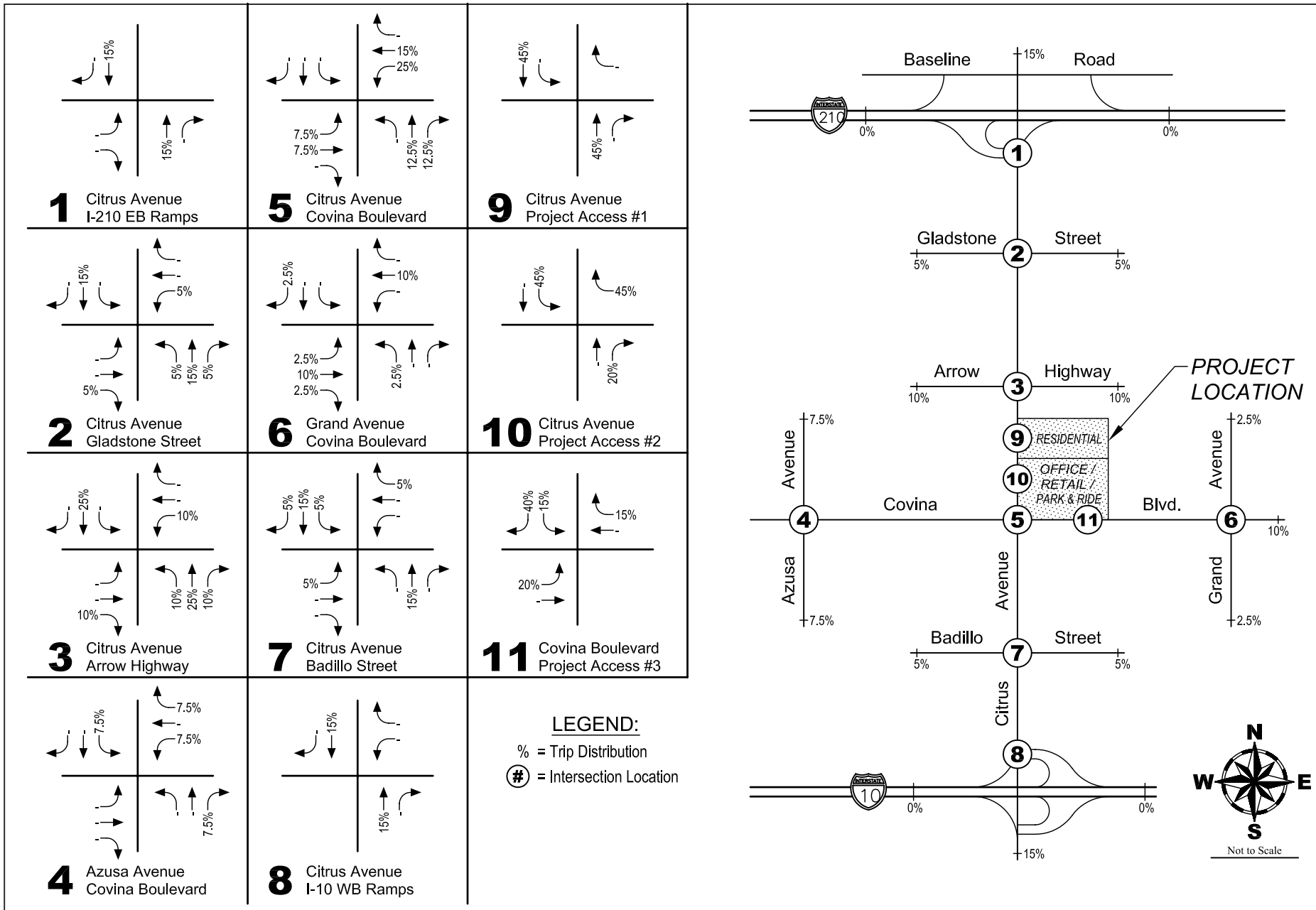

SOURCE: HARTZOG & CRABILL, INC. 2016

DUDEK

FIGURE 3.16-3c

Project Trip Distribution–Transit Park & Ride

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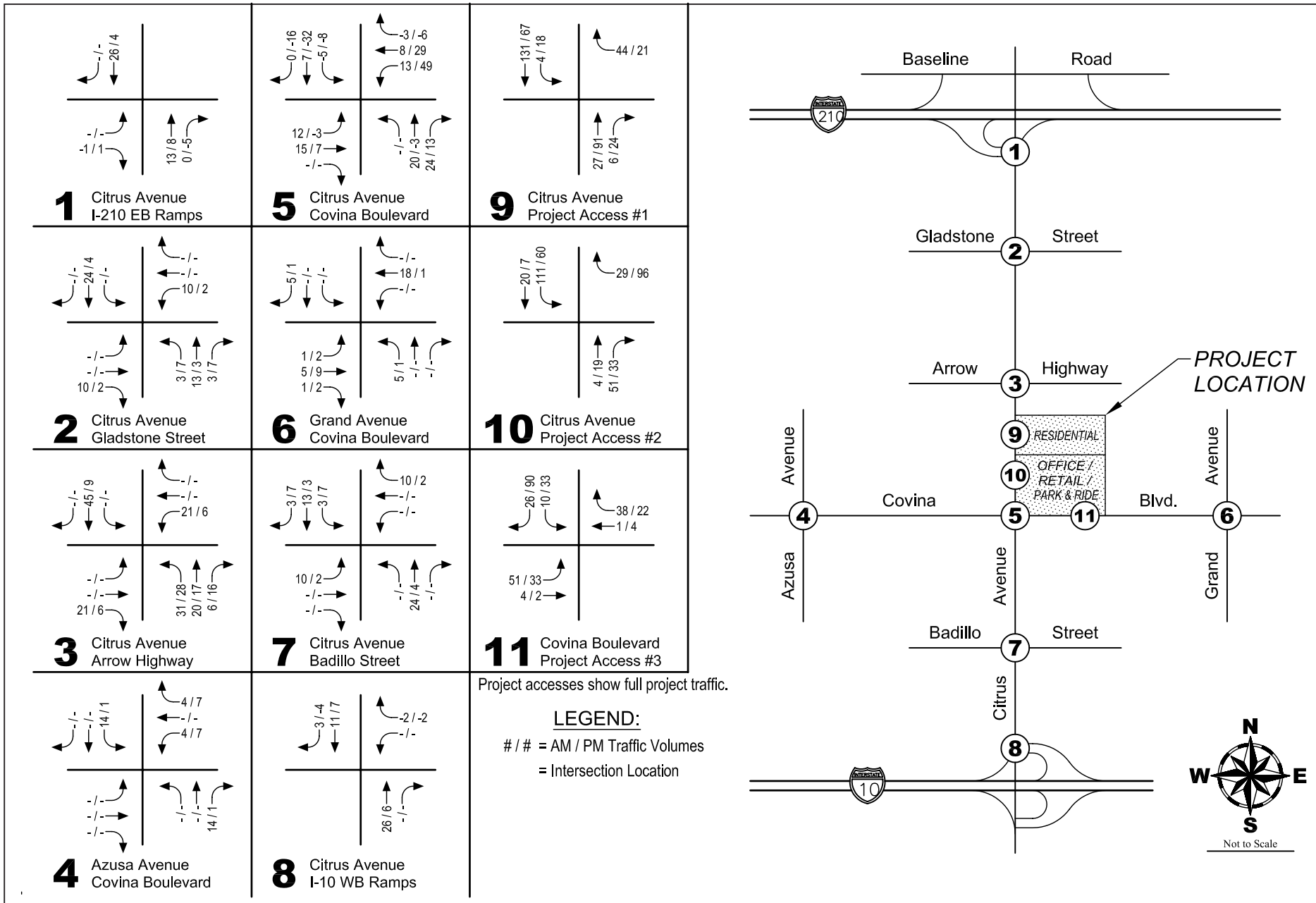

SOURCE: HARTZOG & CRABILL, INC. 2016

FIGURE 3.16-4
Project Trip Assignment

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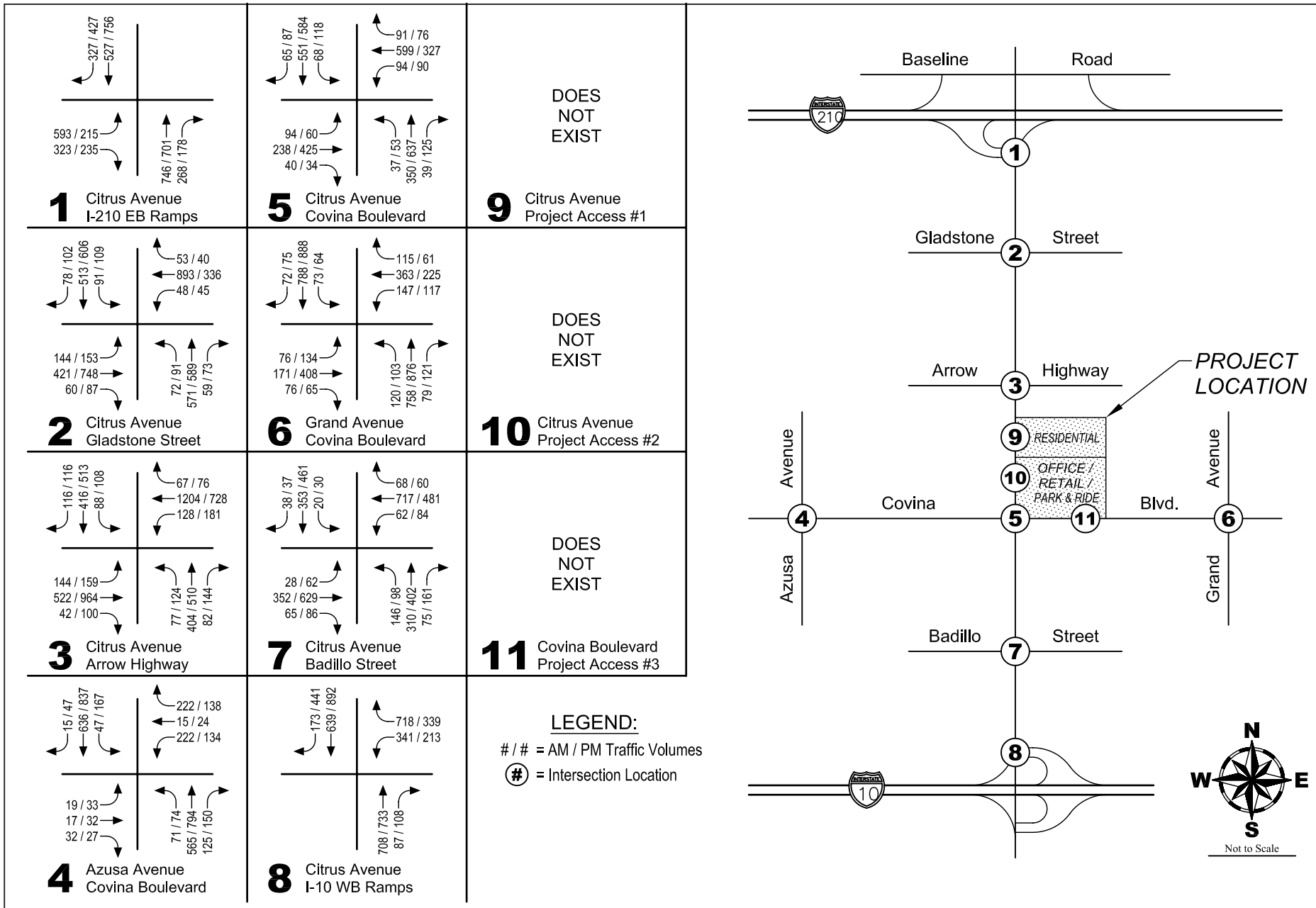

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SOURCE: HARTZOG & CRABILL, INC. 2016

