PUBLIC REVIEW DRAFT

Initial Study/Mitigated Negative Declaration

1270 Garvey Street Digital Billboard Project

FEBRUARY 2024

Prepared for:

CITY OF COVINA
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BACT	Best Achievable Control Technology
Basin Plan	Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties
bgs	below the ground surface
BMP	best management practice
BPC	Business and Professions Code
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalGEM	California Geologic Energy Management Division
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CA-WET	California Waste Extraction Test
CCR	California Code of Regulations
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of Covina
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
C-P	Administrative and Professional Office zone
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
dB	decibels
dBA	A-weighted decibels
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EAP	Energy Action Plan
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
GC	General Commercial zone
GHG	greenhouse gas
GWP	global warming potential
HAZWOPER	Hazardous Waste Operations and Emergency Response

Acronym/Abbreviation	Definition
HVAC	heating, ventilation, and air conditioning
I	Interstate
IES	Illuminating Engineering Society
kWh	kilowatt hours
LACM	Natural History Museum of Los Angeles County
LCFS	Low Carbon Fuel Standard
L_{dn}	day–night average noise level
LED	light-emitting diode
L_{eq}	equivalent noise level over a given period
LST	localized significance threshold
LZ	Lighting Zone
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MM	mitigation measure
MND	Mitigated Negative Declaration
MT	metric tons
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
PCD	Planned Community Development
PE	Professional Engineer
PG	Professional Geologist
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PPV	peak particle velocity
PRC	Public Resources Code
Project or proposed Project	1270 Garvey Street Digital Billboard Project
RCNM	Roadway Construction Noise Model
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SLF	Sacred Lands File
SO_X	sulfur oxides

Acronym/Abbreviation	Definition
STLC	Soluble Threshold Limit Concentration
SVP	Society of Vertebrate Paleontology
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound

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1 Introduction

1.1 Project Overview

The 1270 Garvey Street Digital Billboard Project (Project or proposed Project) consists of the construction and operations of a two-sided, V-shaped billboard at the western corner of the property located at 1270 Garvey Street in the City of Covina (City). The new billboard would consist of two digital sign faces that would be oriented toward the adjacent Interstate 10 (I-10) freeway.

1.2 California Environmental Quality Act Compliance

As lead agency for the proposed Project, the City must complete an environmental review to determine if implementation of the proposed Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study has been prepared to assist in making that determination. Based on the nature and scope of the proposed Project and the evaluation contained in the Initial Study environmental checklist (contained herein), the City, as the lead agency, concluded that a Mitigated Negative Declaration is the proper environmental documentation for the proposed Project. The Initial Study shows that impacts caused by the proposed Project are either less than significant or significant but mitigable with incorporation of appropriate mitigation measures as defined herein. This conclusion is supported by CEQA Guidelines Section 15070, which states that a Mitigated Negative Declaration (MND) can be prepared when "(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

1.3 Project Location

The Project site is located at 1270 Garvey Street within the southeastern portion of the City. One parcel is associated with the Project site, identified as Assessor's Parcel Number (APN) 8447-031-052. The Project site is located in an urbanized area in the southeastern portion of the City. Regional access to the site is provided via the I-10 freeway, which is located immediately west of the Project site. Figure 1-1 shows the regional location of the Project site. Local access is provided via East Holt Avenue, which is located immediately south of the Project site, East Garvey Street, which is located immediately north and west of the Project site, and South Village Oaks Drive, which is located approximately 50 feet north of the site. The Project site is bound by East Holt Drive and the I-10 freeway onramp to the south; the I-10 freeway and East Garvey Street to the west; a hotel facility, Jalapa Park, and East Garvey Street to the north; and East Garvey Street and Jalapa Park to the east.

1.4 Environmental Setting

General Plan and Zoning Designations

The Project site is located within the Village Oaks Office Park, which is a Planned Community Development (PCD) in the southeastern corner of the City. The Village Oaks Office Park is divided into three sub-areas, each representing a phase of development (Phase I, Phase II, and Phase III). The Project site is located in the Phase I area, as shown in Figure 1-2. Figure 1-2 shows the area of the City within the Village Oaks Office Park and the areas encompassed by each phase, as well as an outline of the Project site. The Village Oaks Office Park is within the City's Administrative and Professional Office (C-P) Zone and has a PCD overlay. Development within the Village Oaks Office Park is subject to design guidelines and conditions set forth in the approval of the PCD designation (Ordinance No. 1299, Ordinance No. 1510, and Ordinance No. 91-1725).

The City of Covina General Plan designates the Project site with a "General Commercial" (GC) land use designation (City of Covina 2022). Permitted uses within a GC land use designation include various types of retail and service businesses; administrative, professional, and organizational offices that serve a diverse population; institutional uses, such as churches, group homes, nursing homes, and hospitals; utility and transportation facilities; automotive sales; automotive repair shops; gas stations; self-storage outlets; animal hospitals; and parking lots (City of Covina 2000).

Existing Site Conditions

Figure 1-3 shows an aerial image of the Project site and its immediate surroundings. Under existing conditions, the Project site is fully developed with a two-story office building as well as associated improvements including a paved parking lot and landscaping. The site is approximately 1.64 acres and consists of a single parcel, APN 8447-031-052. The parcel is bound by East Garvey Street to the north and east, East Holt Avenue to the south, and the I-10 freeway to the west. The on-site office building features Spanish Colonial architecture and contains features such as clay roof tiles, white stucco walls, and wooden support beams.

On-site landscaping includes palm trees and turf located along the footprint of the building. Additionally, along the southern and western boundary of the parcel along East Holt Avenue and the I-10 freeway onramp, landscaping includes turf, shrubs, and trees, including several eucalyptus trees. Ingress and egress to the Project site's parking lot is provided via two driveways located along East Garvey Street. One is located along the western boundary of the Project site, while the other is located along the eastern boundary of the Project site.

Adjacent and Surrounding Land Uses

Figure 1-4 shows the land uses surrounding the Project site. To the northeast of the Project site is Jalapa Park, which is approximately 2 acres in size. To the northwest of the Project site is a two-story hotel building and an associated surface parking lot. To the southeast and east of the Project site are several office buildings of approximately 2-stories each, with associated surface parking. To the south is the I-10 freeway and associated onramps.

References

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

City of Covina. 2022 General Plan Land Use Map. https://covinaca.gov/city-departments/community-development/planning/.

2 Project Description

The proposed Project would involve the construction of a two-sided digital billboard on the western corner of the Project site. A conceptual design of the billboard structure, as well as the activities that would be required for construction and operations, is described in further detail below.

2.1 Design

A digital billboard consists of clusters of light-emitting diodes or LEDs that display illuminated sign content through the use of a computer that receives images remotely via the Internet. Digital billboards are equipped with lighting sensors and controls to adjust brightness based on ambient light conditions. The display can be dimmed at a specified time or a light sensor can be installed that determines ambient light levels and adjusts the brightness of the screen accordingly. The imagery that is displayed typically consists of a series of static slides, a video or animation sequence, or a combination of both. Digital billboards can also be used to display news feeds, live scores, traffic, social media content, local weather forecasts, countdowns, and other time-sensitive, local, and/or interactive content. Due to the energy required to illuminate the clusters of LEDs during both daytime and nighttime, digital billboards have electricity consumption that is greater than that of static billboards.

