SCAQMD (South Coast Air Quality Management District). 2008. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October 2008.
- SCAQMD (South Coast Air Quality Management District). 2009. Localized Significance Thresholds Appendix C – Mass Rate LST Look-up Tables. Table C-1. Accessed May 24, 2016: <http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-lookuptables.pdf?sfvrsn=2>. Revised October 21, 2009.

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## CHAPTER 3 ERRATA

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The written comments received by the City during the public review period for the September 2016 Draft EIR contain several revisions to information in the EIR, specifically with regards to transit services. The City wishes to make these revisions by way of an errata. This errata merely clarifies and corrects minor facts and does not constitute “substantial revisions” requiring recirculation of the September 2016 Draft EIR, as set forth in CEQA Guidelines, Section 15073.5. The revisions are shown in Table 1 and are categorized by page number and section number. Text from the September 2016 Draft EIR that has been removed is shown in strikethrough (i.e., ~~strikethrough~~), and text that has been added as part of the Final EIR is shown as underlined (i.e., underline). Revisions are shown with surrounding sentences for context.

**Table 3-1  
Errata**

Draft EIR Page Number	Section	Clarification/Revision
ES-24	ES.6	<p>g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</p> <p>h. Would the project place <del>housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</del> within a 100-year flood hazard area structures which would impede or redirect flood flows?</p>
2-9	2.5.7	Construction of the overall proposed project is anticipated to take approximately 57 months. During construction activities, construction equipment and materials would be staged on-site so as not to obstruct access to surrounding streets. The entire 10.66-acre site would be graded and all existing structures would be demolished prior to commencement of vertical construction. Construction of the proposed project would include site preparation, grading, installation of public and private utilities, vertical construction; application of architectural coatings, paving of surface parking areas, public improvements, and landscaping (including any required tree removal). Details regarding the construction of each individual project component are provided below. The number of construction worker trips required per phase are characterized in Tables 3.3-6, 3.3-7, 3.3-8, and 3.3-9 of Section 3.3, Air Quality. The number of trips shown in these tables are one-way trips, and it is assumed that workers could not carpool. As such, the total number of workers per phase is equivalent to one-half the number of work vehicle trips.
2-9	2.5.7	The structures to be demolished include the 98,880-square foot K-mart building and a Single 2,186-square foot private school structure. The demolition would take place from February 2017 to March 2017 <del>and require a crew of eight workers.</del>
2-9	2.5.7	The second phase would entail a rough grade of the entire site, which would take 1.5 months <del>and necessitate a crew of nine workers.</del>
2-10	2.5.7.1	The first phase of construction for the Transit Center would include the installation and connection of underground utilities and related trenching activities, which would take approximately two months <del>and require a crew of four workers.</del>

**Table 3-1  
Errata**

Draft EIR Page Number	Section	Clarification/Revision
2-10	2.5.7.1	The second phase of construction for the Transit Center and Park & Ride facility would entail light grading. This phase would take approximately three weeks and <del>necessitate a crew of eight workers.</del>
2-10	2.5.7.2	The first phase of construction of this component would entail site preparation and excavation, which would take one week and <del>necessitate a crew of 12 workers.</del>
2-11	2.5.7.2	The sixth phase would include paving and curb construction. This phase would take approximately four weeks to complete and <del>would require a crew of four workers.</del>
2-11	2.5.7.3	The construction sequence would start with trenching for the purposes of installing utilities. In total across all sections, installation of utilities is estimated to take 6 weeks. This phase would <del>require a peak construction crew of 4 workers and</del> involve the use of (1) tractor, loader, or backhoe.
2-11	2.5.7.3	The second phase would entail construction of the building envelope, including mechanical, electrical and plumbing work. In total, across all sections, this phase would take approximately 11.5 months, <del>would require a peak construction crew of 45 workers,</del> and involve the use of one (1) crane, three (3) forklifts...
2-12	2.5.7.3	The fourth phase would entail paving (pouring) of foundation. Across all sections this phase would last approximately 2 months, <del>require a peak construction crew of eight workers,</del> and involve the use of two (2) pavers, two (2) pieces of associated paving equipment, and two (2) rollers.
3.1-7	3.1.4	Construction of the overall proposed project is anticipated to take approximately <del>3757</del> months and would occur sometime between 2017 and 2021 ... During the approximate <del>3757</del> -month construction period, the proposed project site would undergo temporary transformations in visual character.
3.3-29	3.3.4	C. Would the project result in a cumulatively considerable <del>new</del> -net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative threshold emissions which exceed quantitative thresholds for ozone precursors)?
3.3-36	3.3.5	The potential for the proposed project to result in a cumulatively considerable impact, specifically a cumulatively considerable <del>new</del> -net increase of any criteria pollutant for which the project region is nonattainment under an applicable NAAQS and/or CAAQS, is addressed in Section 3.3.4.
3.3-24	3.8.6	<b>MM-HAZ-2</b> Prior to obtaining a certificate of occupancy, the removal of the underground storage tank shall be permitted and completed in accordance with the Los Angeles County <del>Fire Department Health Hazardous Materials Division</del> <u>Department of Public Works, Environmental Programs Division, UST Program protocol.</u>
3.12-15	3.12.4	Construction of the overall proposed project is anticipated to take approximately <del>3757</del> months, beginning in February 2017.
3.12-26	3.12.4	As discussed under item 3.12(A), the proposed project would result in temporary noise increases during the planned <del>3757</del> -month construction period.
3.12-28	3.12.4	The proposed project would result in temporary noise increases during the approximately <del>3757</del> -month construction period, as discussed under item 3.12.5(A).