FIGURE 3.16-5

2017 without Project Volumes

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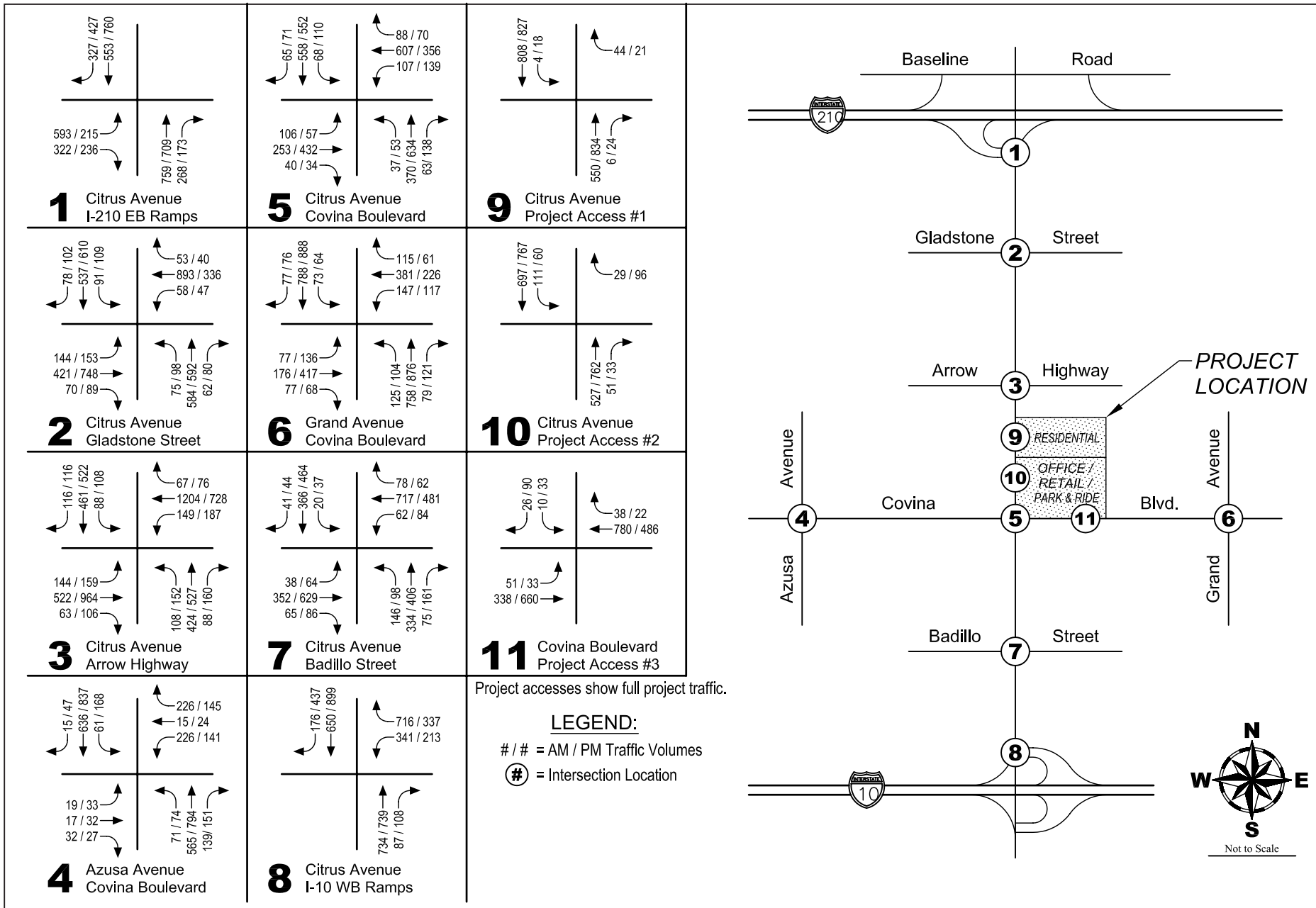

SOURCE: HARTZOG & CRABILL, INC. 2016

FIGURE 3.16-6
2017 with Project Volumes

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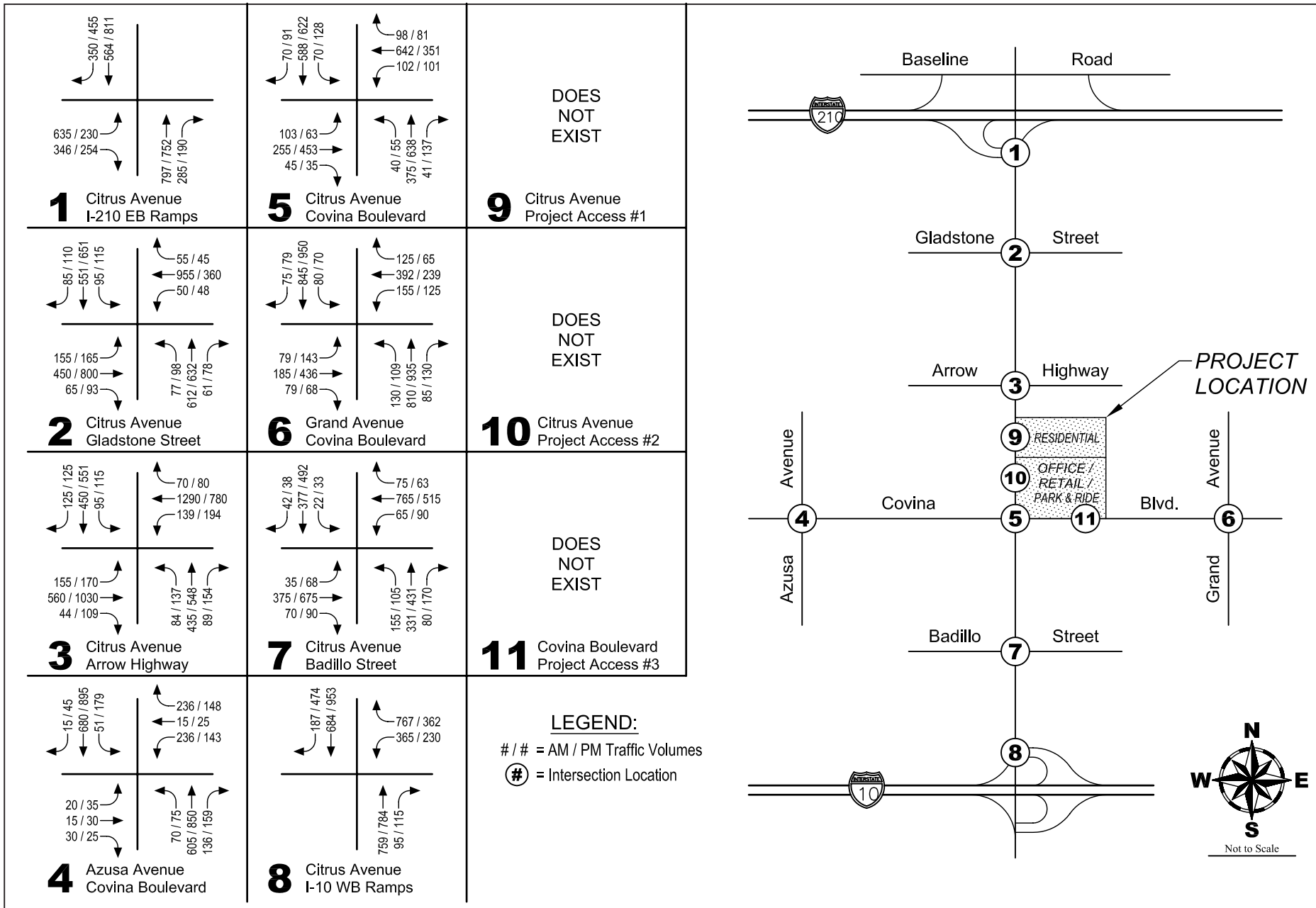

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SOURCE: HARTZOG & CRABILL, INC. 2016

FIGURE 3.16-7

2036 without Project Volumes

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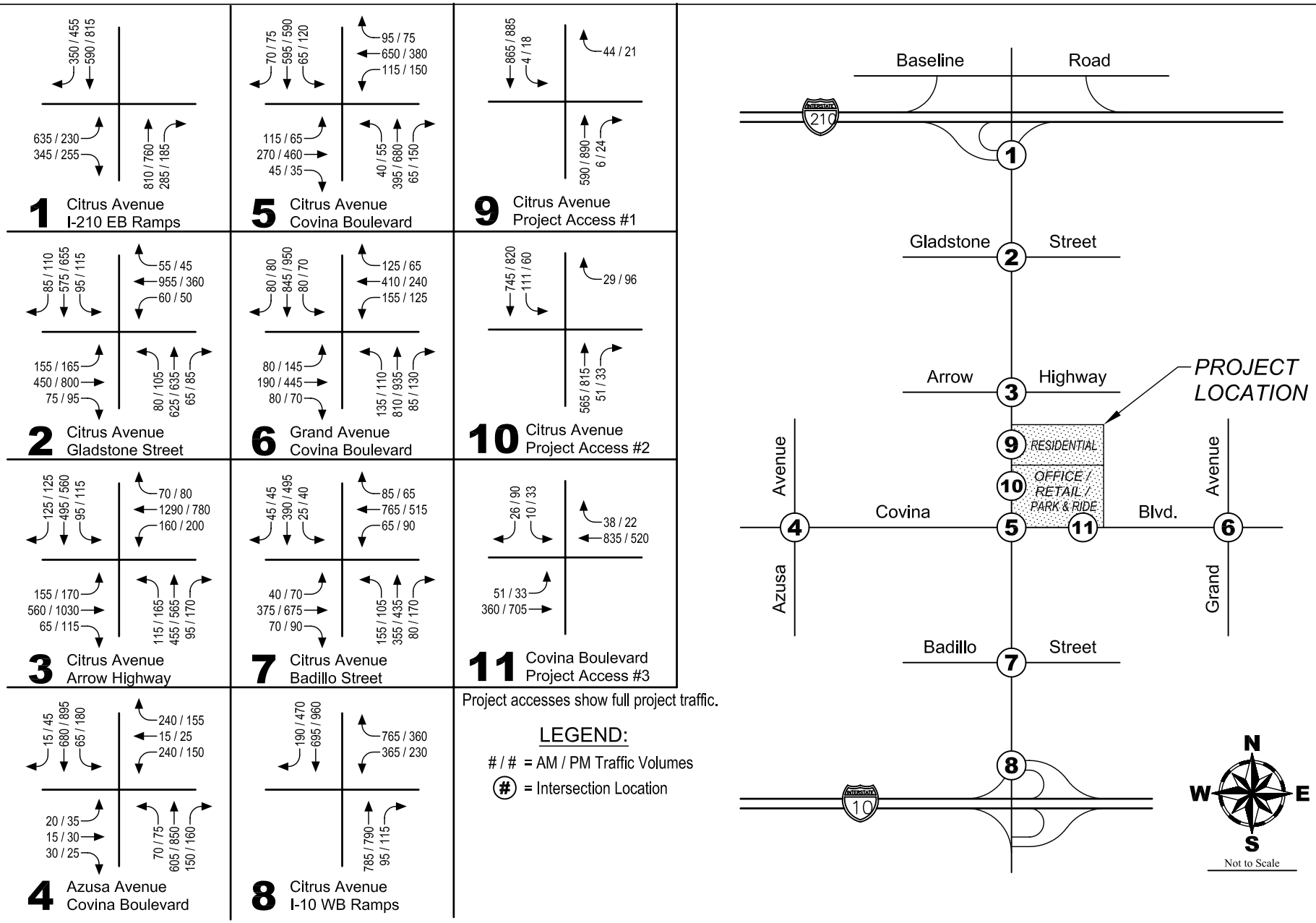

SOURCE: HARTZOG & CRABILL, INC. 2016

DUDEK

FIGURE 3.16-8

2036 with Project Volumes

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3.17 UTILITIES AND SERVICE SYSTEMS

This section describes the utilities and service systems that would serve the proposed Covina Transit-Oriented Mixed-Use Development Project (project or proposed project) site. Analysis within this section identifies associated regulatory requirements and identifies potential impacts related to implementation of the proposed project.

3.17.1 Existing Conditions

Water Service

Water service for the proposed project would be served by Azusa Light & Water (ALW). ALW's service area encompasses about 14.2 square miles in the San Gabriel Valley including a portion of five cities and portions of unincorporated Los Angeles County. The water service area includes the City of Azusa and portions of the cities of Glendora, Covina, West Covina, Irwindale, and unincorporated Los Angeles County (ALW 2016). ALW's water supplies come from a combination of imported water from the Metropolitan Water District (which imports water from the Colorado River and the Sacramento-San Joaquin Bay Delta), groundwater from 11 municipal water wells, and local surface water (diversions from the San Gabriel River and the Morris Reservoir) (ALW 2016). Normally groundwater and local surface water diversions are sufficient to supply the service area, but ALW has the ability to import water from MWD in emergency situations (ALW 2016). On average, ALW supplies 19,615 acre-feet per year (afy) of water to its service area, with 12,993 afy (or 66%) of it from groundwater, and 6,622 afy (or 34%) of it from local surface water (ALW 2016).