Upon Project implementation, the western corner of the Project site would be developed with a two-sided, V-shaped billboard. Both faces of the billboard would have a digital display. Figures 2-1 and 2-2 show the proposed location of the billboard on the Project site. One side of the billboard would face west while the other would face east, and both would be oriented toward the adjacent I-10 freeway. Each billboard face would be 14 feet in height and 48 feet in width. The billboard pole foundation would be approximately 5 feet in diameter. The billboard faces would be supported by a standalone pole structure, and the height of the billboard structure would be 83 feet. Figure 2-3 shows the elevations of the proposed billboard faces while Figure 2-4A and Figure 2-4B show renderings of the proposed billboard from east and west of the Project site along the I-10 freeway. The Project would not include any changes to the on-site office building or the on-site parking lot. However, the Project would require the removal of 1 to 2 existing eucalyptus trees along the southern portion of the Project site, and some of the existing trees to remain may require trimming. The trees that would be removed would be replaced with new vegetation.

2.2 Construction

Project construction is expected to occur in late 2024 or early 2025. Construction is expected to take approximately 2 weeks. Construction staging would occur within the Project site, and off-site improvements are not anticipated to be required.

An existing transformer is located near the west end of the Project site and would provide electrical services to the billboard. Minor trenching would be required within the existing on-site landscaping planter to establish the electrical connection between the billboard and the transformer. Telecommunications services would be established via a modem and would not require additional trenching. As such, all utilities connections would occur on site and would not require off-site construction activities.

Construction would involve the following primary activities: excavation for the billboard pole structure and foundation (anticipated to be approximately 30–35 feet deep and 5–6 feet wide), placement of the billboard pole

structure within the excavated area, assembly of the billboard sign faces, installation of the faces on the pole, tree trimming and removal, and vegetation planting. Soils removed during excavation are anticipated to be exported off site to a local landfill approved to accept soil and construction debris. During the first week of construction, the billboard would be constructed and installed. Specifically, excavation and pouring of the foundation are expected to take approximately 1 day to complete, and construction and installation of the billboard structure are expected to take approximately 5 to 6 days to complete. The second week would be used for landscaping improvements, such as installation of new landscaping to replace the removed trees. Anticipated equipment would include one bore/drill rig, two cranes, two loaders, two dump trucks, and two semi-trucks for hauling the sign components. All staging and construction work would be completed on the western portion of the on-site parking lot. During construction, approximately 17 of the existing parking spaces are anticipated to be occupied with construction activities and staging. The western driveway may also be closed to general parking lot ingress/egress during construction. The on-site office building and the eastern portion of the parking lot, including 43 parking spaces and the eastern driveway, would remain operational during construction activities. In addition, street parking is available on East Garvey Street, directly north of the building, should there be a need for additional temporary parking during Project construction.

2.3 Operations

During operation, the Project would consist of a two-sided, V-shaped billboard with displays oriented toward the I-10 freeway, facing east and west. The billboard would primarily display off-site advertising; however, the City would require a certain percentage of content to consist of City advertising (e.g., announcements for civic events). The amount of City content required to be displayed would be specified in the Development Agreement for the billboard.

The billboard would be illuminated by LEDs. Once installed, the billboard would generally be illuminated and in operation 24 hours per day, 7 days per week. Operations of the digital billboard, including lighting levels and digital content, would be in accordance with all federal, state, and local laws, as well as with established industry standards. Brightness levels would be automatically adjusted based on ambient light conditions (e.g., nighttime versus daytime). The digital display would change at a maximum rate of once every 4 seconds to 8 seconds, per industry standards and state law (California Code, Business and Professions Code (BPC), Section 5405). Digital imagery would be limited to cycling static images. No video, flashing, or motion would be displayed, pursuant to state law (BPC Section 5405). The digital billboard would be designed and constructed in accordance with an Outdoor Advertising Display Permit from the California Department of Transportation (Caltrans), which ensures compliance with the Outdoor Advertising Act.[1]

Operation of the Project would require additional electricity and, as such, would increase the energy use at the Project site relative to existing conditions. Estimated electricity consumption associated with the Project would be approximately 64,800 kilowatt hours (kWh) per year. Maintenance associated with the Project is anticipated to be required approximately once every two months, with additional maintenance activities possibly being required in the event of inclement weather. Maintenance activities would include a technician conducting routine maintenance on the sign's electrical components.

[1] Under the Outdoor Advertising Act (BPC Section 5200 *et seq*.), an Outdoor Advertising Display Permit administered by Caltrans is required for projects adjacent to an Interstate or primary highway. The Outdoor Advertising Display Permit sets forth criterion for display and display location of outdoor billboards and signage.

2.4 Updates to the Zoning Code & Village Oaks Office Park Regulations

In May 1975, the City established the Village Oaks Office Park PCD Overlay District (PCD 75-001) along with development regulations and design guidelines for the PCD area. Subsequently, the Village Oaks Office Park PCD was amended in 1981 and in 1991. The amendment in 1981 (Ordinance 1510) approved the precise plans for the Village Oaks Office Park (Phase III) project and imposed certain conditions of approval for the Phase III area. The amendment in 1991 (Ordinance 91-1725) approved the sign criteria of the Design Guidelines in the Village Oaks Office Park Area (Phases I, II and III). Subsequent to the adoption of the ordinances establishing the Village Oaks Office Park and the associated development regulations, the Village Oaks Office Park was largely built out.

The Project site is within an area designated as "Phase I" of the Village Oaks Office Park PCD. Under current conditions, off-site advertising signage is not allowable within the Village Oaks Office Park Area. As such, development of the proposed Project would require amendments to the Village Oaks Office Park PCD Overlay District. The amendments would state that off-site advertising is allowable within the Phase I area of the Village Oaks Office Park upon approval of a Conditional Use Permit (CUP). While this amendment would apply to the entirety of the Phase I area, additional freeway-facing off-site signage proposals are not anticipated by the City due to Caltrans requirements for spacing of billboards near state highway facilities. In the unlikely event of a future billboard proposal within another portion of the Village Oaks Office Park, the City would require discretionary approvals (CUP, Zoning Code Amendment, etc.) and associated CEQA review.

The Project site would also need to be placed into an overlay zone for Outdoor Advertising Structures (also referred to as the "S zone"), pursuant to Chapter 17.56 of the City's Municipal Code. Chapter 17.56, Overlay Zone (Outdoor Advertising Structures), states that outdoor advertising structures are only permitted on properties that are within the S overlay zone. Upon Project approval, the Project site would thus be zoned as C-P with a PCD overlay and an S overlay. The text of Chapter 17.56 would also need to be amended in order to allow for the Project. Chapter 17.56 currently allows for S zones to be overlaid only upon the M-1 zone. Additionally, the Project would not be in compliance with certain restrictions in Chapter 17.56, including limitations on billboard height and location. The Project would thus require amendments to Chapter 17.56 in order to bring the Project into consistency with the City's Zoning Code requirements for off-site advertising. The amendments to Chapter 17.56 would be designed for the purposes of this Project only and would not open new areas of the City to billboard development without further discretionary review and approval. As stated above, additional freeway-facing off-site signage proposals are not anticipated by the City due to Caltrans requirements for spacing of billboards near state highway facilities. In the unlikely event of a future billboard proposal within another portion of the City, the City would require discretionary approvals and associated CEQA review.

2.5 Required Permits and Approvals

City Permits and Approvals

The proposed project would require a number of discretionary permits and approvals from the City, listed below.

- PCD Amendment (Zoning Code Amendment): an ordinance to amend the Village Oaks Office Park PCD Overlay District to expand the land use category for off-site signage (billboards) and to change the

"Provisional Plan" enacted with the approval of the Village Oaks Office Park Phase I/PCD to approve a "Provisional Plan" for the proposed off-site signage (billboard).

