

**COVINA FORWARD PROJECT**  
**PUBLIC COMMENT LETTERS**

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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 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 concerned 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.

-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.

-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.

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.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Siongco', with a long horizontal flourish extending to the right.

Philip Siongco



# 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  
DUARTE  
EL MONTE  
GARDENA  
GLENDALE  
HAWAIIAN GARDENS

HAWTHORNE  
HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY  
INGLEWOOD  
IRVINDALE  
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  
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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.

Brian K. Lee, Director  
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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.

Brian K. Lee, Director  
October 4, 2016  
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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.

Brian K. Lee, Director  
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**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

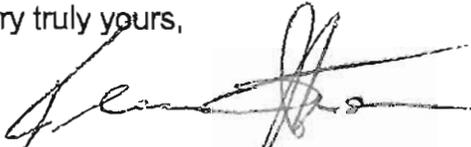
The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and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

**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.

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:



CITRUS VALLEY HEALTH PARTNERS

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,

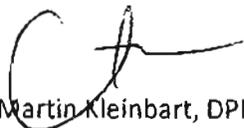
On behalf of Citrus Valley Health Partners (CVHP), I am writing to express our support for the Covina Forward project.

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

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 ½ 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:

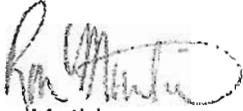
1. **Section 3.4 Existing Transit Services** (Page 18), please also include Metrolink, San Bernardino Line – San Bernardino to Downtown Los Angeles.
2. **Figure 3.2-1**, please include the rail lines and Covina Metrolink Station on the map of Existing Conditions.
3. **Executive Summary (ES-3)**, an additional 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.



Mr. Brian Lee  
October 25, 2016  
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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,

A handwritten signature in black ink, appearing to read "Ron Mathieu". The signature is fluid and cursive, with the first name "Ron" and last name "Mathieu" clearly distinguishable.

Ron Mathieu  
Sr. Public Projects Specialist

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



October 25, 2016

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

935 W. Badillo Street, Suite 100  
Covina, California 91722-4164  
**626.967.4191** fax 626.966.9660  
[www.covina.org](http://www.covina.org)

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,

A handwritten signature in black ink, appearing to read "Dawn Nelson", written over a horizontal line.

Dawn Nelson  
President/CEO

**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).

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

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/for\\_ccqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/for_ccqa_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.

Mr. Brian K. Lee  
October 27, 2016  
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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,

A handwritten signature in black ink, appearing to read "Dianna Watson". The signature is written in a cursive style and is positioned above the printed name.

DIANNA WATSON  
Branch Chief  
Community Planning & LD / IGR Review

cc: Scott Morgan, State Clearinghouse

# BLUM | COLLINS LLP

Aon Center  
707 Wilshire Boulevard  
Suite 4880  
Los Angeles, California  
90017

213.572.0400 phone  
213.572.0401 fax

October 27, 2016

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

VIA EMAIL TO:  
[blee@covinaca.gov](mailto: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).

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.

### 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, NO<sub>x</sub> emissions still exceed the SCAQMD threshold.

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%

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

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.

Brian K. Lee  
October 27, 2016  
Page 5

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.

Sincerely,

A handwritten signature in black ink, appearing to be 'Gary Ho', written in a cursive style.

Gary Ho  
BLUM | COLLINS LLP



# COVINA-VALLEY

UNIFIED SCHOOL DISTRICT

District Superintendent  
Richard M. Sheehan, Ed.D.

Board of Education  
Sonia Frasquillo  
Charles M. Kemp

October 28, 2016

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

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 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



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 Developemnt 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

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2016051053  
**Project Title** Covina Transit Oriented Mixed-Use Developemnt Project  
**Lead Agency** Covina, City of

**Type** EIR Draft EIR

**Description** The proposed project would redevelop the project site with a mixed use development consisting of the Covina Innovation Technology, and Event Center (iTEC), a Transit Center/Park & Ride facility, and a residential development. The residential component would be situated in the northern portion of the site, while the iTEC and the Transit Center/Park & Ride facility would be situated in the southern portion of the site. The project is the result of coordination between three distinct entities, each of which would design, own, and operate their respective portion of the overall mixed-use development. The City would design, own, and operate the ITEC; Foothill Transit would design, own, and operate the Transit Center/Park & Ride facility, and a private developer (MLC Holdings, Inc.) would design, own, and operate the residential component.

**Lead Agency Contact**

**Name** Brian K. Lee  
**Agency** City of Covina  
**Phone** 626-384-5458 **Fax**  
**email**  
**Address** 125 E. College Avenue  
**City** Covina **State** CA **Zip** 91723

**Project Location**

**County** Los Angeles  
**City** Covina  
**Region**  
**Lat / Long** 34° 06' 01" N / 117° 53' 20" W  
**Cross Streets** 1162 North Citrus Ave., & 177 East Covina Blvd.  
**Parcel No.** 8406-019-019 & 8406-019-020  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** SR-39  
**Airports**  
**Railways** Metrolink  
**Waterways** Walnut Creek, Charter Oak Wash  
**Schools** Charter/Glen Oak/ Badill  
**Land Use** GPD: General Commercial Zoning; C-3A (Regional or Community Shopping Center)/C-R (Comm Rec)

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

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

**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 & Research

October 27, 2016

OCT 27 2016

STATE CLEARINGHOUSE

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

clear  
 10/27/16E

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

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.

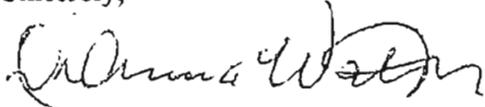
Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

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