Sewer System

The City of Covina's sanitary sewer collection system is managed by the City's Public Works Department. An 8-inch public sewer collection line parallels N. Citrus Avenue adjacent to the proposed project (City of Covina 2014). The City's sewer lines ultimately connect to trunk sewers operated by the Sanitation Districts of Los Angeles County (SDLAC) for transmission, treatment and disposal. The proposed project is located within CSDLAC District 22, which is one of the seventeen districts that form the Join Outfall System (JOS) (CSDLAC 2016). The JOS covers approximately 660 square miles, from the foothills of the San Gabriel Mountains in the north to San Pedro Bay in the south, and from the Los Angeles city limits on the west to the Los Angeles County border on the east. This system provides sewage treatment, reuse and disposal for residential, commercial, and industrial users. The JOS includes the main Joint Water Pollution Control Plant in Carson, and six satellite water reclamation plants (WRPs). The sewer trunk lines that collect sewage from the project area direct it the San Jose Creek WRP. The San Jose Creek WRP has the capacity to provide primary, secondary, and tertiary treatment for 100 million gallons per day (mgd) of wastewater and serves a large residential population of

approximately one million people. The San Jose Creek WRP currently processes an average flow of 65.7 mgd of wastewater, resulting in a remaining capacity of approximately 34.3 mgd of wastewater (CSDLAC 2016).

The City requires that any discharge of non-domestic wastewater (e.g., industrial facilities, food service, and certain service commercial facilities) to the City's sewer system must be authorized through an industrial wastewater permit (City of Covina 2016a).

Storm Drain System

The project site would be served by the municipal storm drain system maintained by the Los Angeles County Flood Control District. The nearest connection consists of a 42-inch reinforced concrete pipe located at the corner of E. Cypress Street and North Citrus Avenue (County of Los Angeles 2016).

Solid Waste and Recycling Services

Covina Disposal (Athens Services) is the City of Covina's exclusive franchise hauler. Athens Services currently transports all of Covina's commercial waste to a Material Recovery Facility, where recyclable materials are sorted and then diverted from local landfills. As a result, Covina businesses and apartment complexes that are serviced by Athens Services are already in compliance with AB 341 (See Section 3.17.2, Regulatory Setting, below).

Electrical Service

Electrical services to the project site would be provided by Southern California Edison (SCE).

Telecommunications Service

Telecommunication services would be provided by Time Warner, Charter Spectrum, or Verizon.

3.17.2 Regulatory Setting

Federal

Federal Clean Water Act of 1977

Section 401 of the Clean Water Act (CWA) requires that an applicant for any federal permit (e.g., a U.S. Army Corps of Engineers (ACOE) Section 404 permit) obtain certification from the state that the discharge would comply with other provisions of the CWA and with state water quality standards. For example, an applicant for a permit under Section 404 of the CWA must also obtain water quality certification per Section 401 of the CWA. Section 404 requires a permit

from the ACOE prior to discharging dredged or fill material into waters of the United States, unless such a discharge is exempt from CWA Section 404.[1] For the project area, the Santa Ana RWQCB must provide the water quality certification required under Section 401 of the CWA. Water quality certification under Section 401, and the associated requirements and terms, is required in order to minimize or eliminate the potential water quality impacts associated with the action(s) requiring a federal permit.

Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources. Section 404 of the CWA established a permit program to regulate the discharge of dredged or fill material into waters of the United States. Section 303 of the CWA requires states to identify surface waters that have been impaired. Under Section 303(d), states, territories, and authorized tribes are required to develop a list of water quality segments that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology (33 U.S.C. Section 1251 et seq.).

State

Protection of Underground Infrastructure

California Government Code, Section 4216 et seq., requires an excavator to contact a regional notification center (e.g., Underground Service Alert (USA) or Dig Alert) at least 2 days prior to excavation of any subsurface installations. Any utility provider seeking to begin a project that could damage underground infrastructure can call USA Southern California, the regional notification center for Southern California. USA will notify the utilities that may have buried lines within 1,000 feet of the project. Representatives of the utilities, once notified, are required to mark the specific locations of their facilities within the work area prior to the start of project activities.

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Assembly Bill (AB) 939), administered by the California Integrated Waste Management Board, regulates nonhazardous solid waste. The law provides a solid waste management system to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible and in an efficient and cost-effective manner to conserve natural resources, to protect the environment, and to improve landfill safety. Local agencies are required to establish recycling programs, reduce paper waste, purchase recycled products, and implement integrated waste management programs that conform

[1] The term "waters of the United States" as defined in the Code of Federal Regulations (40 CFR 230.3(s)) includes all navigable waters and their tributaries.

to the State's requirements (California Public Resources Code, Section 40000 et seq.). AB 939 specifically required that each city and county in California divert 25% of its waste stream by 1995 and 50% by 2000 (CalRecycle 1997). The bill also required each state agency to develop and adopt an integrated waste management plan, in consultation with the Waste Management Board, before July 1, 2000.

Senate Bill X7-7

Senate Bill (SB) X7-7, which became effective on February 3, 2010, is the water conservation component to the Delta legislative package (SB 1, Delta Governance / Delta Plan). It seeks to implement water use reduction goals established in 2008 to achieve a 20% statewide reduction in urban per capita water use by December 31, 2020. The bill requires each urban retail water supplier to develop urban water use targets to help meet the 20% goal by 2020 and an interim 10% goal by 2015. The bill establishes methods for urban retail water suppliers to determine targets to help achieve water reduction targets. The retail water supplier must select one of the four compliance options. The retail agency may choose to comply with SB X7-7 as an individual or as a region in collaboration with other water suppliers. Under the regional compliance option, the retail water supplier still has to report the water use target for its individual service area. The bill also includes reporting requirements in the 2010, 2015, and 2020 Urban Water Management Plans.

State Agency Model Integrated Waste Management Act of 1999

AB 75 was passed in 1999, and the State Agency Model Integrated Waste Management Act (Chapter 764, Statutes of 1999, Strom-Martin) took effect on January 1, 2000. The State Agency Model Integrated Waste Management Act mandated that state agencies develop and implement an integrated waste management plan. The act also mandated that community service districts providing solid waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located. Provisions of the Act require all state agencies and large state facilities to divert at least 50% of solid waste from landfills after 2004 and that each state agency and large facility submit an annual report to the California Department of Resources Recycling and Recovery summarizing its yearly progress in implementing waste diversion programs (CalRecycle 2012).

Energy Conservation Policies

- **Executive Order S-12-04.** This order requests the participation of all state agencies under the authority of the Governor and other entities not under the direct authority of the Governor to institute energy conservation measures that will reduce energy consumption. Additionally, the order requests that all state agencies review and assess energy

conservation policies currently in place and expand those measures to all applicable facilities (State of California 2004a).

- **Executive Order S-20-04.** This order requires the State to commit to "aggressive" action to reduce state building energy usage by retrofitting, building, and operating energy and resource efficient buildings, and by taking all cost-effective measures described in the Green Building Action Plan for facilities owned, funded, or leased by the State. Executive Order S-20-04 requests that California Community Colleges participate in the effort to reduce energy usage (State of California 2004b).
- **State Executive Order S-3-05.** This order directs the State to reduce greenhouse gas emissions, which are linked to energy efficiency (State of California 2005).

Title 24 of the California Code of Regulations

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and nonresidential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in Title 24 guidelines.

Local

Covina General Plan

Land Use Element

The Land Use Element generally seeks to ensure zoning codes, allowed development intensities, and other land use policies not infringe upon its ability to provide adequate community services and utilities.

Natural Resources Element Policy Area 1 - Water Resources and Air Quality

i. The City shall ensure the adequacy of water supplies to meet all existing and future demands and applications, particularly public safety.

j. The City shall where necessary, work with other water providers serving Covina residents and businesses to ensure sufficient service and to communicate important issues and needs.

k. The City shall ensure adequate water pressure for all uses and purposes.

l. The City shall follow the Covina Water Conservation Ordinance, when necessary, and provide conservation kits and general information to best promote water conservation.

m. The City shall follow the City's Water-Efficient Landscape Ordinance for the sites of new and significantly expanded/remodeled developments as a viable conservation tool.

n. The City shall encourage the incorporation of water conservation features in the design of all new and significantly expanded/remodeled developments and in the installation of conservation devices in existing developments, including, but not limited to, low-flow toilets and shower registers.

Covina Municipal Code

Section 13.50 of the Covina Municipal Code (Adoption of the Sanitary Sewer and Industrial Waste Code of the County of Los Angeles), industrial facilities and certain commercial facilities (including food service facilities) which plan to discharge industrial wastewater to the City's sewage collection and treatment system are required to first obtain an industrial wastewater permit. The permit provides a means for the City of Covina to protect its sewer collection and treatment systems (from being clogged or damaged) and to prevent regulated toxic wastewater constituents from passing through to receiving waters and recovered biosolids. Industrial wastewater is any water carrying waste other than domestic wastewater; this includes wastewater containing fats, oils and greases at food service establishments (City of Covina 2016a).

3.17.3 Thresholds of Significance

The following significance criteria are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), and will be used to determine the significance of potential utilities and service systems impacts. Impacts related to utilities and service systems would be significant if the proposed project would:

A. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

B. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

C. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

D. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

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

F. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

3.17.4 Impacts Analysis

A. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The proposed project would connect to municipal water service provided by Azusa Light and Water (ALW), and deliver sewage into the City's sewer collection system operated and maintained by the City's Public Works Department. The Sanitation Districts of Los Angeles County (SDLAC) manages, operates and maintains the larger sewer trunk lines into which the City's collection system feeds. Although the proposed project would include construction of private water distribution and wastewater collection facilities necessary to serve the development (i.e., pipes, valves, meters, etc.), no sanitary wastewater treatment is proposed on-site. The Los Angeles RWQCB wastewater treatment requirements as well as State Water Resources Control Board (Division of Drinking Water) potable water treatment requirements are applicable to the SDLAC and ALW (i.e., the water and wastewater service providers) rather than the proposed project itself. Wastewater treatment requirements that would apply to the proposed project are therefore limited to treatment of stormwater runoff due to its potential to carry pollutants as well as any discharge of non-domestic wastewater to the City's sewer system.

- **Stormwater Treatment**: As discussed in Chapter 3.9, Hydrology and Water Quality, the project would need to integrate permanent water quality best management practices and low impact development features in compliance with the regional MS4 Permit and the City of Covina stormwater and runoff pollution control ordinance (Covina Municipal Code Section 8.50.050). Although detailed plans have not yet been submitted, these would likely consist of source control measures, landscaping, bioretention swales/basins, infiltration trenches, or other measures to be determined when plans are finalized. The City would not issue grading or occupancy permits without first verifying such features comply with Covina Municipal Code Chapter 8.50 and NPDES requirements.
- **Industrial Wastewater Permit**: For industrial and certain commercial facilities that would discharge non-domestic wastewater to the City's sewer system, Section 13.50 of the Covina Municipal Code requires that such facilities first obtain an industrial

wastewater permit. This permit would be required if the 4,800-square foot retail building for the Transit Center and Park & Ride Facility is used as a food service establishment, or if it were to include any automotive/service facilities. The permit would be required as a condition to operate, and would ensure all necessary pre-treatment systems (e.g., grease interceptors) are installed and properly operated/maintained by the facility owner/operator (City of Covina 2016a). The purpose of the industrial wastewater permit is to prevent damage to the sewer system from discharge of non-domestic wastewater (which includes grease, oils, and fats that could clog the system) and/or waste types that the sewer system was not designed to treat.

ALW and the SDLAC are required to treat potable water and wastewater in accordance with federal, State and local regulations. ALW routinely monitors its surface and groundwater supplies to meet the Primary Standards (mandatory health-related standards) as well as Secondary Standards (aesthetic standards), and treats its water supplies to meet all regulatory standards for potable use (ALW 2016). Furthermore, sewage generated by the proposed project would be treated in accordance with applicable waste discharge requirements prior to being discharged. Both the City and the SDLAC are subject to compliance with Statewide General Waste Discharge Requirements and Monitoring and Reporting Program (WDRs) for sanitary sewer systems (State Water Resources Control Board Order No. 2006-003). The purpose of the WDR is to ensure that the City (and County) properly maintains and manages its sewer system and reduces frequency and severity of sanitary sewer overflows and their potential impacts on public health, safety, and the environment (City of Covina 2014). The regional wastewater treatment plants are subject to their own individual NPDES and waste discharge requirements that set standards and criteria for the quality of the effluent produced.