- Zoning Code Amendment: a Zoning Code Amendment is required to place the Project site within an overlay zone for Outdoor Advertising Structures (also referred to as the "S zone"), pursuant to Chapter 17.56 of the City's Municipal Code, as well as a Zoning Code Amendment to amend the text of Chapter 17.56 to allow for the Project.
- Conditional Use Permit
- Precise/Site Plan Review (required for changes to the Village Oaks Office Park Provisional Plan)
- Development Agreement between the City of Covina and project applicant (Bulletin Displays)

Approvals and Review from Other Agencies

Approvals from other agencies may also be required and are listed below.

- California Department of Transportation (Caltrans) – Outdoor Advertising Display Permit

3 Initial Study Checklist

1. **Project title:**

   1270 Garvey Street Digital Billboard Project (Project or proposed Project)

2. **Lead agency name and address:**

   City of Covina
   125 East College Street
   Covina, California 91723

3. **Contact person and phone number:**

   Brian Lee, AICP
   125 East College Street
   Covina, California 91723
   626.384.5450

4. **Project location:**

   1270 East Garvey Street
   Covina, California 91724

5. **Project sponsor's name and address:**

   Mark A. Kudler, President
   Bulletin Displays
   3127 E. South Street, Ste. B
   Long Beach, California 90805
   310.285.5384

6. **General plan designation:**

   General Commercial

7. **Zoning:**

   C-P zone with a Planned Community development (PCD) overlay

8. **Description of Project:**

   See Section 2 of this document.

9. **Surrounding land uses and setting: Briefly describe the Project's surroundings:**

   - **North**: East Garvey Street, a two-story hotel building, and an associated surface parking lot

- **East**: East Garvey Street and Jalapa Park
- **South**: East Holt Avenue and vacant land
- **West**: Interstate-10

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

    - Caltrans

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

    Yes, the Gabrieleno Band of Mission Indians - Kizh Nation requested consultation. See Section 3.18 for details.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

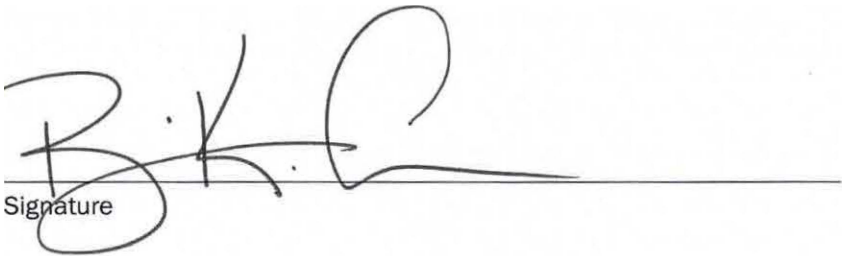
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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



Signature

2·7·24

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS** – Except as provided in Public Resources Code Section 21099, would the project**:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

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

Less Than Significant Impact. Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Scenic vistas generally refer to views that are accessible from public vantage points, such as public roadways and parks. There are no officially designated scenic vistas in the City (City of Covina 2000). However, views of the San Gabriel Mountains and the Covina Hills are available from a variety of locations throughout the City. Scenic highway corridors are designated under the California Scenic Highway Program to preserve the aesthetic value of lands adjacent to and visible from highways. There are currently no designated scenic corridors within or visible from the Project site (Caltrans 2023). In addition to scenic highways, Caltrans also designates certain sections of its network as "classified landscaped freeways." Classified landscaped freeways are sections of freeway with ornamental vegetation that meet the criteria set forth in the California Code of Regulations, Sections 2500–2519 (Title 4, Division 6, Chapter 5, "Outdoor Advertising Displays Adjacent to Landscaped Freeways"). An approximately 1,300-foot segment of the I-10 freeway adjacent to the Project site is currently listed as a classified landscaped freeway by Caltrans (I-10 Post Mile 38.850 to Post Mile 39.100) (Caltrans 2024a). Pursuant to state regulations (BPC Section 5440) and local regulations (Municipal Code Section 17.56.050), advertising displays are generally not allowed on property adjacent to a classified landscaped freeway. However, the Project applicant has represented that the applicant and Caltrans have an established Relocation Agreement that would allow

the billboard to be permitted by Caltrans on the Project site, despite the adjacent landscaped freeway designation. At the local level, discretionary approvals are required for the Project, including Zoning Code Amendments (see Section 2.4 and 2.5 for details). Upon approval of these amendments, the Project would be allowable on the Project site at the local level. The City would include a condition of approval for the Project stating that the applicant must demonstrate to the City of Covina that Caltrans has issued a permit for the billboard, prior to commencement of construction. This condition of approval would ensure that the Project is in compliance with the Relocation Agreement and all applicable Caltrans requirements.

Ornamental freeway landscaping is located south of the proposed billboard location (on the south side of the freeway) and east of the billboard location (on the north side of the freeway). The billboard would rise above an existing freeway sound wall adjacent to the Project site and would not obstruct or otherwise interfere with views of the ornamental freeway landscaping. Classified landscaped freeways are described by Caltrans as sections of freeways that have been landscaped within the state right-of-way and are generally located in urban areas. In contrast, scenic highways contain natural scenic beauty and require protection of scenic corridors (Caltrans 2024b). As such, the landscaped freeway designation does not indicate the presence of scenic vistas that could be adversely affected by the Project.

The viewshed experience from public areas in the vicinity of the Project site is primarily dominated by views of commercial development, roadways, trees, and some views of the San Gabriel Mountains and the Covina Hills. Under existing conditions, the Project site is developed with a two-story office building and a surface parking lot. Partially obstructed views of the Covina Hills are available when looking south from the Project site, while views of the San Gabriel Mountains when looking north from the Project site are generally limited by surrounding commercial development and trees.

Views of and through the Project site are experienced from several surrounding public vantage points: the I-10 freeway, Jalapa Park, East Garvey Street, and East Holt Avenue. Views from these public vantage points and the potential effects of the proposed Project are described and analyzed below. Additionally, the potential for the billboard to be visible from locations further from the site is reviewed below. This analysis is based on Google Earth imagery, as well as a "flagging study" conducted by the Project applicant, which involves using a crane to raise a flag at the proposed billboard location and then observing locations in the surrounding community where the flag is visible or partially visible.

I-10 Freeway. The I-10 freeway is a major highway with a total of 12 travel lanes. It extends east–west, just south of the City's southern borders. The proposed billboard would be visible from segments of the I-10 freeway near the Project site.

- Westbound I-10 Freeway. Western-facing views on the I-10 freeway in the vicinity of the Project site largely consist of existing roadways, commercial and residential development, and trees. For travelers in the westbound lanes, the billboard would become clearly visible near the Holt Avenue exit (Exit 38B), about 1,165 feet east of the proposed billboard location. The curvature of the freeway would generally block clear views of the billboard from further away (i.e., further east on the westbound side of the freeway) (Bulletin Displays 2023). Views of scenic resources, including the Covina Hills and San Gabriel Mountains, are not visible when looking towards the Project site from the westbound lanes of the I-10 freeway, as shown in Figure 2-4A. Therefore, while the proposed billboard would be visible as travelers approach the Project site, the billboard would not disrupt western-facing views of scenic resources along the I-10 freeway.