**Table 3-1  
Errata**

Draft EIR Page Number	Section	Clarification/Revision
3.16-6	3.16.2.2	<p>Foothill Transit provides fixed and express bus lines through the City of Covina in the vicinity of the proposed project:</p> <ul style="list-style-type: none"> <li>• Line 281: Glendora – West Covina – Puente Hills Mall</li> <li>• Line 498: Azusa – West Covina – Express Service to Downtown Los Angeles</li> </ul> <p>Line 281 provides local bus service on Citrus Avenue. Line 498 provides express bus service on Grand Avenue to Downtown Los Angeles. However, with the proposed Transit Center Park &amp; Ride, Line 498 is under consideration to be rerouted to provide direct service to the proposed Transit Center Park &amp; Ride.</p> <p><u>Metrolink also provides transportation services in the City of Covina. There is an existing Metrolink station in Covina, located at 600 North Citrus Avenue. This station is served by Metrolink's San Bernardino Line, which connects to downtown Los Angeles and San Bernardino. This station is located approximately 1 mile south of the project site, at the corner of Citrus Avenue and Front Street. The rail lines extend east-west, just to the north of the station.</u></p>
3.16-9	3.16.5	<p>A. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p>
4-15	4.2.3	<p>Under Alternative 3, the event center and the office areas within the iTEC would be divided into two separate structures. A conceptual site plan for this alternative is shown in Figure 4-1. As shown in Figure 4-1, the events center would be located in the southwestern corner of the site and would be 10,000 square feet in size. This building would be one feet story in height. To the east of the event center would be a separate building containing professional office space. This building would total 11,000 square feet. Of this area, approximately 5,000 square feet would be dedicated to business incubator use. This building would be one feet story in height. All other components of the iTEC would remain the same as the proposed project</p>

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## CHAPTER 4 MITIGATION MONITORING AND REPORTING PROGRAM

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California Public Resources Code Section 21081.6 requires that, upon certification of an EIR, “the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.”

This chapter contains the mitigation monitoring and reporting program (MMRP) that has been developed for the Covina Transit-Oriented Mixed-Use Development Project (project or proposed project). This MMRP has been developed in compliance with Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines. The mitigation measures in the table are coded by alphanumeric identification consistent with the EIR. The following items are identified for each mitigation measure:

- **Mitigation Monitoring.** This section of the MMRP lists the stage of the proposed project during which the mitigation measure would be implemented and indicates who is responsible for implementing the mitigation measure (i.e., the “implementing party”). It also lists the agency that is responsible for ensuring that the mitigation measure is implemented and that it is implemented properly.
- **Reporting.** This section of the MMRP provides a location for the implementing party and/or enforcing agency to make notes and to record their initials and the compliance date for each mitigation measure.

The City must adopt this MMRP, or an equally effective program, if it approves the proposed project with the mitigation measures that were adopted or made conditions of project approval.