Because the proposed project would be compliant with the regional MS4 Permit, and because the proposed project would be serviced by regional water/sewer providers (rather than proposing on-site treatment), the impact with respect to wastewater treatment requirements would be **less than significant**. No mitigation is required.

B. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As indicated above, the proposed project would construct water distribution and wastewater collection infrastructure (i.e., pipes, valves, meters, etc.), but would not require construction of on-site potable water or domestic wastewater treatment facilities. The construction of stormwater treatment facilities, and if required, industrial wastewater treatment systems (e.g., grease interceptors for food service facilities) is addressed above

under criterion A) and the applicable permits. Their construction/operation would not have environmental impacts beyond those already analyzed as part of overall footprint/disturbance impacts of the proposed project (See Chapter 3.9, Hydrology and Water Quality).

Although the project would increase the demand for water service and wastewater treatment services in comparison to the currently vacant site, the demand does not result in the direct need for additional water facilities or direct need for additional wastewater treatment facilities. Furthermore, as an in-fill development, the project does not expand the existing service area of the water and wastewater utilities. Wastewater generation rates for each component of the proposed project are estimated below, based on the currently available information about the proposed project, and SDLAC's standard wastewater loading rates (SDLAC undated):

- **Transit Center and Park and Ride Facility:** The Transit Center and Park & Ride Facility could have a wastewater generation rate anywhere between 3,480 and 7,800 gallons per day (GPD), depending on the specific use of the retail building.[2]
- **Covina Innovation, Technology, and Event Center (iTEC):** The iTEC's wastewater generate rate is anticipated to be variable, considering the use of the event center space will be intermittent. The wastewater generation rate for the iTEC is estimated to range between 2,200 (office use only) and 9,900 GPD (office use with full-capacity event), with the upper end being limited to event days.[3]
- **Residential Townhome Units:** The residential component of the proposed project is anticipated to generate approximately 18,720 GPD.[4]

Therefore, the proposed project's wastewater generation rate is anticipated to be between 24,400 and 36,420 GPD. As a point of comparison, the San Jose Creek WRP, which serves the project area, has a total capacity for 100 *million* GPD of wastewater and a remaining capacity of approximately 34.3 *million* GPD of wastewater. Thus, the upper end of the estimate for the proposed project's wastewater generation rate is a mere 0.1% of the WRP's remaining available capacity. This increase in wastewater generation would, therefore, be minor and would not require or result in the construction (or expansion) of wastewater treatment facilities.

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2 Estimate based on a standard loading rate of 1,000 GPD/1,000 ft^2 for a restaurant or 100 GPD/1,000 ft^2 for a store. The transit center was assumed to be equipped with restrooms; however, SDLAC has no standard loading rate for such a use, so it was conservatively assumed to be equivalent to the wastewater generation rate of a Drive-In Theatre, or 20 GPD/1,000 ft^2.

3 Estimate based on a standard loading rate of 200 GPD/1,000 ft^2 for office uses and 10 GPD/event attendee. It was assumed the event center could accommodate up to 770 people (700 visitors, and 70 employees).

4 Estimate based on a standard loading rate of 156 GPD/dwelling unit.

For both water and wastewater service connections, the City of Covina, Foothill Transit and MLC would be required to pay impact fees (or connection fees) to both the City and the County (SDLAC 2014; City of Covina 2014). These fees must be paid before connection permits are issued. Among other things, these fees are used to fund improvements needed to continue serving the applicable service area, ensure adequate capacity, and comply with State Water Resources Control Board (Division of Drinking Water) and NPDES water treatment requirements.

The proposed project would therefore not—even indirectly—require or result in the construction or expansion of water/wastewater treatment facilities; therefore, the impact, with respect to water or wastewater treatment facilities, would be **less than significant**. No mitigation is required.

C. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The existing conditions of the site currently allow stormwater to either sheet flow or be conveyed in underground storm drains. The proposed project could alter the direction of stormwater runoff on-site in a highly localized way (i.e., a different configuration of roof downspouts, swales, curbs, gutters and underground drains), but would do so in a manner that maintains the general drainage patterns (i.e., continue to direct stormwater runoff to the City's stormwater drainage system within City streets). The total area (i.e., sub-watershed) discharging to the nearest City storm drain would not change. As described under criterion A) above (and Chapter 3.9, Hydrology and Water Quality), the proposed project would require installation of additional BMPs in compliance with the required SUSMP/LID Plan. Implementation of the SUSMP would likely result in a decrease in the peak rate and volume of stormwater runoff entering the City's storm drain system. Therefore the proposed project would not require or result in the construction or expansion of any off-site stormwater drainage facilities.

On-site drainage infrastructure would be constructed in accordance with modern drainage standards as outlined in the regional MS4 Permit and the City of Covina stormwater and runoff pollution control ordinance. The environmental impacts of such features are addressed throughout this EIR as part of the overall footprint/disturbance impacts of the proposed project. Therefore, the proposed project would result in **less than significant** impacts. No mitigation is required.

D. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

ALW is the water provider for the project site and every five years publishes an Urban Water Management Plan (UWMP) that outlines how it will meet the current and future demands of its service area (ALW 2016). Annual water use since 2010 within ALW's service area has ranged from 17,047 acre-feet to 20,832 acre-feet with an average of 20,127 acre-feet (ALW 2016). Based 2014 data in the UWMP, the residential land uses in the City used an average of 0.46 acre-feet of water per connection, and commercial/institutional land uses used an average of 2.58 acre-feet of water per connection (ALW 2016). Given the residential component of the project would consist of 120 townhome units, it can be expected to have a water demand of about 55 acre-feet per year. Assuming each part of the public component of the project would require a separate connection (i.e., event center space, business/technology incubation area, professional office space, and transit center), or four connections, it could have a water demand of about 10 acre-feet per year. Therefore, the total project water demand could be roughly 65 acre-feet per year at build-out, or about 0.3% of ALWs typical demand for its entire service area.

The actual water use associated with the proposed project may differ from the aforementioned estimate, because it is based on an average per-connection demand factor for general land use categories rather than detailed information, to be developed in the final design stages of the project. Recent water use has been trending downward in the City, primarily due to increased awareness of conservation and stricter City ordinances (e.g., Water Waste Prohibition Ordinance, conservation pricing, water-efficient landscape ordinance, etc.) (ALW 2016). The application of modern building codes that require low-flow fixtures and other structural water conservation measures are likely to achieve a substantial per-capita water savings when compared to the average housing stock in ALW's service area. Furthermore, the City's water-efficient landscape ordinance would apply to the project and enforces strict limits on water use through a "maximum applied water allowance" which reflects the area's climate, and limits on the time of day irrigation is allowed. Given water demands factors are based on average conditions across ALW's water service area when compared to the water-efficient nature of new construction, the estimated water demand of 65 acre-feet per year for the proposed project is likely to be a maximum, i.e., an overestimate. This water demand represents approximately 0.3% of ALWs supply, given ALW supplies approximately 19,615 acre-feet per year (afy) of water to its service area.

The UWMP indicates that ALW expects to meet future demands through 2040 for all climatologic classifications, and with regional growth assumptions (ALW 2016). The

project would involve an increase in water demand compared to current conditions (vacant K-Mart); however, it would not affect the validity of water demand projections or the effectiveness water supply reliability and drought contingency plans as presented in ALW's UWMP. The zone change associated with the project would have an immaterial impact on the water demand projections for ALW's entire service area, and is accounted for in ALW's general growth projections. As stated in the UWMP, "although redevelopment is expected to be an ongoing process, it is not expected to significantly impact water use since ALW is already in a near 'built-out' condition" (ALW 2016).

Ultimately, ALW is responsible for proper management of its water system and meeting demand within its service area. Service connection fees paid by the Project Applicant would be used, at least in part, to support ALW's regulatory obligations to manage water demands and plan for future supplies within its service area. As part of the application package for a Tentative Tract Map (subdivision) and Site Plan Review, the City requires project applicants to provide "will-serve" letters from applicable utilities indicating their intent and ability to supply the project with water as a condition of approval.

For these reasons, the project would have sufficient water supplies available from existing entitlements and resources, and the impact would be **less than significant**. No mitigation is required.

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

The existing infrastructure along North Citrus Avenue would be able to accommodate the proposed project wastewater discharges. Wastewater from the project site will be treated at one of the facilities operated by SDLAC. As indicated under Criterion B, the proposed project's wastewater generation rate is a mere 0.1% of the San Jose WRP's remaining available capacity. The SDLAC has established the Will Serve Program to provide information on available trunk sewer and treatment plant capacities for proposed development projects within the Sanitation Districts' service area. As part of the application process for a Tentative Tract Map (subdivision) and Site Plan Review, the City requires project applicants to provide "will-serve" letters from applicable utilities indicating their intent and ability to supply the project with wastewater service as a condition of approval.. As such, impacts are considered to be **less than significant**. No mitigation is required.

F. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs

Demolition activities for the existing K-Mart and private school structures are likely to produce substantial quantities of debris that would need to be disposed of. The City's Construction and Demolition (C&D) Diversion Program requires as a condition of demolition and building permits that 75% of all building and demolition materials be recycled. The City maintains an exclusive franchise agreement with Athens Services doing business as (dba) Covina Disposal to carry out the C&D Diversion Program for construction contractors (City of Covina 2016b). The City's requirement of a 75% construction waste diversion rate would substantially reduce solid waste associated with the proposed project's C&D activities. Further, any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining 25% of C&D material would either be recycled or disposed of at a solid waste facility with available capacity.

Solid waste produced on a regular basis during operation and maintenance of the proposed project would be collected and disposed of by Athens Services. Athens Services is a waste management company that serves several cities in the region. Athens is a mixed-waste processor that can process 5,000 tons of mixed material each day. Athens uses regional landfills in Los Angeles County and San Bernardino County to dispose of waste from its collection, transfer and disposal services. For 2016, Los Angeles County landfills have a total yearly surplus capacity of 5,891,813 tons (or about 47% capacity remaining) and San Bernardino County landfills have a total yearly surplus capacity of 7,779,840 tons (or about 80% capacity remaining) (CalRecycle 2016). The landfills in both counties have adequate capacity to accommodate waste disposal needs through 2025 assuming a medium growth rate projection for the region (CalRecycle 2016).

Therefore, it is anticipated that one of the landfills utilized by Athens would have sufficient permitted capacity to accommodate the project's solid waste disposal needs of the proposed project. For these reasons, the impact of C&D activities, as well as project operations, with respect to permitted landfill capacity, would be **less than significant**. No mitigation is required.

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

Waste from the project site would be serviced by Covina Disposal (Athens Services). Waste generated from construction activities (both phases) would be diverted to a recycling facility at a rate of 75%, in accordance with the requirements of the City's

Construction and Demolition Diversion Program. Waste generated during operation of the proposed project would be managed by Covina Disposal. Hazardous waste produced during construction and operation of both phases would be managed and disposed of in compliance with all applicable federal, state, and local laws. Since the project would be required to comply with federal, state and local statutes and regulations related to solid waste during both phases of construction and operation of the proposed project, impacts would be considered **less than significant**. No mitigation is required.

3.17.5 Cumulative Impacts

Projects considered in the cumulative scenario consist of the single-family residential/park project known as the Charter Oak Residential Development Project, located at 800 North Banna Avenue (approximately 1.7 miles southeast of the proposed project site) and the mixed-use (office/retail/residential) project known as the Covina Hassen Development Project, located on three separate sites along North Citrus Avenue, West Orange Street and at the Park Avenue/East San Bernardino Street intersection. All three sites are located approximately 0.6 mile southwest of the project site. For more information about these related projects, please refer to Section 1.2.3 in Chapter 1.0 of this EIR.