- Eastbound I-10 Freeway. Views of the Covina Hills are visible from the I-10 freeway in the vicinity of the Project site when looking east from the eastbound travel lanes. The billboard would become readily visible near the Holt Avenue exit (Exit 38B), about 1,110 feet west of the proposed billboard location (Bulletin Displays 2023). However, more distant views of the billboard may be visible from further away (i.e., further west on the eastbound side of the freeway), based on the orientation of the freeway relative to the billboard location. The billboard could result in disruptions to views of the Covina Hills from the I-10 freeway. Under existing conditions, however, the views that would be disrupted by the Project are heavily obstructed by trees that are located in the Project area. Therefore, as shown in Figure 2-4B, the Project would not substantially interfere with the existing views of the Covina Hills from the I-10 freeway. The billboard would be placed in an area in which views are heavily obstructed under existing conditions.

Overall, views of the billboard along the I-10 freeway would be relatively fleeting. The speed limit along the I-10 freeway in the vicinity of the Project site is 65 miles per hour, and the curvature and topography of the freeway would limit long-distance views to the billboard, particularly for westbound travelers. While the Project would be readily visible from the I-10 freeway, it would not have substantial adverse effects to scenic vistas as observed from the I-10 freeway.

Jalapa Park. Jalapa Park is located to the north/northeast of the Project site. The park would be separated from the billboard structure by East Garvey Street and by the on-site two-story office building. Nevertheless, the top of the billboard structure would be 83 feet in height and would thus project over the top of the on-site office building. The digital sign faces would be oriented toward the I-10 freeway, away from the direction of the park. The illuminated sign faces and advertising content would not be readily visible from the park, but the back and sides of the billboard structure may be visible from certain vantage points within the park and along adjacent roadways. The park itself is heavily vegetated, which may obstruct or screen views to the billboard from some vantage points within the park. Views from the park looking towards the billboard location do not include any scenic resources. As such, even though portions of the billboard structure may be visible from within and/or near the park, the Project would not have substantial adverse effects to scenic vistas as observed from Jalapa Park.

East Garvey Street. East Garvey Street is a two-lane roadway that borders the Project site to the north and west and then continues along the alignment of the I-10 freeway. Where East Garvey Street winds around the Project site, views of the back and/or side of the billboard structure would be visible from certain vantage points. However, similar to the viewshed from Jalapa Park, no scenic vistas are available from this portion of East Garvey Street. West of the Project site, East Garvey Street becomes a frontage road to the I-10 freeway and is separated from the freeway by a sound wall. The billboard would be visible to eastbound travelers along this section of East Garvey Street. Along portions of eastbound East Garvey Street, a narrow view of the Covina Hills can be observed between the sound wall and vegetation. The billboard may affect or partially affect this view. However, the existing view is narrow, relatively fleeting, and has already been substantially compromised by the freeway sound wall and existing vegetation. Effects to scenic vistas from East Garvey Street may occur but would not be significant or adverse.

East Holt Avenue. East Holt Avenue is a four-lane roadway bordering the east side of the Project site, extending northeast–southwest through Covina and West Covina. At the border of Covina and West Covina, East Holt Avenue passes underneath the I-10 freeway. To the north of the I-10 freeway, views of the billboard structure would be available to southbound travelers on East Holt Avenue within the vicinity of the Project site. Such views would largely consist of the back or sides of the billboard structure, since the illuminated

faces would be oriented towards the I-10 freeway. North of the intersection of East Holt Avenue with Park View Drive, the billboard would become largely obstructed by vegetation (Bulletin Displays 2023). Views from East Holt Avenue looking south/southwest towards the Project site do not include scenic vistas; as such, visibility of the billboard structure as travelers approach the Project site would not result in adverse effects to scenic vistas. To the south of the I-10 freeway, northbound travelers along East Holt Avenue would have views of the billboard when looking towards the freeway. However, as with southbound travelers, no scenic vistas are observable that could potentially be compromised by the billboard structure. As such, even though the billboard would be visible from certain portions of East Holt Avenue, the Project would not have substantial adverse effects to scenic vistas as observed from East Holt Avenue.

To the north and northwest of the Project site, the flagging study (Bulletin Displays 2023) demonstrates that the billboard would not generally be visible from locations north of Jalapa Park. Specifically, along South Village Oaks Drive north of Jalapa Park, the billboard would be obstructed by vegetation. (South Village Oaks Drive extends north–south directly to the north of the Project site.) To the northwest, buildings and vegetation were shown to block the billboard from public vantage points within the residential neighborhood near Center Court Drive and South Forest Hills Drive (Bulletin Displays 2023).

To the south and southwest of the Project site, the flagging study demonstrates that the billboard would be visible or partially visible from several public vantage points within residential neighborhoods to the south of the I-10 freeway. For example, views of the billboard (including its illuminated sign faces) would be available from certain vantage points along East Temple Way and East Garvey Avenue South, in the vicinity of the Project site. Views of the billboard at these locations would be intermittent, due to intervening vegetation, structures, and the sound wall bordering the I-10 freeway (Bulletin Displays 2023). Furthermore, views of scenic resources are not available when looking towards the Project site from these locations. As such, while the billboard would be intermittently visible from public vantage points south of the Project site and the I-10 freeway (including from residential streets), substantial adverse effects to scenic vistas would not occur.

For the reasons described above, the implementation of the Project would not have the potential to substantially degrade or obstruct an existing scenic vista and effects on scenic vistas would be **less than significant**.

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

No Impact. There are no state scenic highways that contain views of the Project site. The nearest eligible state scenic highway is State Route 39, which is located approximately 4.3 miles northwest of the Project site (Caltrans 2023). The nearest officially designated state scenic highway is State Route 91, which is located approximately 15.2 miles south of the Project site (Caltrans 2023). As such, the Project would not substantially damage scenic resources within a state scenic highway, and there would be **no impact.**

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

Less Than Significant Impact. As established in California Public Resources Code (PRC) Section 21071, an urbanized area is defined as an incorporated city that has a population of at least 100,000 people or

one that has a population of less than 100,000 people but the population of the city and not more than two contiguous incorporated cities combined equals at least 100,000 people. According to the U.S. Census Bureau, the City of Covina had a 2021 population of 50,411 residents (U.S. Census Bureau 2023a). The City of West Covina, which is located adjacent to the City of Covina, had a 2021 population of 107,017 (U.S. Census Bureau 2023b). As such, the City of Covina, which includes the Project site, is considered an urbanized area pursuant to PRC Section 21071.