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<i>Aesthetics</i>						
<b>MM-AES-1</b> New sources of exterior lighting on the project site shall be shielded and directed downward to avoid light spillover onto adjacent residential developments to the north and east. Exterior overhead lighting shall also be of the minimum required intensity to provide for safety and security of project residents and visitors. Nighttime operation of new sources of lighting shall be consistent with that of existing lighting sources in the area.	Project planning and operation	Project applicants	City of Covina Planning Division and Building & Safety Department			
<b>MM-AES-2</b> Prior to the issuance of building permits, the project applicants shall prepare and submit to the City of Covina for review a photometric study for the proposed residential townhome development and parking structure to ensure that off-site residential land uses to the north and east are not subjected to unnecessary light spillover and trespass. A detailed lighting plan shall be developed for the residential townhome development and parking structure and shall be utilized by a qualified photometric specialist to prepare the photometric study. If excessive light spillover is identified in the photometric, then appropriate measures including but not limited to use of lower intensity lighting shall be considered to avoid unnecessary light spillover and trespass.	Project planning and permitting	Project applicants (MLC Holdings Inc. and Foothill Transit); qualified photometric specialist	City of Covina Planning Division and Building & Safety Department			
<i>Air Quality</i>						
<b>MM-AQ-1</b> The following dust control measures shall be implemented by the contractor/build er to reduce fugitive dust PM <sub>10</sub> and PM <sub>2.5</sub> emissions generated during earthmoving construction activities of all three components of the proposed project: <ul style="list-style-type: none"> <li>a. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from</li> </ul>	Construction (earthmoving activities)	Contractor/build er	City of Covina Planning Division			

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<p>leaving the project site and to create a crust after each day's activities cease.</p> <p>b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the project site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 miles per hour.</p> <p>c. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation.</p> <p>d. Speeds on unpaved roads shall be reduced to less than 15 miles per hour.</p> <p>e. All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour.</p> <p>f. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday.</p> <p>g. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/or a minimum 2 feet of freeboard shall be maintained.</p> <p>h. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by the SCAQMD).</p> <p>i. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.</p>						

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<b>MM-AQ-2</b> During project demolition, site preparation, and grading activities, off-road equipment with engines rated at 75 horsepower or greater, shall meet Tier 3 engine standards or better. An exemption from these requirements may be granted by the City of Covina in the event that the applicant documents that (1) equipment with the required tier is not reasonably available (e.g., reasonability factors to be considered include those available within Los Angeles County within the scheduled construction period), and (2) corresponding reductions in criteria pollutant emissions are achieved from other construction equipment. Based on the anticipated equipment for these phases, this measure would be applicable to, but not limited to, excavators, graders, rubber tired dozers, and tractors/loaders/backhoes used during earth moving activities.	Construction (demolition, site preparation, and grading)	Contractor/build er	City of Covina Planning Division			
<i>Biological Resources</i>						
<b>MM-BIO-1</b> Ground-disturbance and vegetation removal activities should take place outside of the general nesting bird season, from approximately March 1 through August 31 (as early as February 1 for raptors), to the greatest extent feasible. If vegetation removal and/or construction activities (including disturbances to vegetation, structures, and substrates) will occur during the general bird nesting season (i.e., between March 1 and August 31, and as early as February 1 for raptors), preconstruction surveys for nesting native birds and raptors shall be conducted by a qualified biologist, no more than 3 days prior to construction activities. The qualified biologist shall survey the construction zone and a 250-foot radius surrounding the construction zone (500-foot radius for raptors) to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds or raptors.	Prior to construction; during construction (if active nests are identified)	Contractor/build er; qualified biologist	City of Covina Planning Division			

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<p>If active nests are found (California Department of Fish and Wildlife defines “active” as any nest that is under construction or modification; United States Fish Wildlife Service defines “active” as any nest that is currently supporting viable eggs, chicks, or juveniles), clearing and construction shall be postponed or halted within a buffer area established by the qualified biologist that is suitable to the particular bird species and location of the nest (typically a starting point of 250 feet for most birds and 500 feet for raptors, but may be reduced as approved by a qualified biologist), until the nest is vacated and/or juveniles have fledged, as determined by the qualified biologist. The construction avoidance area shall be clearly demarcated in the field (i.e., fencing, staking, or flagging) for avoidance. 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. The results of the surveys, including graphics showing the locations of any active nests detected, and documentation of any avoidance measures taken, shall be submitted to the City of Covina within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds. Surveys, and resulting buffers, will be repeated if construction within any phase is paused for more than 30 days.</p>						
<p><b>MM-BIO-2</b> No more than 30 days prior to construction (including demolition work and tree trimming/removal activities), a qualified biologist will conduct a visual and acoustic preconstruction survey for roosting special-status bats and/or sign (i.e., guano) within 300 feet of suitable bat roosting habitat (i.e., buildings and/or trees). A minimum of one day and one evening will be included in the visual preconstruction survey, which should concentrate on the</p>	<p>Prior to construction; during construction (if active bat roosts identified)</p>	<p>Contractor/build er; qualified biologist</p>	<p>City of Covina Planning Division</p>			