The geographic extent for the analysis of cumulative impacts associated with utilities and service systems consists of the service area associated with each utility. The project-specific analysis associated with utilities and service systems is by nature also a cumulative impacts analysis, because it deals with the current and future demands on potable water, wastewater, stormwater, and solid waste facilities and systems in the context of the whole service area. Water and wastewater utility service providers will continue to be responsible for meeting water quality regulations and waste discharge requirements, and continue to be responsible for providing sufficient and reliable service within their respective service areas. The environmental impacts of infrastructure and/or CIP projects necessary to increase capacity or meet NPDES requirements or WDRs on a regional level are assessed pursuant to CEQA by each agency/utility provider that carries such projects out. Projects requiring new or altered connections or services must coordinate with the applicable utility to execute service agreement(s), and if applicable, pay impact fees. Determinations of water sufficiency found in the applicable UWMP (ALW 2016), landfill capacity provided by CalRecycle (2016), and sewer system capacity assurance found in the applicable sewer system management plan (City of Covina (2014) take future growth into consideration. Therefore, the less than significant conclusions reached in Section 3.17.4 are equally applicable in the cumulative context, which includes the Charter Oak Residential Development Project and the Covina Hassen Development Project. Cumulative impacts are considered **less than significant**. No mitigation is required.

3.17.6 Mitigation Measures

No significant utilities and service systems impacts would occur, and therefore, no mitigation measures are required.

3.17.7 Significance After Mitigation

Impacts to utilities and service systems would be **less than significant**.

3.17.8 References

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CHAPTER 4.0
ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an EIR describe a range of reasonable alternatives to a proposed project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant environmental impacts. EIRs are also required to evaluate the comparative merits of the alternatives. This chapter of the EIR describes and evaluates project alternatives and implements the requirements set forth in the CEQA Guidelines for alternatives analysis. This chapter also identifies the Environmentally Superior Project Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

4.1 SELECTION OF ALTERNATIVES

The range of alternatives and methods for selection is governed by CEQA and applicable CEQA case law. As stated in CEQA Guidelines Section 15126.6(a), the lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This chapter includes the range of project alternatives that have been selected by the lead agency (in this case, the City) for examination, as well as its reasoning for selecting these alternatives.

As stated in Section 15126.6(a) of the CEQA Guidelines, there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. This rule is described in Section 15126.6(f) of the CEQA Guidelines and requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. As defined in Section 15126.6(f), the rule of reason limits alternatives analyzed to those that would avoid or substantially lessen one or more of the significant effects of a project. Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other relevant provisions set forth in the CEQA Guidelines state that EIRs do not need to consider every conceivable alternative to a project, nor are they required to consider alternatives that are infeasible. Because the proposed project would not result in any significant and unavoidable effects to the environment, the range of alternatives that was selected for analysis in this EIR includes those that would result in reduced impacts when compared to those of the proposed project, even though those impacts have been identified as less than significant.

4.1.1 Proposed Project

As described above, the project objectives and the significant impacts of a project are key determiners of the alternatives that are initially examined by the lead agency and the alternatives that are ultimately carried forward for detailed analysis in an EIR. To that end, this subsection includes (a) a summary of the proposed project's characteristics to facilitate comparison between

the proposed project and its alternatives, (b) the list of project objectives, and (c) a summary of the project's significant impacts.

Project Summary

The proposed 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. These components are summarized below.

Transit Center and Park & Ride Facility. The Transit Center and Park & Ride facility would be located south of the residential component and north of the Covina iTEC component of the proposed project, consisting of a parking structure, transit-related retail, a bus depot, and electric bus charging stations. The Transit Center and Park & Ride facility component of the proposed project would comprise approximately 2.99 acres of the total 10.66-acre project site. The parking structure would be located adjacent to the proposed residential uses, with ingress along North Citrus Avenue and egress along East Covina Boulevard, and would be approximately three levels tall and would have a footprint of approximately 50,000 square feet. The parking structure would support approximately 350 to 400 parking stalls. Retail uses adjacent to the parking structure would consist of an approximately 4,800-square foot retail building. Bus bays would be located south of the parking structure for bus loading and unloading of passengers and for use during bus layovers. A proposed "Covina Express Line" and the existing local line #281 would stop at the transit center.

Covina Innovation, Technology, and Event Center (iTEC). The iTEC would be situated in the southeastern portion of the project site and would consist of the following uses (square footages are approximate): 10,000 square feet of event center space; 11,000 square feet of business/technology incubation areas that would provide shared workspace for small-scale and start-up businesses, as well as professional office space; and an outdoor plaza/public space area of 20,000 square feet. Additionally, 35,000 square feet of surface parking would be adjacent to the iTEC to the east with 111 spaces allocated for the event center. The iTEC would be a maximum of two stories (up to approximately 35 feet in height). The iTEC component of the proposed project would comprise approximately 1.55 acres of the total 10.66-acre project site.

Residential Townhome Units. The residential component of the proposed project would consist of up to 120 for-sale townhome units, covering roughly 6.12 acres in the northern portion of the project site. Each unit would average approximately 1,900 square feet in size, for a total residential square footage of approximately 228,000 square feet. The three-story residential buildings would be no more than 36 feet in height to the top of the roof (29 feet to the eaves) and configured in a courtyard arrangement allowing interaction between residents. The units are

expected to include small private patios at the ground level to allow for outdoor living. This component of the project would include a private recreation area of approximately 7,400 square feet along the eastern site boundary. The residential component would include two attached garage parking spaces for each unit (up to 240) and approximately .58 on-site guest parking stalls per unit (up to 69), for a total of approximately 300 spaces.

Project Objectives

As described in Section 2.0 of this EIR, the proposed project is a 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 component; MLC Holdings, Inc./Meritage Homes (MLC) would develop the residential townhome component; and Foothill Transit would design, own, and operate the Transit Center and Park & Ride facility. As such, the proposed project objectives include City objectives, Foothill Transit objectives, and objectives of the applicant. (Note: The City is an applicant, along with Foothill Transit and MLC)

The City and Foothill Transit's objectives are as follows:

- Repurpose the project site with a development concept that is innovative, high-quality in design, meets the community's need for public facilities, infrastructure, transportation and transit-related residences.
- Revitalize the project site with a development that creates a regional destination to attract new visitors to Covina, raise the positive image profile of Covina in the region and meet the daily needs of Covina residents and businesses.
- Introduce an innovative use of the property that will have a positive impact upon adjoining commercial properties.
- Close a north/south "transportation gap" that currently exists between the Metro Gold Line, the Covina Metrolink Station, and the Interstate (I-) 10 Freeway.
- Add new high-quality residences that will meet an emerging need for entry-level homeownership opportunities, focused on access to the regional transportation network.

Additionally, Foothill Transit's objectives are also as follows:

- Increase the regional accessibility and mobility of bus patrons within Covina and nearby cities.
- Provide a transit center and parking facility in an area that will satisfy the parking demands for Foothill Transit customers, while decreasing on-street parking along city streets parallel to the proposed transit center location.

- Reduce automobile vehicle miles traveled (VMT) and associated emissions to benefit air quality.
- Include facility design features that minimize environmental impacts on surrounding land uses.

MLC's objectives are as follows:

- Create a mixed-use, transit oriented project in the City of Covina.
- Incorporate a new residential community into an existing core of nearby retail services, restaurants, theatres and transit amenities.
- Minimize the impact to the regional environment through the incorporation of a mixed-use, transit oriented community.
- Provide a dedicated private amenity for residents and guests of the community to enjoy time relaxing with family and friends.
- Provide an opportunity for residents to minimize the use of their cars and reduce the time spent commuting and reallocate that time to spend with family.
- Build homes and deliver the American dream in a sustainable and environmentally friendly manner.

Environmental Impacts of the Proposed Project

As discussed in detail in Section 3.0, Environmental Analysis, the proposed project would not result in significant, unavoidable impacts. Impacts for all environmental categories were determined to be "less than significant with mitigation incorporated," "less than significant," or "no impact."

4.1.2 Alternatives Considered But Rejected

One of the requirements for alternatives analysis that is set forth in the CEQA Guidelines is identification of alternatives that were considered by the lead agency but rejected as infeasible during the scoping process. As stated in Section 15126.6(c) of the CEQA Guidelines, the EIR should briefly explain the reasons underlying this determination. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are:

(i) Failure to meet most of the basic project objectives,

(ii) Infeasibility, or

(iii) Inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6(c)).

Section 15126.6(f)(1) of the CEQA Guidelines states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." However, as stated in this subsection, no one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In accordance with 15126.6(c) of the CEQA Guidelines, alternatives were considered but rejected from further analysis due to one or more of the above reasons. A description of each alternative and the rationale for rejection is provided below.

Alternative Sites

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the project site. As stated in Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered in the EIR. While there are no significant and unavoidable impacts associated with the proposed project, development of the project on another site in the City would not substantially lessen or avoid the impacts of the proposed project. For example, development of the proposed project on an alternate site would result in a similar construction scenario. As such, similar quantities of criteria air pollutants would be emitted during construction of the project, and similar levels of noise would be produced. Due to the generally built-out nature of the City and the presence of a variety of sensitive receptors throughout the City (residential neighborhoods, schools, playgrounds, etc.), it is unlikely that an alternate site would be situated far enough from sensitive receptors to substantially lessen the air quality and noise impacts of the proposed project during construction. As stated in Section 3.1 of this EIR, the areas surrounding the proposed project site are generally characterized by low-rise, low- to medium-intensity residential neighborhoods and commercial centers. Buildings are generally one to three stories in height. As such, it is expected that if an alternative site were developed with the proposed project, similar impacts in the category of aesthetics would result. Similarly, development at an alternate site would not necessarily reduce impacts to transportation and traffic, as such impacts could merely be relocated to other intersections within the City. The project would place similar demands on public services and utilities services, regardless of its location. For these reasons, use of an alternative site would not likely result in a substantial reduction in the impacts of the project, and alternative sites were ultimately rejected from further analysis in the EIR due to failure to meet project objectives and infeasibility.

Infeasibility. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site" (CEQA Guidelines Section 15126.6(f)(1)). Because the City is highly urbanized and is largely built out, obtaining another site of a similar size that is proximal to existing transit corridors, commercial uses, and neighborhoods is not considered feasible. Furthermore, the project site was selected for development of the proposed project due to its location along existing transit routes, near the City's downtown area, near exiting neighborhoods and commercial development, and because it is located within a "transportation gap" that currently exists between the Metro Gold Line, the Covina Metrolink Station, and the I-10 freeway. Relocating the proposed project to another area within the City (for example, away from the downtown area, along a roadway without an existing transit line, or in an area without a mixture of existing residential and commercial uses) could undermine the function, utility, and financial viability of the project.

Failure to Meet Objectives. Many of the project's objectives pertain to its transit-oriented design and its ability to connect existing and proposed transportation facilities. Meeting these objectives is contingent on the project being located in proximity to existing and proposed transportation facilities and within an area containing a mixture of residential and commercial land uses. As such, an alternate site may not give the project the same ability to provide a transit-oriented, mixed-use development in proximity to existing and proposed transportation facilities. For example, one of the project's objectives is to close a north/south "transportation gap" that currently exists between the Metro Gold Line, the Covina Metrolink Station, and the I-10 freeway. The project site is located between these facilities and is situated at the corner of two major roadways within the City, along an existing Foothill Transit line (#281) and proximal to other existing transit lines. While there are numerous properties located between these transportation facilities, the likelihood of acquiring an available property of a similar size that is also proximal to major roadways, transit lines, existing neighborhoods, and existing commercial uses is low. If the project were not located on a site that is situated between and along numerous transportation corridors, it would not meet the objectives for providing a connection between existing transportation facilities, providing access to the regional transportation network for the residents of the proposed townhome units, or increasing the regional accessibility and mobility of bus patrons. Furthermore, if the project were located on a different site, objectives for repurposing the project site with an innovative development concept and revitalizing the project site with development that creates a regional destination would not be met. For these reasons, alternative sites would fail to attain many of the basic project objectives or would attain the objectives to a lesser degree.

4.2 ALTERNATIVES CARRIED FORWARD FOR CONSIDERATION

Pursuant to Section 15126.6 of the CEQA Guidelines, the City selected a reasonable range of alternatives to the project that would feasibly attain most of the basic objectives of the project but

would avoid or substantially lessen one or more of the effects of the project. Each of the selected alternatives is described below. Pursuant to Section 15126.6(d) of the CEQA Guidelines, these descriptions include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives is required to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. While no significant and unavoidable impacts have been identified in association with the proposed project, the five alternatives presented below would all avoid or substantially lessen at least one of the less-than-significant impacts of the proposed project that have been identified in Section 3.0 of this EIR.