The Project site is surrounded by existing urban development, including residential uses, commercial uses, and roadways. The Project site is located in the PCD Overlay District for the Village Oaks Office Park, has a general plan land use designation of General Commercial, and is within the C-P zone. Under existing conditions, billboard structures are not permitted within the PCD Overlay District for the Village Oaks Office Park, nor are they permitted within the C-P zone. As such, the Project proposes amendments to the PCD Overlay District and to the zoning code to allow for the construction and operation of the proposed billboard on the Project site. Additionally, a Zoning Code Amendment is required to place the Project site into the "S" overlay zone and to amend the text of Chapter 17.56, in order to allow for an outdoor advertising structure to be placed on the property. Upon approval of the necessary amendments, the Project would be in compliance with local zoning and land use designations. Furthermore, the Project would be subject to the City's development and design review process. As part of this process, project plans are reviewed with the intent of encouraging efficient, aesthetic, and desirable use of land. The Project would also require an Outdoor Advertising Display Permit issued by Caltrans and would be subject to compliance with the Outdoor Advertising Act and all Caltrans permit requirements for billboards along state freeway facilities. However, as described above under Section 3.1(a), the Project is located adjacent to a classified landscaped freeway, where billboards are not generally allowed under state or local law. The Project applicant has represented that the applicant and Caltrans have an established Relocation Agreement that would allow the billboard to be permitted by Caltrans on the Project site, despite the landscaped freeway designation. At the local level, discretionary approvals are required for the Project, including Zoning Code Amendments, as described above. Upon approval of these amendments, the Project would be allowable on the Project site at the local level. The billboard would rise above an existing freeway sound wall immediately adjacent to the Project site and would not obstruct or otherwise interfere with views of the nearby ornamental freeway landscaping. As such, while the billboard is proposed adjacent to a classified landscaped freeway segment, it would not substantially degrade or interfere with the existing landscaping. The Project would be subject to all other applicable provisions of the Outdoor Advertising Act. Upon approval of the required local Zoning Code Amendments and Caltrans' approval of an Outdoor Advertising Display Permit, the Project would be brought into consistency with applicable zoning and permitting requirements at the state and local level. Compliance with the City's Municipal Code and the local development and design review process would ensure the Project's scenic quality to the satisfaction of the City. Impacts would be **less than significant.**

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

Less Than Significant Impact with Mitigation Incorporated. The existing lighting conditions in the Project area include a variety of light sources that contribute to a moderately high illuminated outdoor environment. Light sources in the immediate Project vicinity include streetlights, building lighting, and vehicle headlamps illuminating the I-10 freeway, East Garvey Street, and East Holt Avenue. The parking lot at the Project site is illuminated, and the commercial building on the Project site has exterior illumination sources. Nearby commercial uses, such as the hotel property to the northwest and the office buildings to the southeast and

east of the Project site, are similarly illuminated. While the immediate Project area is generally commercial in nature, there are other land uses in the vicinity with lower nighttime light levels and fewer lighting sources. Specifically, Jalapa Park is located approximately 350 feet from the proposed billboard location. The park is heavily vegetated and is primarily developed with passive recreational uses. Low-density residential uses are located approximately 800 feet to the east of the Project site. Residential uses within the City of West Covina are located across the I-10 freeway from the Project site. The nearest such properties are zoned as "Residential Single Family" and "Residential Agriculture" and are located approximately 600 feet and 400 feet south of the Project site, respectively. Residential neighborhoods in Covina and West Covina are also located to the north and northwest of the Project site, the closest of which are approximately 450 feet northwest of the Project site. No off-site advertising billboards are located in the Project vicinity under existing conditions.

The proposed billboard would introduce a new source of light to the Project area, in the form of two illuminated digital sign faces. The digital sign faces would be oriented towards the I-10 freeway. Near the Project site, the I-10 freeway supports approximately 6 lanes in each direction (for a total of 12 lanes). The freeway is illuminated with streetlights and supports volumes of approximately 200,000 vehicles per day on average in the vicinity of the Project site (Caltrans 2021). The Project would be required to comply with Caltrans requirements for digital billboards along Caltrans facilities. Such requirements prohibit advertising displays that simulate or that may be confused with traffic control devices. Flashing, intermittent, or moving lights and video imagery are prohibited, as are red, blinking, or intermittent lights that could be mistaken for a warning or danger sign. Additionally, vision-impairing illumination as defined in Section 21466.5 of the Vehicle Code is prohibited (BPC Sections 5403 and 5405). The Project would require approval of an Outdoor Advertising Display Permit from Caltrans, which would ensure that the lighting specifications established by Caltrans for billboards along Caltrans facilities are implemented. Required compliance with Caltrans' billboard lighting standards would ensure that travelers on the I-10 freeway would not be subject to adverse light or glare effects. Additionally, views of the billboard from the I-10 freeway would be relatively fleeting. The speed limit along the I-10 freeway in the vicinity of the Project site is 65 miles per hour, and the curvature and topography of the freeway would limit long-distance views to the billboard, as described in Section 3.1(a). Furthermore, as also described in Section 3.1(a), the billboard structure itself would not adversely impact views of scenic resources that can be observed from the I-10 freeway. As such, the light and glare produced by the billboard similarly would not be expected to adversely affect views available from the I-10 freeway. For these reasons, travelers along the I-10 freeway would not be subject to substantial light/glare effects from the Project such that daytime or nighttime views would be adversely affected.

While the Project is designed to be viewed by travelers along the I-10 freeway, the illuminated sign faces have the potential to create light trespass at nearby properties to the north, east, south, and/or west of the Project site. Some properties in the vicinity of the Project site are developed with land uses that may be light sensitive. Residential properties are generally considered to be light-sensitive receptors. Light-sensitive receptors may also include hotel, hospital, or nursing home uses, where excessive light at night may impact the use of the property. In addition to light trespass, views of the illuminated sign faces in contrast to a darker background (e.g., the night sky) may create glare that could be visible at nearby light-sensitive receptors. The nearest light-sensitive receptor to the Project site is a hotel property located approximately 60 feet to the northwest of the Project site. Other nearby light-sensitive receptors include residential uses, the closest of which are approximately 400 feet to the south (across the I-10 freeway) and approximately 450 feet to the northwest of the Project site. A retirement home is located approximately 430 feet east of the Project site.

The potential effects of the billboard on nearby light-sensitive receptors are described further below. The discussion is divided into an analysis of billboard luminance and associated glare effects and billboard illuminance and associated light trespass effects.

Luminance and Glare

Glare is defined as visual discomfort resulting from high contrast in brightness levels. Substantial glare impacts can adversely affect daytime and/or nighttime views. The magnitude of the sensation of glare depends on factors such as the size, position, and luminance of sources, the number of sources, and the luminance to which the eyes are adapted. Luminance is a measure of emissive or reflected light from a specific surface in a specific direction and over a standard area. Luminance can be measured in units of candelas per square meter. As discussed above, a variety of light-sensitive uses are located within the vicinity of the Project site. Views of the illuminated billboard faces would be available from some of the nearby properties that are developed with light-sensitive uses, particularly from some residential properties to the south of the I-10 freeway (see Section 3.1(a) for a discussion on the visibility of the billboard from surrounding areas). Unlike views of the illuminated billboard faces as observed from the I-10 freeway, views of the Project from nearby properties would be fixed as opposed to fleeting. While the billboard faces would not obstruct scenic resources in the Project area as described in Section 3.1(a), the illuminated sign faces (particularly when viewed in contrast to the background of the night sky) may produce glare that could adversely affect views from light-sensitive use properties, primarily at night.

The City's Municipal Code does not provide quantitative luminance standards applicable to the Project. The Outdoor Advertising Association of America recommends that nighttime luminance levels for digital billboards not exceed 350 nits (one nit is equivalent to one candela per meter squared) (OAAA 2024). Other jurisdictions in Los Angeles County have set forth more restrictive limitations of 300 candelas per meter squared for digital billboards (City of West Hollywood 2019, City of Los Angeles 2019), and the City of Los Angeles recently adopted an ordinance for a new sign district with luminance limitations of 300 candelas per meter squared (nits) for digital displays (City of Los Angeles 2023). In the absence of specific requirements applicable to the proposed Project, the City has determined that a limitation in nighttime luminance of 200 candelas per meter squared is appropriate. This luminance level is more conservative than industry standards and when compared to levels set forth for digital billboards in the cities of Los Angeles and West Hollywood. Given that Covina is generally characterized by reduced nighttime use intensity relative to West Hollywood and Los Angeles, the City determined that a lower luminance level would be appropriate. In order to ensure that the nighttime luminance level of 200 candelas per meter squared is maintained throughout the life of the Project, mitigation measures **MM-AES-1** and **MM-AES-3** have been set forth herein. MM-AES-1 requires that sign luminance shall not exceed 200 candelas per meter squared (or nits) after sunset, and MM-AES-3 requires annual verification that the required luminance levels are being maintained. Limiting sign luminance to a level below industry standards would reduce the potential for the billboard faces to create glare as observed from nearby light-sensitive properties.