**Table 4-1  
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Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<p>period when roosting bats are most detectable (i.e., when leaving the roosts between one hour before sunset and two hours after sunset). If special-status bats are not detected, no additional measures are required.</p> <p>If an active maternity roost is identified, the maternity roost will not be directly disturbed, and construction activities will maintain an appropriate distance (e.g., 300-foot avoidance buffer) until the maternity roost is vacated and juveniles have fledged, as determined by a qualified biologist. The rearing season for native bat species in California is approximately March 1 through August 31. If non-breeding special-status bat roosts (hibernacula or non-maternity roosts) are found, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by a qualified biologist (e.g., installation of one-way doors). If flushing species from a tree roost is required, this shall be done when temperatures are sufficiently warm for bats to exit the roost, because bats do not typically leave their roost daily during winter months. In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of one week. If a roost needs to be removed and a qualified biologist determines that the use of one-way doors is not necessary, the roost shall first be disturbed following the direction of the qualified biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the roost removal).</p>						

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<i>Cultural Resources</i>						
<p><b>MM-CUL-1 Inadvertent Discovery of Archaeological Resources.</b> In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</p>	Construction	Contractor/build er; qualified archaeologist	City of Covina Planning Division			
<p><b>MM-CUL-2 Paleontological Mitigation Program.</b> Prior to commencement of any grading activity on-site, the City, Foothill Transit and MLC shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or qualified designee. The qualified paleontologist shall attend the preconstruction meeting and be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed older Quaternary alluvial deposits, if encountered. These deposits may be encountered at depths as shallow as 10 feet below ground surface. 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</p>	Prior to and during grading activity	Project applicants; contractor/build er; qualified paleontologist	City of Covina Planning Division			

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
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) (2010).						
<b>MM-CUL-3 Inadvertent Discovery of Human Remains.</b> In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.	Construction (ground disturbance)	Contractor/build er	City of Covina Planning Division			

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<i>Geology and Soils</i>						
<b>MM-GEO-1</b> Prior to the construction phase, the proposed project shall be designed in accordance with the recommendations from the site-specific Geotechnical Evaluation. In the event that changes are made in the recommendations set forth in the final geotechnical report, the project design shall be updated in accordance with those changes. Prior to the issuance of a building permit, the City of Covina, Foothill Transit and MLC Holdings, Inc./Meritage Homes shall submit the final design and construction plans for review and approval by the City Building Official or designee and the City Engineer or designee. The final design and construction plans shall show that the recommendations from the Geotechnical Evaluation regarding earthwork, design, foundation, retaining wall, garden wall, soil corrosivity, import soils, concrete slabs, sidewalks, and driveways have been incorporated into the final design.	Project planning and permitting	Project applicants	City of Covina Planning Division and Building & Safety Department			
<i>Hazards and Hazardous Materials</i>						
<b>MM-HAZ-1</b> Prior to demolition of the existing building, an asbestos survey and lead-based paint survey shall be conducted by a California Occupational Safety and Health Administration-certified asbestos and lead-based paint consultant and/or certified site surveillance technician. A report documenting material types, conditions, and general quantities will be provided, along with photos of positive materials and diagrams. Demolition plans and contract specifications shall incorporate any abatement procedures for the removal of material containing asbestos and/or lead-based paint. All abatement work shall be done in accordance with federal, state, and local regulations.	Prior to demolition; during demolition (if hazardous building materials are identified)	Project applicants; contractor/build er	City of Covina Planning Division and Building & Safety Department			

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<b>MM-HAZ-2</b> Prior to obtaining a certificate of occupancy, the removal of the underground storage tank shall be permitted and completed in accordance with the Los Angeles County Fire Department Health Hazardous Materials Division protocol.	Prior to or during construction	Project applicants	City of Covina Planning Division and Building & Safety Department; Los Angeles County Fire Department Health Hazardous Materials Division			
<b>MM-HAZ-3</b> Prior to obtaining a certificate of occupancy, the hydraulic lift units shall be removed by a licensed contractor and the soil beneath the reservoir area shall be sampled by a qualified environmental consulting firm. At a minimum, soil samples shall be analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and polychlorinated biphenyls (PCBs). Should visually stained soil be observed in the reservoir pit area, additional soil samples shall be collected to further evaluate subsurface impact. Should TPH, VOCs, or PCBs be detected in the soil sample(s), the environmental consult shall advise the City of Covina about additional steps to be taken, which may include regulatory agency notification and remediation. Additional sampling may also be required prior to the disposal of the hydraulic lift units.	Prior to or during construction	Project applicants	City of Covina Planning Division and Building & Safety Department			
<i>Noise</i>						
<b>MM-NOI-1</b> Construction activities shall take place during the permitted time and day per Chapter 9.40.110 of the City's Municipal Code. The applicant shall ensure that construction activities are limited to the hours of 7 a.m. to 8 p.m. Monday through Saturday, and not at all during other hours or on Sundays or public holidays. This condition shall be listed on the project's final design to the satisfaction of the City Engineering Department.	Construction	Project applicants; contractor/ builder	City of Covina Planning Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measure	Mitigation Monitoring			Reporting		
	Implementing Period	Implementing Party	Enforcing Agency	Comments	Date	Initials
<p><b>MM-NOI-2</b> The City of Covina shall require the applicant to adhere to the following measures as a condition of approving the grading permit:</p> <ul style="list-style-type: none"> <li>• The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.</li> <li>• All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City Engineering Department.</li> <li>• Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.</li> <li>• During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.</li> <li>• Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions</li> </ul>	Construction	Project applicants; contractor/ builder	City of Covina Planning Division			