4.2.1 Alternative 1 – No Project (Vacant K-Mart Building) Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. As specified in Section 15126.6(e)(3)(B) of the CEQA Guidelines, the no project alternative for a development project consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) further states that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Section 15126.6(e)(2) of the CEQA Guidelines provides guidance related to establishing the existing environmental setting that is used to define the "no project" alternative. As stated in this section, "the 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published… as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Alternative 1 assumes that the environmental conditions of the project site at the time that the Notice of Preparation was released (May 2016) would remain in place. As such, under Alternative 1, the K-Mart building and parking lot would remain vacant and unused and the private school would continue its operations, consistent with May 2016 environmental conditions. However, as stated in Section 15126.6(e)(2) of the CEQA Guidelines, the lead agency is required to examine conditions that are reasonably expected to occur in the foreseeable future if the project were not approved. Because the project site has existing infrastructure to support a commercial use, it is reasonably foreseeable that the project site would support a business similar to K-Mart in the future, if the proposed project were not approved. However, it is also foreseeable that the K-Mart site would continue to remain vacant. As such, both of these reasonably foreseeable "no project" scenarios

have been analyzed herein: Alternative 1 assumes the K-Mart on the project site would remain vacant and the private school would continue to operate while Alternative 2 assumes that the existing on-site K-Mart facilities would be used by a commercial tenant and the private school would continue to operate. (Alternative 2 is described and analyzed in Section 4.2.2, below).

Under Alternative 1, the existing environment on the project site would remain in place. As described in Chapter 2.0 of this EIR, the project site is comprised of a former K-Mart, located at 1162 North Citrus Avenue, and a private school, located at 177 East Covina Boulevard. The former K-Mart store has been closed for approximately two years and is currently a vacant commercial building. The building is approximately 107,980 square feet in size and one story in height. The private school building is approximately 2,400 square feet in size and one story in height. Under Alternative 1, the K-Mart building and associated surface parking lot would remain vacant and unused. The private school would continue its current operations. The proposed Transit Center and Park & Ride facility, iTEC, and residential townhome units would not be constructed.

Ability to Meet Project Objectives

Alternative 1 would not achieve any of the project objectives. It would not repurpose the project site with an innovative development concept, would not revitalize the project site with a development that creates a regional destination, would not introduce an innovative use of the property, and would not close the north/south transportation gap between exiting transportation facilities. It would not help meet a need for entry-level homeownership opportunities, would not provide a transit center and parking facility, and would not increase accessibility for bus patrons. It would fail to incorporate a new residential community into the existing core of nearby commercial services and would fail to introduce a transit-oriented development into the project area.

Comparison of the Effects of Alternative 1 to the Proposed Project

Construction impacts associated with the proposed project would be avoided because no development would occur on the project site under the No Project (Vacant K-Mart Building) Alternative. The existing structures would remain in place. The K-Mart building would remain vacant, and the private school would continue its current operations. Maintenance activities would occur as needed to maintain the existing facilities. No construction-related air quality emissions would occur and no vegetation removal would occur having the potential to disturb nesting birds. No vacant buildings would be demolished having the potential to disturb roosting special-status bat species. The potential for uncovering previously unknown cultural resources would be avoided because excavation would not take place. Impacts associated with the removal of potentially hazardous building materials from the project site would not occur, since no structures would be demolished. No construction noise or construction-related traffic would be generated.

Operational impacts associated with the proposed project would be avoided because no changes to the project site would occur. The height, massing, and lighting of buildings on the project site would remain the same. As such, no aesthetic impact would result. (However, it is noted that the project site is currently an underutilized, vacant site that has a degraded appearance. Under Alternative 1, the generally vacant and degraded appearance of the project site would be maintained and the proposed project's improvements relative to design and landscaping would not occur.) Under Alternative 1, the number of vehicle trips to/from the project site would not be expected to change because the same uses would be operating at the project site (i.e., the private school) in a manner consistent with existing conditions. Thus, no increase in mobile emissions, vehicular noise, or traffic would be expected to occur. Because the land use intensity of the project site would remain the same, the water usage, sewage generation, and need for other public services and utilities would not increase. Unlike the proposed project, Alternative 1 would not implement General Plan policies that pertain to providing better links to transit and mixed uses. However, Alternative 1 would not require a specific plan for the project site to establish consistency between the existing project site uses and land use designations, since the existing uses are in compliance with the exiting land use designations for the project site. As such, land use and planning impacts would be avoided, since the land use of the project site would not change. Alternative 1 would result in decreased environmental impacts relative to the proposed project (see Table 4-1 for a summary of the comparison of the environmental effects of the proposed project to this alternative, as well as the other alternatives presented in this section).

4.2.2 Alternative 2 – No Project (Planned Development) Alternative

The exiting commercial structure on the project site was previously occupied and used by K-Mart. Alternative 2 assumes that a similar commercial tenant would occupy this vacant building and would use the associated surface parking lot. Because the on-site commercial structure has been vacant for several years, it is assumed that the new commercial tenant would make improvements to the project site and to the existing commercial structure. For the purposes of this analysis, improvements are anticipated to consist of re-surfacing the existing surface parking lot, exterior improvements to the existing structure, and interior modifications to the existing structure. The former K-Mart business also included a supplementary automotive service facility, which had approximately 12 service stalls. Depending on the new commercial tenant, renovations could potentially involve removal of the existing hydraulic lift units and underground waste-oil storage tank on the project site that were associated with the previous automotive service facility. The existing landscaping would generally be retained and the K-Mart building would be retained. The private school would also remain in place, and its operation would continue in a manner consistent with existing conditions.

Ability to Meet Project Objectives

Alternative 2 would not achieve any of the project objectives. It would not repurpose the project site with an innovative development concept, would not revitalize the project site with a development that creates a regional destination, would not introduce an innovative use of the property, and would not close the north/south transportation gap between exiting transportation facilities. It would not help meet the need for entry-level homeownership opportunities, would not provide a transit center and parking facility, and would not increase the accessibility for bus patrons. It would fail to incorporate a new residential community into an existing core of nearby commercial services and would fail to introduce a transit-oriented development into the area.

Comparison of the Effects of Alternative 2 to the Proposed Project

Construction activities for Alternative 2 would be minor relative to the construction activities that would be required for the proposed project. The construction activities for Alternative 2 would require fewer truck trips, fewer construction workers, less construction waste, and a shorter duration of construction when compared to the proposed project. Less ground disturbance would be required, since the existing on-site buildings and landscaping would remain in place. As such, construction-related impacts would generally decrease when compared to the proposed project.

Operation would involve additional vehicular trips to and from the project site, since the new commercial tenant would require employees and would result in customers traveling to and from the project site. These vehicular trips would be associated with off-site traffic noise, air emissions, and greenhouse gas emissions that would represent an increase over the baseline conditions of the project site. However, the number of trips associated with a new commercial tenant is anticipated to be less than those caused by the proposed project, which includes residential, commercial, and transit uses. The new commercial tenant would also cause an increase in on-site noise sources relative to existing conditions due to the presence of additional people on the project site and the need for stationary noise sources, such as HVAC equipment.

Aesthetics

Alternative 2 would not result in substantial changes in the appearance of the project site. The height, massing, and lighting of buildings on the project site would remain the same. While the exterior of the K-Mart structure may be renovated (i.e., new paint and/or signage), these alterations would not significantly alter the character or quality of the project site. While additional lighting sources may be added to the project site to support an operational business, the intensity and distribution of light sources throughout the project site is expected to be less than that of the proposed project, since the overall intensity of development and size of structures would be reduced when compared to the proposed project. Further, the two-story iTEC building and three-level parking garage that are part of

the proposed project would not be developed under Alternative 2. Overall aesthetic impacts would be reduced when compared to the proposed project.

Agriculture and Forestry Resources

Impacts would be the same as the proposed project; the operation of a new commercial use on the project site would not affect any agriculture or forestry resources.

Air Quality

While some construction activities would occur under Alternative 2, they would be minimal compared to those of the proposed project, since the existing buildings would be left in place and no new structures would be built. As such, while some construction-related air quality emissions would result, they would be reduced when compared to the proposed project.

Operational activities that would result in emission of air pollutants would also occur under Alternative 2. However, as with construction, it is anticipated that the operational emissions would be lower than those of the proposed project. Under Alternative 2, the existing private school would continue to operate on the project site, and a new commercial use would begin operation at the vacant K-Mart building, resulting in increased activities on the project site including vehicular trips. However, Alternative 2 involves fewer land uses and an overall decrease in land use intensity on the project site relative to the proposed project. Operation of the proposed project would involve 120 residential units, a transit center and park & ride facility, a new bus line (the Covina Express Line), a community event center, and offices. As such, operation of Alternative 2 would represent a decrease in operational air quality emissions relative to the proposed project.

Biological Resources

Alternative 2 would not involve removal of existing vegetation and the intensity of construction would be reduced when compared to the proposed project. As such, potential effects to nesting migratory birds and special-status bats would be reduced when compared with the proposed project.

Cultural Resources

Ground disturbance under Alternative 2 would generally be limited to re-surfacing the existing parking lot and potentially removing the existing hydraulic lift units and underground waste-oil storage tank. While the likelihood of uncovering previously unknown cultural resources would be reduced under Alternative 2, the potential for an unanticipated find would still exist during the limited ground disturbance that could occur. As with the proposed project, mitigation measures **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3** would still apply to Alternative 2 and would reduce impacts

to below a level of significance. Overall, however, impacts to cultural resources would be reduced when compared to the proposed project, since less ground disturbance would occur.

Geology and Soils

Alternative 2 would result in reduced impacts in the category of geology and soils, when compared to the proposed project. The existing buildings on the project site would remain in place, and fewer people would be present on the project site, thereby decreasing the potential for people on the project site to be exposed to geological hazards, in the event that such a hazard were to occur on the project site.

Greenhouse Gas Emissions

Similar to air quality impacts, the greenhouse gas emission impacts of Alternative 2 would be less than those of the proposed project, since the land use intensity of the project site would decrease relative to the proposed project.

Hazards and Hazardous Materials

Because interior modifications would be involved for Alternative 2 and because the existing hydraulic lift units and underground waste-oil storage tank may be removed, Alternative 2 would result in similar impacts as the proposed project in the category of hazards and hazardous materials. However, as with the proposed project, **MM-HAZ-1** through **MM-HAZ-3** would be incorporated and would reduce such impacts below a level of significance.

Hydrology and Water Quality

While some construction activities would occur under Alternative 2, they would be minimal compared with those of the proposed project, since the existing buildings would be left in place and no new structures would be built. As such, construction effects to hydrology and water quality would be reduced when compared with the proposed project. Operational impacts would be similar to those of the proposed project since the project site would be generally impervious under both Alternative 2 and the proposed project.

Land Use and Planning

Unlike the proposed project, Alternative 2 would not implement General Plan policies that pertain to providing better links to transit and mixed uses. However, Alternative 2 would not require a specific plan for the project site to establish consistency between the existing project site uses and land use designations, since the existing uses are in compliance with the exiting land use designations for the project site. As such, land use and planning impacts would be avoided, since the land use of the project site would not change.

Mineral Resources

Impacts would be the same as the proposed project; the operation of a new commercial use on the project site would not affect mineral resources.

Noise

While some construction activities would occur under Alternative 2, they would be minimal compared with those of the proposed project, since the existing buildings would be left in place and no new structures would be built. As such, noise impacts during construction would be reduced when compared to the proposed project. During operation, the land use intensity of the project site would be reduced when compared to the proposed project. As such, fewer vehicles would access the project site, and fewer people would be present on the project site. Further, fewer on-site stationary noise sources would result. As such, operational noise impacts during operation would also be reduced when compared with the proposed project.

Population and Housing

Impacts would be reduced relative to the proposed project, since Alternative 2 would not involve the development of any residential structures, which directly cause population growth. The employment growth that would be caused by reintroducing a commercial use to the project site under Alternative 2 would have the potential to cause some population growth; however it is expected that the employees of the new commercial use would be drawn from the existing pool of potential employees within the highly populated San Gabriel Valley and greater Los Angeles metropolitan area. As such, Alternative 2 would result in reduced impacts when compared to the proposed project.

Public Services

As described in the paragraph above, Alternative 2 would result in less population growth (if any) when compared to the proposed project. Similarly, it would result in reduced land use intensity on the project site when compared to the proposed project. As such, while demands for public services may slightly increase under Alternative 2 relative to existing conditions, they would increase to a lesser extent when compared to the proposed project. As such, impacts would be reduced.