During the daytime, the visual contrast between the billboard and the surrounding environment would be reduced through the presence of sunlight. MM-AES-1 would provide a daytime luminance limit of 7,500 candelas per meter squared (or nits) between sunrise and sunset, which would allow the billboard's content to be visible during the daytime while avoiding substantial contrast.

As required by state law and as described in MM-AES-1, the billboard would employ a photocell that would adjust billboard luminance in response to ambient lighting conditions, such that the billboard luminance would be gradually dimmed near sunset and during cloudy weather. Through implementation of MM-AES-1 and MM-AES-3, the billboard is not anticipated to produce a significant source of glare in the Project area such that daytime or nighttime views would be adversely affected.

Illuminance & Light Trespass

The proposed billboard could result in potentially significant impacts if it were to generate light trespass at light-sensitive properties such that daytime or nighttime views are adversely affected. Light trespass is measured in terms of illuminance in a unit of measurement called a "footcandle," which is typically defined as the illuminance on a one-square-foot surface coming from a uniform source of light.

The City does not have an established light trespass threshold that would be applicable to the Project. However, the City and the adjacent City of West Covina both have municipal code provisions limiting light trespass onto residential properties in certain circumstances. These limitations are cited herein to establish context for light trespass levels that are generally considered unacceptable in the Project vicinity. Specifically, Section 9.42.020 of the City's Municipal Code regulates light trespass affecting adjacent residential uses:

> *Covina Municipal Code, Section 9.42.020 – Sources of environmental disturbances.*
> *The following disturbances, when imposed upon residential uses only, are declared to be unnecessary and contrary to the intent of this chapter. Such disturbances, however, shall not be deemed exhaustive:*
>
> ...
>
> *B. Glare. No operation, activity, sign, or lighting fixture shall create illumination that exceeds five foot-candles on any adjacent property, whether the illumination is direct or indirect light from the source. Glare levels shall be measured with a photoelectric photometer following the standard spectral luminous efficiency curve adopted by the International Commission on Illumination. For purposes of this subsection, a foot-candle is the illumination produced by a light of one international candle upon a surface one foot away.*

The Project site is not adjacent to residential uses within the City of Covina; as such, the above provision may not be directly applicable to the Project. Nevertheless, this provision establishes context for light trespass levels that are generally considered unacceptable for the City's residential properties.

The border of West Covina is adjacent to the Project site (see Figure 1-3). Residential properties to the south of the Project site are within the City of West Covina, and some of these properties may have views to the billboard. As such, the City of West Covina's regulations for light trespass are also considered herein and are listed below.

> *West Covina Municipal Code, Section 26-318 – Illumination*
>
> *(a) Signs shall be designed, installed, and maintained in such a manner that the spillover of any illumination of signs onto residential property shall not exceed two (2.0) foot candles*

> *above ambient light levels, and the spillover of glare produced by the illumination of signs shall not negatively impact any surrounding properties.*
>
> *West Covina Municipal Code, Section 26-409 - Mechanical equipment and lighting in RA/R-1 zones*
>
> ...
>
> *(e) Lighting shall be designed, installed, and maintained in such a manner that illumination spillover from such lighting does not exceed 2.0 foot candles above ambient illumination levels onto another residential property and glare spillover from such lighting will not negatively impact another residential property.*
>
> *(1) Illumination and/or glare spillover onto other property shall be measured from any point five (5) feet above natural grade on a vertical plane on the other property. Ambient illumination shall include only non-artificial light and street lights present exclusive of the offending light source.*
>
> *(2) If, upon inspection by authorized city staff, it is determined that a violation of this section is occurring, the planning director may require mitigation measures in order to minimize impacts, including, but not limited to: Relocation (setback, height restrictions) of the fixture, reduction of lamp wattage, the installation of hoods, shields, louvers, or other fixtures accessories to redirect light, the installation of coated or frosted lamp covers to soften glare, the re-aiming of the fixture, or the placement of landscaping or fencing as barriers.*

Based upon the regulations cited above, light trespass onto residential properties from a light source (such as a sign) in excess of 2–5 footcandles above ambient levels are generally considered unacceptable in Covina and West Covina.

In addition to the local regulations summarized above, the state has established designations for outdoor Lighting Zones (LZs), which correspond to light trespass recommendations established by the Illuminating Engineering Society (IES). Specifically, Section 10-114 of the California Building Energy Efficiency Standards establishes rules for implementing outdoor LZs, and Table 10-114-A shows definitions for LZ0 through LZ4. As defined therein, LZ0 applies to areas of very low ambient lighting, and LZ4 applies to areas of high ambient lighting. All urban areas as defined by the U.S. Census are designated as LZ3 (moderately high ambient illumination) by default under the California Energy Code. The City is within an urbanized area as designated by the U.S. Census (SCAG 2023). As such, a designation of LZ3 is appropriate for the Project site and City. As stated in Section 10-114, "Special districts within a default LZ3 may be designated as LZ4 by a local jurisdiction for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels." While the Project area is urbanized, it has not been designated by the City as an LZ4 and is not an area of high intensity nighttime use, such as an entertainment district.

The IES and the American National Standards Institute (ANSI) define recommended light trespass levels for each outdoor LZ within ANSI/IES RP-8-22 (Recommended Practice: Lighting Roadway and Parking Facilities). Table 4-2 within ANSI/IES RP-8-22 limits the maximum light trespass for LZ3 to 8.0 lux, or 0.74 footcandles. As such, the appropriate light trespass limit applicable in the Project area would be 0.74 footcandles.

Given the above, the City has determined that light trespass caused by the Project in excess of 0.74 footcandles at the properties of light-sensitive land uses would be considered significant. This level of light trespass is more stringent than levels established for residential properties in both the Covina Municipal Code and the West Covina Municipal Code and would be consistent with the more conservative standards set forth by the IES and ANSI. In order to ensure that the Project does not create light trespass in excess of 0.74 footcandles at light-sensitive properties, **MM-AES-2** has been set forth and would limit light trespass from the Project to 0.74 footcandles above ambient lighting at light-sensitive properties. MM-AES-3 would require annual monitoring to verify that this light trespass limit is met throughout the life of the Project. However, as noted in MM-AES-2, annual monitoring for light trespass can be omitted in the event that the applicant elects to install light blocking technology, such as louvers, on the billboard. Once the effectiveness of the louvers is verified as required by MM-AES-3, ongoing annual verification would not be needed, since light blocking technology would be physically integrated as part of the billboard structure and would thus remain in place throughout the life of the Project.

Through implementation of MM-AES-1, MM-AES-2, and MM-AES-3, the Project is not anticipated to produce light or glare such that daytime or nighttime views would be adversely affected. Nevertheless, given the proximity of the Project site to light-sensitive receptors, such as residential properties and a hotel property, **MM-AES-4** has been included herein to support coordination and cooperation with the surrounding community. MM-AES-4 sets forth a complaint system for light/glare concerns related to the Project. As required by MM-AES-4, complaints about light and/or glare from the billboard will be investigated by the City, and the sign luminance and/or illuminance will be tested, if deemed necessary, to ensure that the required lighting levels are being maintained.