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Mitigation Measure	Mitigation Monitoring			Reporting		
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<p>shall be implemented and a report of the action provided to the reporting party.</p> <ul style="list-style-type: none"> <li>If equipment is being used that can cause hearing damage at adjacent noise receptor locations (distance attenuation shall be taken into account), portable noise barriers shall be installed that are demonstrated to be adequate to reduce noise levels at receptor locations below hearing damage thresholds. This may include erection of temporary berms or plywood barriers to create a break in the line-of-sight, or erection of a heavy fabric tent around the noise source.</li> </ul>						
<p><b>MM-NOI-3</b> The proposed parking structure shall be designed such that the easternmost side of the structure is not open, for the purpose of preventing parking noise on upper floors emanating directly into the adjacent community. This feature (or other measures which otherwise ensure that noise from parking activities would not exceed City of Covina noise standards) shall be verified by City staff prior to final design approval.</p>	Project planning and permitting	Project applicant (Foothill Transit)	City of Covina Planning Division			
<p><b>MM-NOI-4</b> Because heating, ventilation, and air conditioning (HVAC) equipment and other mechanical equipment can generate noise that could affect surrounding sensitive receptors for all phases of the project and because the details, specifications, and locations of this equipment is not yet known, the project applicant shall retain an acoustical specialist to review project construction-level plans at each phase of the project to ensure that the equipment specifications and plans for HVAC and other outdoor mechanical equipment incorporate measures, such as the specification of quieter equipment or provision of acoustical enclosures, that will not exceed relevant noise standards at nearby noise-sensitive land uses (e.g., residential). Prior to the commencement of construction for each phase of the overall project (all three components), the</p>	Project planning and construction	Project applicants; acoustical specialist	City of Covina Planning Division			

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Mitigation Measure	Mitigation Monitoring			Reporting		
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acoustical specialist shall certify in writing to the City that the equipment specifications and plans incorporate measures that will achieve the relevant noise limits.						
<b>MM-NOI-5</b> Prior to certificate of occupancy, signs shall be posted at the planned recreation area prohibiting noisy activities between the hours of 10:00 p.m. and 7:00 a.m.	Project operation	Project applicant (MLC Holdings Inc.)	City of Covina Planning Division			
<b>MM-NOI-6</b> The proposed residential balconies and patio areas located along the first row with a direct, unobstructed view of North Citrus Avenue would require a noise barrier with a minimum height of 5 feet. The noise barriers may be constructed of a material such as tempered glass, acrylic glass (or similar material), masonry material, manufactured lumber (or a combination of these) with a surface density of at least three pounds per square foot. The noise barriers should have no openings or cracks.	Project planning and operation	Project applicant (MLC Holdings Inc.)	City of Covina Planning Division			
<b>MM-NOI-7</b> The residential units in the first row east of North Citrus Avenue will most likely require mechanical ventilation systems or air conditioning systems in order to ensure that windows and doors can remain closed while maintaining a comfortable environment. Additionally, sound-rated windows may be necessary. An interior noise analysis shall be required for the proposed dwelling units in the first row east of North Citrus Avenue prior to issuance of building permits. Installation of these systems (i.e., HVAC and sound-rated windows) shall be required if the interior noise analysis shows that impacts are above the State and City's 45 dBA L <sub>dn</sub> interior standard. The interior noise analysis shall substantiate that with the required mitigation, the resulting interior noise levels will be less than the noise standard, and thus, will be a less than significant impact.	Project planning and construction	Project applicant (MLC Holdings Inc.)	City of Covina Planning Division			

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