Recreation

Similar to public services, while Alternative 2 may slightly increase the use of recreational facilities in the City, it would do so to a lesser extent than the proposed project, since it does not involve residential development and involves land uses of lesser intensity. However, Alternative

2 would not include development of the on-site recreational amenities that are part of the proposed project, which consist primarily of an outdoor plaza/public space that would be part of the iTEC and a private recreational area for the residential uses. While these proposed amenities would help alleviate the proposed project's demands on nearby recreational facilities, Alternative 2 would still entail reduced impacts when compared to those of the proposed project, since it would not involve residential development and would have an overall reduced land use intensity.

Transportation and Traffic

While some construction activities would occur under Alternative 2, they would be minimal when compared to those of the proposed project, since the existing buildings would be left in place and no new structures would be built. As such, the construction scenario for Alternative 2 would involve fewer truck trips and construction worker trips when compared to those required for the proposed project. During operation, the number of trips is also expected to be less than those associated with the proposed project, since Alternative 2 would result in a reduced land use intensity when compared to the proposed project. Conversely, the aspects of the proposed project that would develop and support use of alternative transportation modes would not be developed under Alternative 2. However, due to the overall reduction in vehicular trips, Alternative 2 is considered to have reduced impacts when compared to the proposed project.

Utilities and Service Systems

Under Alternative 2, impacts to utilities and service systems would be reduced when compared to the proposed project. While a new commercial use on the project site would require utilities and would place demands on service systems, the overall land use intensity of the project site would be less than the land use intensity that would be implemented under the proposed project. As such, it is anticipated that water use, wastewater generation, and solid waste generation would be slightly less when compared to the proposed project. Stormwater runoff volumes and pollutants would be generally similar under Alternative 2, since the project site would remain primarily impervious. However, overall impacts to utilities and service systems are considered to be slightly reduced under Alternative 2 when compared to the proposed project, due to the overall comparative decrease in land use intensity.

4.2.3 Alternative 3 – Corner Parcel Acquisition Alternative

The City does not currently control the lot that is located on the northeast corner of Covina Boulevard and Citrus Avenue. (This lot is currently occupied by a strip mall of approximately 21,719 square feet). As such, the proposed project does not include any development on this lot. However, Alternative 3 assumes that the City would successfully acquire this corner lot and would develop it as part of the proposed project. The configuration of the iTEC would be slightly modified to account for the incorporation of the corner lot into the project site. (Development of

the residential townhomes and Transit Center and Park & Ride Facility would be the same as the proposed project.) 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 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 in height. All other components of the iTEC would remain the same as the proposed project (there would be an outdoor plaza/public space area of 20,000 square feet and 35,000 square feet of surface parking would surround the iTEC to the south, east, and north with 111 spaces allocated for the event center). As with the proposed project, the iTEC components would comprise approximately 1.55 acres of the total 10.66-acre project site.

Ability to Meet Project Objectives

Alternative 3 is identical to the proposed project, with the exception that the proposed iTEC building would be divided into two separate buildings. However, the iTEC awould have the same total square footage as the iTEC that would be constructed under the proposed project, and it would have the same function (i.e., an event center and professional office/business incubation space). As such, Alternative 3 would meet all the project objectives. The minor alteration in the configuration of the iTEC under Alternative 3 would not reduce the ability to meet any of the project objectives.

Comparison of the Effects of Alternative 3 to the Proposed Project

The key difference between Alternative 3 and the proposed project is the configuration of the iTEC and the height of the iTEC. Under Alternative 3, the uses contained within the iTEC would be distributed amongst two separate buildings: an event center and an office building containing both professional office space and business incubation space. The iTEC that would be developed as part of the proposed project would be two stories in height, while the buildings comprising the iTEC under Alternative 3 would be one story (approximately 25 to 28 feet) in height. The iTEC buildings proposed under Alternative 3 would be reduced in height compared to the proposed project. While the proposed two-story iTEC building would be compatible with existing development in the project area and would not substantially obstruct any scenic vistas, developing single-story iTEC buildings would reduce impacts in the category of aesthetics when compared to the proposed project. The existing development in the project area consists of low-rise buildings that are generally one to three stories in height. The single-story iTEC buildings would be less visually prominent, as they would be on the low end of the range of typical building heights in the project area. Additionally, the single-story iTEC

buildings could reduce the degree to which the proposed project would obstruct views of the San Gabriel Mountains. As such, Alternative 3 would reduce impacts that were identified for the proposed project relative to aesthetics.

Aside from the reconfiguration of the iTEC building and reduction in the proposed project's aesthetic impact, all other project components and resulting environmental impacts for Alternative 3 would be the same as those that have been identified for the proposed project throughout Section 3.0 of this EIR. The same impact determinations would apply and the same mitigation measures would be applied that are described throughout Section 3.0 of this EIR (see Table 4-1 for a summary of the comparison of the environmental effects of the project to this alternative).

4.2.4 Alternative 4 – Reduced iTEC Alternative

Under this alternative, the size of the proposed iTEC building would be reduced to 12,000 square feet from the proposed project's size of 21,000 square feet. The reduced iTEC and would be one story (approximately 25 to 28 feet) in height and would accommodate an event center and business incubator space. No professional office space would be provided within the iTEC. All other components of the iTEC would remain the same (there would be an outdoor plaza/public space area of 20,000 square feet and 35,000 square feet of surface parking would surround the iTEC to the south, east, and north with 111 spaces allocated for the event center). The corner lot that would become part of the project site under Alternative 3 would not be part of the project. The residential and transit portions of the project would remain the same as the proposed project.

Ability to Meet Project Objectives

Alternative 4 is generally identical to the proposed project, with the exception of reduced square footage for the iTEC building from 21,000 square feet under the proposed project to 12,000 square feet (a reduction of approximately 9,000 square feet). Additionally, no professional office space would be provided in the iTEC building that would be developed under Alternative 4. This change would not substantially affect the extent to which Alternative 4 would meet the project objectives. For example, reducing the iTEC by 9,000 square feet would not substantially reduce the extent to which the project would revitalize and repurpose the project site with an innovative development that would raise the positive image profile of Covina. Additionally, changes to the iTEC would not change the extent to which Alternative 4 would meet objectives pertaining to development of transit and residential uses. Elimination of the proposed professional office space from the proposed iTEC may slightly reduce the extent to which Alternative 4 would meet the needs of Covina businesses. However, the iTEC would still provide business incubation space and would support overall economic growth in the area. As such, most of the basic project objectives would be met by Alternative 4.

Comparison of the Effects of Alternative 4 to the Proposed Project

The key difference between Alternative 4 and the proposed project is the height and size of the iTEC. The iTEC that would be developed under the proposed project would be 35 feet in height, while the iTEC that would be developed under Alternative 4 would be one story (approximately 25 to 28 feet) in height. The iTEC building proposed under Alternative 4 would be reduced in height relative to the proposed project. While the proposed 35-foot iTEC building would be compatible with existing development in the project area and would not substantially obstruct any scenic vistas, the one story (approximately 25 to 28 feet) iTEC building that would be developed under Alternative 4 would reduce impacts in the category of aesthetics when compared to the proposed project. The existing development in the project area consists of low-rise buildings that are generally one to three stories in height. An iTEC building of a reduced height would be less visually prominent and could reduce the degree to which the proposed project would obstruct views of the San Gabriel Mountains. As such, Alternative 4 would reduce impacts that were identified for the proposed project relative to aesthetics.

A reduction in the size of the iTEC building by 9,000 square feet as compared with the proposed project could slightly reduce construction and operational impacts, when compared to the proposed project. For example, the slightly smaller iTEC would require fewer construction workers and would require a shorter construction duration than the larger iTEC that would be developed under the proposed project. The reduced iTEC would also result in a slight reduction in vehicular trips and general activity on the project site during project operation. As such, air quality impacts, noise impacts, and traffic and transportation impacts would be slightly reduced when compared with the proposed project. However, the same mitigation measures identified for air quality and noise in Section 3.0 of this EIR would still be required, since a slight reduction in the square footage of the iTEC would not eliminate the need for mitigation measures in these categories.

For all other impact categories, the elimination of 9,000 square feet of floor area from the proposed iTEC would not change the construction or operational scenarios of the project to the extent that the impacts identified for the proposed project in Section 3.0 of this EIR would be avoided, reduced, or increased. As such, all other environmental impacts for Alternative 4 would be the same as those that have been identified for the proposed project. The same impact determinations would apply, and the same mitigation measures would be applied to Alternative 4 as those that are described throughout Section 3.0 of this EIR.

4.2.5 Alternative 5 – Reduced iTEC with Senior Center Alternative

Under this alternative, the size of the proposed iTEC building would be reduced to 15,000 square feet from the proposed project's size of 21,000 square feet. The iTEC building would be one story (approximately 25 to 28 feet) in height. The office space area would no longer be part of

the iTEC. Instead, the iTEC would accommodate an event center and a senior center. All other components of the iTEC would remain the same (there would be an outdoor plaza/public space area of 20,000 square feet and 35,000 square feet of surface parking would surround the iTEC to the south, east, and north with 111 spaces allocated for the event center). The corner lot that would become part of the project site under Alternative 3 would not be part of the project. The residential and transit portions of the project would remain the same as the proposed project.

Ability to Meet Project Objectives

Alternative 5 is generally identical to the proposed project, with the exception of reduced square footage for the iTEC building from 21,000 square feet under the proposed project to 15,000 square feet (a reduction of approximately 6,000 square feet). Additionally, no professional office space or business incubation space would be provided in the iTEC building that would be developed under Alternative 5. Instead, a senior center would be provided within the iTEC, along with the event center space. This change would not substantially affect the extent to which Alternative 5 would meet the project objectives. For example, reducing the iTEC by 6,000 square feet and eliminating the office component would not substantially affect the extent to which the project would revitalize and repurpose the project site with an innovative development that would raise the positive image profile of Covina. Additionally, the iTEC that is proposed under Alternative 5 would not change the extent to which this alternative would meet objectives pertaining to development of transit and residential uses. Elimination of the proposed office space and business incubation space from the proposed iTEC may slightly reduce the extent to which Alternative 5 would meet the needs of Covina businesses. However, the iTEC would still support overall economic growth in the area. As such, most of the basic project objectives would be met by Alternative 5.

Comparison of the Effects of Alternative 5 to the Proposed Project

The key difference between Alternative 5 and the proposed project is the height and size of the iTEC. The iTEC that would be developed under the proposed project would be 35 feet in height, while the iTEC that would be developed under Alternative 5 would be one story (approximately 25 to 28 feet) in height. The iTEC building proposed under Alternative 5 would be reduced in height when compared to the proposed project. While the proposed 35-foot iTEC building would be compatible with existing development in the project area and would not substantially obstruct any scenic vistas, the one-story (approximately 25 to 28 feet tall) iTEC building that would be developed under Alternative 5 would reduce impacts in the category aesthetics when compared to the proposed project. The existing development in the project area consists of low-rise buildings that are generally one to three stories in height. An iTEC building of a reduced height would be less visually prominent and could reduce the degree to which the proposed project would obstruct

views of the San Gabriel Mountains. As such, Alternative 5 would reduce impacts that were identified for the proposed project relative to aesthetics.

A reduction in the size of the iTEC building by 6,000 square feet as compared with the proposed project could slightly reduce the construction and operational impacts of Alternative 5, when compared to the proposed project. For example, the slightly smaller iTEC would require fewer construction workers and would require a shorter construction duration than the larger iTEC that would be developed under the proposed project. It would also result in a slight reduction in vehicular trips and in general activity on the project site during operation. As such, air quality impacts, noise impacts, and traffic and transportation impacts would be slightly reduced when compared with the proposed project. The same mitigation measures identified for air quality and noise in Section 3.0 of this EIR would still be required, since a slight reduction in the square footage of the iTEC would not eliminate the requirement for mitigation in these categories.

For all other impact categories aside from aesthetics, air quality, noise, and traffic, the elimination of 6,000 square feet of floor area from the proposed iTEC would not change the construction or operational scenarios of the project to the extent that the impacts identified for the proposed project in Chapter 3.0 of this EIR would be avoided, reduced, or increased. As such, all other environmental impacts for Alternative 5 would be the same as those that have been identified for the proposed project. The same impact determinations would apply, and the same mitigation measures would be applied to Alternative 5 that are described throughout Section 3.0 of this EIR.