In summary, the proposed billboard would introduce a new source of light and glare to the Project area. The City does not have requirements in place to limit the brightness or light trespass produced by the billboard. As such, in the absence of mitigation, the billboard could potentially be of sufficient brightness to generate significant glare and/or light trespass such that views from nearby light-sensitive use properties are adversely affected, particularly during the nighttime. MM-AES-1 and MM-AES-2 set forth limits for the billboard's light levels that are consistent with, or more stringent than, industry standards, state standards, and standards established in other jurisdictions within Los Angeles County. MM-AES-3 would ensure consistent, on-going monitoring and verification of the lighting levels established in MM-AES-1 and MM-AES-2, and MM-AES-4 would allow for cooperation and coordination with the surrounding community for light/glare concerns. With implementation of MM-AES-1, MM-AES-2, MM-AES-3, and MM-AES-4, the Project's light and glare impacts would thus be reduced to less than significant. Impacts related to light and glare are considered **less than significant with mitigation incorporated**.

MM-AES-1 Sign Luminance

Sign luminance measured on the sign surface perpendicular to the sign face shall not exceed 200 candelas per meter squared (or nits) after sunset, and 7,500 candelas per meter squared (or nits) between sunrise and sunset. Pursuant to state law, the sign must be equipped with a time clock and photocell to automatically adjust the sign luminance according to the time of day and ambient lighting conditions. When ambient sunlight illuminance during the daytime is less than 100 footcandles, the sign shall transition from the daytime luminance level to the nighttime luminance level. Transitions between luminance levels shall be made smoothly and at a consistent rate over the course of an extended time period (15 minutes to 20 minutes at a minimum).

MM-AES-2 Light Trespass/Illuminance

The Project shall not exceed 0.74 footcandles above ambient lighting levels at sensitive use properties (defined as properties with residential, hotel, retirement home, and/or hospital uses).

The applicant may install a billboard equipped with light blocking technology, such as louvers, to direct light toward the Interstate 10 freeway and to substantially limit light emitted to adjacent areas, including nearby sensitive use properties. The light blocking technology component shall be depicted on Project plans during plan check. If the applicant installs light-blocking technology, on-going annual illuminance testing as described in MM-AES-3 shall not be required.

MM-AES-3 Testing

The Project applicant shall provide a renewable cash deposit to be used by the City of Covina to produce Lighting Testing Reports verifying luminance and illuminance. The renewable cash deposit shall be of an amount specified by the Community Development Department Director.

Lighting Testing Reports shall be conducted upon installation of the Project, three months after installation, and annually thereafter. Illuminance can be omitted from annual testing if Light Blocking Technology is installed as described in MM-AES-2.

The Lighting Testing Reports shall be prepared pursuant to the requirements defined below and shall demonstrate that the sign complies with the requirements of MM-AES-1 and MM-AES-2. If the illuminance requirement defined in MM-AES-2 is not met, sign luminance shall be reduced until the sign complies.

Lighting Testing Report(s) shall document the results of testing conducted by a Qualified Lighting Professional or under the direction of a Qualified Lighting Professional. The Qualified Lighting Professional shall be selected to the satisfaction of the Community Development Department Director and is defined as a Professional Engineer, Illuminating Engineering Society member, and/or other equivalent professional recognized by the state. Illuminance testing shall be conducted at the property line of nearby sensitive-use properties, which shall include residential and hotel properties in the Project vicinity. Testing locations shall be selected in coordination with, and to the satisfaction of, the Community Development Department, and testing methodology shall be in accordance with City-approved protocol.

MM-AES-4 Light/Glare Complaints

Complaints about light and/or glare will be investigated by the City, and if determined necessary by the Director of Community Development, an updated Lighting Testing Report shall be produced. The Lighting Testing Report shall adhere to the requirements outlined in MM-AES-3.

References

Bulletin Displays. 2023. Covina Flagging at 1270 E. Garvey St. August 31, 2023.

Caltrans (California Department of Transportation). 2021. Traffic Volumes: Annual Average Daily Traffic (AADT). 2021 AADT. Accessed January 12, 2024. https://dot.ca.gov/programs/traffic-operations/census.

Caltrans. 2023. California State Scenic Highway System Map. Accessed April 4, 2023. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

Caltrans. 2024a. Classified Landscaped Freeways List. Prepared by the California Department of Transportation Landscape Architecture Program. January 9, 2024. Accessed January 12, 2024. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-b-classified-landscaped-freeways.

Caltrans. 2024b. Landscaped Freeways – Questions and Answers. Accessed January 12, 2024. https://dot.ca.gov/-/media/dot-media/programs/design/documents/class-ls-fwy-q-and-a-a11y.pdf.

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

City of Los Angeles. 2019. Guide to Off-Site Signs (Billboards) in the City of Los Angeles – Policies, Programs, Processes, and Provisions. Draft. May 2019. Accessed January 10, 2024. https://clkrep.lacity.org/onlinedocs/2011/11-1705_misc_05-22-2019.pdf.

City of Los Angeles. 2023. Ordinance No. 188082. LA Metro – Transportation Communication Network. Approved December 26, 2023. Accessed January 12, 2024. https://clkrep.lacity.org/onlinedocs/2022/22-0392_ord_188082_02-05-2024.pdf.

City of West Hollywood. 2019. Sunset Boulevard Off-Site Signage Policy. Adopted March 18, 2019. Accessed January 10, 2024. https://www.weho.org/city-government/city-departments/community-development-department/long-range-planning/land-use-planning/sunset-boulevard-arts-advertising.

OAAA (Outdoor Advertising Association of America). 2024. "Digital Billboard Lighting Measurement." Digital Lighting Guidelines. Accessed January 10, 2024. https://oaaa.org/resources/digital-lighting-guidelines/.

SCAG (Southern California Association of Governments). 2023. U.S. Census Urbanized Areas – SCAG Region. October 18, 2023. Accessed January 11, 2024. https://gisdata-scag.opendata.arcgis.com/datasets/c98ee3c6677d43058d30ed53c41c965a_0/explore?location=34.141356%2C-117.778548%2C11.60.

U.S. Census Bureau. 2023a. Quick Facts, Covina city, California. Accessed April 4, 2023. https://www.census.gov/quickfacts/covinacitycalifornia.

U.S. Census Bureau. 2023b. Quick Facts, West Covina city, California. Accessed April 4, 2023. https://www.census.gov/quickfacts/westcovinacitycalifornia.

3.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	**AGRICULTURE AND FORESTRY RESOURCES** – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. According to the California Department of Conservation (CDOC), the Project site is located on "Urban and Built-Up Land" and does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (CDOC 2022). As such, the Project would not result in the conversion of Farmland to non-agricultural use, and there would be **no impact**.

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

No Impact. The Project site is within the City's Administrative and Professional Office (C-P) zone. As such, the site is not zoned for agricultural use. Additionally, the site is not under a Williamson Act contract and is not a suitable site for agricultural preservation. As such, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be **no impact.**

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

No Impact. The Project site does not contain forest land or timberland, nor is forest land or timberland present in the vicinity of the Project site. Additionally, the site is within the City's Administrative and Professional Office (C-P) zone. As such, the proposed Project would not conflict with zoning for forest land or timberland and **no impact** would occur.

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

No Impact. As described in Section 3.2(c), the Project site does not contain forest land. Therefore, the proposed Project would not result in the loss or conversion of forest land and **no impact** would occur.