4.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

A comparative summary of the environmental impacts associated with each alternative is provided in Table 4-1. As shown, Alternative 1, the No Project (Vacant K-Mart Building) Alternative, would be the environmentally superior alternative, as it would result in no new environmental impacts and would avoid the proposed project's impacts. Alternative 2, the No Project (Planned Development) Alternative, would also reduce many of the impacts identified for the proposed project. Neither Alternative 1 nor Alternative 2 would attain the basic objectives of the project.

Alternative 3, the Corner Parcel Acquisition Alternative, would generally be identical to the proposed project in terms of environmental impacts, with the exception of impacts to visual

character, which would be reduced. If the City were to acquire the parcel located at the northeast corner of East Covina Boulevard and North Citrus Avenue, the iTEC could be developed as proposed with a reduced height, since a portion of the iTEC could be developed on the corner parcel that is not currently part of the proposed project site. This reduction in height would reduce the aesthetic impact of the proposed project. Alternative 3 would meet all the project objectives.

Alternative 4 and Alternative 5 would reduce the impacts of the proposed project in the categories of aesthetics, air quality, noise, and traffic. Alternative 4 would result in slightly greater reductions in these categories when compared to Alternative 5. This is because Alternative 4 would result in an iTEC building of a slightly smaller size than the iTEC building that is proposed under Alternative 5. Alternative 4 would generally meet the project objectives, although not to the same extent as Alternative 3, since Alternative 4 would reduce the amount of office space that would be available on the project site, thereby reducing the ability of the project to meet the needs of Covina businesses. Alternative 5 would also meet the basic project objectives but to a lesser extent than Alternative 4, since it would involve complete removal of the office space component from the proposed project. While Alternative 5 would still foster economic growth, it would not support business incubation space or professional office space, thereby diminishing the extent to which the project meets the needs of Covina businesses.

Aside from the "no project" alternatives, Alternative 4 would result in the greatest reduction in environmental impacts among the remaining alternatives, when compared to the proposed project. Additionally, Alternative 4 meets the basic project objectives. For these reasons, Alternative 4 would be the environmentally superior alternative.

Table 4-1
Comparison of Impacts

Impact Area	Proposed Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Aesthetics	Less than significant with incorporation of mitigation measures	Impacts avoided	Impacts reduced	Impacts reduced	Impacts reduced	Impacts reduced
Agriculture and Forestry Resources	No impact	Same as proposed project	Same as proposed project	Same as proposed project	Same as proposed project	Same as proposed project
Air Quality	Less than significant with incorporation of mitigation measures	Impacts avoided	Impacts reduced	Same as proposed project	Impacts reduced	Impacts reduced

Table 4-1
Comparison of Impacts

Impact Area	Proposed Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Biological Resources	Less than significant with incorporation of mitigation measures	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Cultural Resources	Less than significant with incorporation of mitigation measures	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Geology and Soils	Less than significant with incorporation of mitigation measures	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Greenhouse Gas Emissions	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Hazards and Hazardous Materials	Less than significant with incorporation of mitigation measures	Impacts avoided	Similar to proposed project	Same as proposed project	Same as proposed project	Same as proposed project
Hydrology and Water Quality	Less than significant	Impacts avoided	Impacts reduced during construction; impacts similar during operation	Same as proposed project	Same as proposed project	Same as proposed project
Land Use and Planning	Less than significant	Impacts avoided	Impacts avoided	Same as proposed project	Same as proposed project	Same as proposed project
Mineral Resources	No impact	Same as proposed project	Same as proposed project	Same as proposed project	Same as proposed project	Same as proposed project
Noise	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Impacts reduced	Same as proposed project
Population and Housing	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Public Services	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Recreation	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project

Table 4-1
Comparison of Impacts

Impact Area	Proposed Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Traffic	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Impacts reduced	Impacts reduced
Utilities and Service Systems	Less than significant	Impacts avoided	Impacts reduced	Same as proposed project	Same as proposed project	Same as proposed project
Meets Most of the Basic Project Objectives?	Yes	No	No	Yes	Yes	Yes

SOURCE: Gonzalez Goodale Architects, 2016

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FIGURE 4-1

Alternative 3 - Conceptual Site Plan

Covina Transit-Oriented Mixed-Use Development Project EIR

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CHAPTER 5.0
OTHER CEQA REQUIREMENTS

5.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

This section is prepared in accordance with Section 15126.2(b) of the CEQA Guidelines, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated, but cannot be reduced to a less than significant level. An analysis of environmental impacts caused by the proposed project has been conducted and is contained in this EIR. Seventeen issue areas were analyzed in detail in Chapter 3.0. According to the environmental impact analysis presented in Chapter 3.0, the proposed project would not result in significant and unavoidable adverse impacts.

5.2 EFFECTS NOT FOUND TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires a statement that briefly indicates the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. As stated in the CEQA Guidelines, such a statement may be contained in an attached copy of an Initial Study. An Initial Study was not prepared for the proposed project. As described and substantiated in Chapter 3.0 of this EIR, all seventeen CEQA issue areas were not found to be significant.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations will not be able to reverse. Nonrenewable resources that would be used on-site during construction and operation include natural gas, other fossil fuels, water, concrete, steel, and lumber. The proposed project would result in the commitment of such resources.

Electricity is provided to the project site by Southern California Edison (SCE). SCE serves approximately 180 cities in 11 counties across Central and Southern California. SCE's electrical energy generation sources include natural gas, coal, nuclear, renewable energy (geothermal, small hydroelectric, solar, and wind), and large hydroelectric facilities. The Southern California Gas Company provides the City with natural gas service. The company's service territory encompasses approximately 20,000 square miles and more than 500 communities. Water service for the proposed project would be served by Azusa Light & Water (ALW). ALW's service area encompasses about 14.2 square miles in the San Gabriel Valley including a portion of five cities and portions of unincorporated Los Angeles County. The water service area includes the City of Azusa and portions of the cities of Glendora, Covina, West Covina, Irwindale, and

unincorporated Los Angeles County (ALW 2016). ALW's water supplies come from a combination of imported water from the Metropolitan Water District (which imports water from the Colorado River and the Sacramento-San Joaquin Bay Delta), groundwater from 11 municipal water wells, and local surface water (diversions from the San Gabriel River and the Morris Reservoir) (ALW 2016). Normally groundwater and local surface water diversions are sufficient to supply the service area, but ALW has the ability to import water from MWD in emergency situations (ALW 2016). On average, ALW supplies 19,615 acre-feet per year (afy) of water to its service area, with 12,993 afy (or 66%) of it from groundwater, and 6,622 afy (or 34%) of it from local surface water (ALW 2016). These entities that supply the project site with resources are subject to a variety of policies that require reductions in resource usage and/or reductions in emissions. Examples include the California Renewables Portfolio Standard, AB 939, SB 1374, and the requirement to prepare Urban Water Management Plans.

In December 2012, the City of Covina adopted an Energy Acton Plan (EAP). The EAP was created in partnership with the San Gabriel Valley Council of Governments and SCE, and was prepared to follow the guidance of California's Long Term Energy Efficiency Strategic Plan. The EAP identifies a comprehensive set of electricity-related energy efficiency targets, goals, policies, and actions to help the community and the City become more energy-efficient, and provides policies and actions to assist with the implementation of energy efficiency strategy, and summarizes the policies, benefits, implementation time frame, and responsible departments for implementing the components of the energy efficiency strategy. The EAP contains a comprehensive GHG emissions inventory and forecast, and provides recommendations for community-wide strategies and municipal programs to achieve cost savings through energy reductions and more efficient maintenance and operational practices; however, the EAP's analysis was limited to energy and gas consumption (City facilities and community-wide). The EAP serves as the equivalent of an electricity efficiency chapter of a climate action plan and is designed to integrate into a comprehensive climate action plan when the City's resources support the preparation of a climate action plan to address the reduction of GHG emissions from electricity, natural gas, waste, transportation, and other sectors (City of Covina 2012). The EAP's energy reduction targets will set the groundwork for any GHG reduction targets found in a future climate action plan. Furthermore, the City's General Plan includes the Natural Resources Element Policy Area 1 - Water Resources and Air Quality policies as part of the Land Use Element. Thes policies outlined in this section ensure water conservation measures are implemented as part of project's proposed in the City.

The EAP is currently in place within the City and applies to the proposed project and other development that occurs within the City. Additionally, the City's Construction and Demolition (C&D) Diversion Program requires as a condition of demolition and building permits that 75% of all building and demolition materials be recycled, which would reduce the amount of waste that would be generated during the construction process for the proposed project and would help

ensure that construction waste is reused and that additions to area landfills are minimized. The project's sustainable design features are summarized in Chapter 2.0, Project Description, and are further detailed in Appendix B. The proposed transit-oriented mixe-use project would implement many green building features. The parking structure proposed as part of the Transit Center will include provisions for electric bus charging stations, electric vehicle charging stations, photovoltaic canopies on the roof, and energy-efficient lighting. The Covina iTEC component of the proposed project will include rooftop solar panels and use LED lighting fixtures. Additionally, the structures will be constructed to comply with green building codes. Plumbing fixtures will include low-flow toilets, automatic cut-off water faucets, and air blade hand dryers. Landscaping will consist of drought-tolerant/native California plants, mulch groundcover, drip irrigation, moisture sensors, and the construction of bio-swales infiltration systems. Hardscaping will use pavers in plaza areas and within the surface parking lots. There would also be at least one electric vehicle charging station in the surface parking lot. The residential component of the proposed project will surpass ENERGY STAR certification standards. Sustainable building materials and components such as spray-foam insulation, Low-E2 or Low-E3 vinyl windows, energy-efficient heating, ventilation and air conditioning (HVAC) units, weather-sensing irrigation, water-efficient faucets, and compact fluorescent lighting fixtures will be included in each unit and the overall residential structure.The proposed project would incorporate an environmentally sustainable design using green building technologies as identified in the principles for energy efficiency, water conservation, environmentally preferable building materials, and overall waste reduction.

As described above, the utilities that service the City, the City itself, and the design of the proposed project are all subject to regulations that are working to reduce the amount of nonrenewable resources that are committed to development projects. Additionally, the proposed project has incorporated voluntary sustainable design factors to go beyond the requirements. As such, the proposed project is not anticipated to consume substantial amounts of energy in a wasteful manner, and it would not result in significant impacts from consumption of utilities. Although irreversible environmental changes would result from the proposed project, such changes would not be considered significant.

5.4 GROWTH-INDUCING IMPACTS

According to Section 15126.2(d) of the CEQA Guidelines, growth-inducing impacts of the proposed project shall be discussed in the EIR. Growth-inducing impacts are those effects of the proposed project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of the proposed project. Typically, the growth-inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. However, the creation of growth-inducing potential does not automatically lead to growth, whether it would be below or in exceedance of a projected level.

The environmental effects of induced growth are secondary or indirect impacts of the proposed project. Secondary effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community or public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses. The Population and Housing section of the EIR discusses the potential growth inducement of the proposed project (Section 3.13). The construction of the proposed project would have the potential to attract more people and increase the population in the area due to the additional 120 townhome units. However, construction of the proposed project is intended to update the existing site and accommodate affordable housing, not necessarily introduce or accommodate growth. Based on the California DOF 2016 average household size estimates for the City of Covina, there are approximately 3.06 persons—rounded to 3—per household (DOF 2016). While the proposed project is intended to accommodate existing projected population growth, if consideration is given to unit growth, the proposed project would result in an additional 120 units. Therefore, at full build-out the proposed project is estimated to provide housing for up to approximately 360 residents. An increase of 360 people would only be 0.7% of the forecasted population of Covina in 2020 (48,800 as per the Southern California Association of Governments (SCAG)). The addition of 360 people to the City would not exceed population projections and is not considered a substantial increase.

The revitalization of the proposed project site would not result in substantial population growth or exceed local population projections.

The proposed project would provide additional employment on the project site. However, the number of new jobs would be within employment growth projections that have been calculated by the SCAG. It is anticipated that most of the jobs associated with the proposed project would be filled by existing City residents or by residents of neighboring cities in the densely populated Los Angeles metropolitan area. Therefore, it is not anticipated that the employment generated by the proposed project would lead to a substantial influx of residents to the City. Due to the ability of the existing regional population to provide an ample employment pool within proximity to the project site and due to the minor increase in employment relative to total jobs available in the City, the proposed project would not generate substantial population growth. As such, the

growth-inducing impacts of the project, if any, would be minor. As such, the proposed project would not result in significant adverse secondary effects related to induced growth.

5.5 REFERENCES

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