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

No Impact. As described in Section 3.2(a) through (d), the Project site does not contain agricultural or forest land and would not convert agricultural or forest uses, and. **No impact** would occur.

References

CDOC (California Department of Conservation). 2022. California Important Farmland Finder. Accessed February 21, 2023. https://maps.conservation.ca.gov/DLRP/CIFF/.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less Than Significant Impact. The Project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Currently, the most recent approved SCAQMD AQMP is the 2022 AQMP (SCAQMD 2022), which was adopted by the SCAQMD Governing Board in December 2022. The SCAQMD 2022 AQMP was developed to address the attainment of the 2015 national 8-hour ozone ambient air quality standard (70 parts per billion) for the SCAB and Coachella Valley. The 2022 AQMP provides actions, strategies, and steps needed to reduce air pollutant emissions and meet the ozone standard by 2037.

The purpose of a consistency finding regarding the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2022 AQMP and if it would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- **Consistency Criterion No. 2:** Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, Project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A, Air Quality, Greenhouse Gas Emissions, and Energy Modeling Data. As presented

in Section 3.3(b), the Project would not generate construction or operational criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the Project would therefore be consistent with Criterion No. 1.

The second criterion regarding the potential of the Project to exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase is primarily assessed by determining consistency between the Project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2020). SCAQMD uses this document, which is based on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2022). The SCAG RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

As discussed in Section 1.4, the City of Covina General Plan designates the Project site with a "General Commercial" (GC) land use designation (City of Covina 2022). Permitted uses within a GC land use designation include various types of retail and service businesses; administrative, professional, and organizational offices that serve a diverse population; institutional uses, such as churches, group homes, nursing homes, and hospitals; utility and transportation facilities; automotive sales; automotive repair shops; gas stations; self-storage outlets; animal hospitals; and parking lots. The proposed Project would develop a digital billboard on an existing parcel that has already been developed. Installation of a billboard on this parcel would require approval of a zoning code amendment and amendments to the provisional and precise plan for the Village Oaks Office Park PCD area. However, with or without the proposed billboard installation, the Project site would remain in use for general commercial purposes, consistent with the existing land use designation. Further, since the proposed Project is not anticipated to result in residential population growth or generate an increase in employment that would conflict with existing employment-population projections, it would not conflict with or exceed the assumptions in the 2022 AQMP. Accordingly, the Project is consistent with the SCAG RTP/SCS forecasts used in development of the SCAQMD AQMP.

In summary, based on the considerations presented for the two criteria, impacts relating to the Project's potential to conflict with or obstruct implementation of the applicable AQMP would be **less than significant**.

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

Less Than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether the Project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[2] the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2022; EPA 2023). The SCAB is also designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO and NO_2 standards, as well as for state sulfur dioxide standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[3]

The Project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 3.3-1 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2019).

Table 3.3-1. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (Pounds per Day)**	**Operation (Pounds per Day)**
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (Project increment)	

2 An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the EPA and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

3 Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Table 3.3-1. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (Pounds per Day)**	**Operation (Pounds per Day)**
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2019.
Notes: VOC = volatile organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District.
Greenhouse gas (GHG) emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in this table as they are addressed within the GHG emissions analysis and not the air quality analysis.
[a] The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
[b] TACs include carcinogens and noncarcinogens.

The Project would result in a cumulatively considerable net increase for O_3, which is a nonattainment pollutant, if the Project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an O_3 significance threshold (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (i.e., VOCs and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) Version 2022.1.1.7[4] was used to estimate emissions from construction and operation of the Project. The following discussion quantitatively evaluates Project-generated construction and operational emissions and impacts that would result from implementation of the Project.

Construction Emissions

Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. Construction emissions can vary from day to day depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

[4] CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including residential, office and retail.

Emissions from the construction phase of the Project were estimated using CalEEMod default values. For the purpose of conservatively estimating Project emissions, construction was modeled beginning in October 2023[5] and lasting less than one month. The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate):

- New Billboard Construction: 1 week (October 2023)
- Landscaping: 1 week (October 2023)

Construction modeling assumptions for equipment and vehicles are provided in Table 3.3-2. Equipment mix and horsepower were based on CalEEMod default values, including equipment load factor. The Project may require the export of soils, which are expected to be removed from the site via haul truck during the billboard construction phase. For the analysis, it was assumed that heavy-duty construction equipment would be operating at the site 5 days per week.

Table 3.3-2. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Billboard Construction	24	18	16	Bore/Drill Rigs	1	4
				Cranes	2	6
				Tractors/Loaders/Backhoes	2	7
Landscaping	18	6	0	Concrete/Industrial Saw	2	8

Emissions generated during construction (and operation) of the Project are subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust, requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the portion of the Project site where active ground disturbance is occurring would be watered at least two times daily in compliance with requirements of SCAQMD standard dust control measures in Rule 403. The application of architectural coatings, such as paint and other finishes, would also produce VOC emissions; however, the contractor is required to procure architectural coatings that comply with the requirements of SCAQMD's Rule 1113, Architectural Coatings (SCAQMD 2016).[6]

Table 3.3-3 shows the estimated maximum daily construction emissions associated with the construction phase of the Project.

5 October 2023 has passed, and in practice, construction is anticipated to begin in late 2024 or early 2025. However, using an earlier start date for construction represents a worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. As such, while October 2023 has passed, it has been retained as the construction date for the purposes of this analysis to yield conservative results.

6 SCAQMD Rule 1113, Architectural Coatings, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
2023	1.32	11.7	11.9	0.03	1.18	0.58
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect control of fugitive dust required by SCAQMD Rule 403.

As shown in Table 3.3-3, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during Project construction, and short-term construction impacts would be **less than significant**.

Operational Emissions

Emissions from the operational phase of the Project were estimated using CalEEMod. Operational year 2024 was assumed as the first potential year of operations.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use and architectural coatings. Area source emissions from landscaping from lawn mowers, blowers and other equipment were assumed to be consistent with existing conditions at the site and were therefore not captured in emissions inventory.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gases (GHGs) in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site. The proposed Project would not include any natural gas emissions sources such as hot water heaters or boilers. Therefore, no criteria air pollutant emissions from energy sources are anticipated for the proposed Project.

Mobile Sources

To quantify emissions associated with Project operational mobile sources, one trip a month was assumed for maintenance of the digital billboard which is based on information provided by the Project applicant.[7] Project-related traffic was assumed to include a mixture of vehicles consistent with CalEEMod default vehicle fleet assumptions. Emission factors for 2024 (the first potential year of project operation) were used to estimate emissions associated with full buildout of the Project.

[7] Maintenance of the billboard is generally expected to occur once every two months; however, additional maintenance activities may be required in the event of inclement weather. As such, monthly maintenance activities throughout the year have been assumed for the air quality, energy, and GHG calculations to ensure conservative analysis.

Table 3.3-4 presents the maximum daily emissions associated with operation of the Project in 2024. The values shown are the maximum summer and winter daily emissions results from CalEEMod. Complete details of the emissions calculations are provided in Appendix A.

Table 3.3-4. Estimated Maximum Daily Operation Criteria Air Pollutant Emissions

Emissions Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Proposed Project						
Area	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	<0.01	<0.01	0.03	<0.01	<0.01	<0.01
Total Operational	**<0.01**	**<0.01**	**0.03**	**<0.01**	**<0.01**	**<0.01**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; <0.01 = reported value less than 0.01.
See Appendix A for complete results.

As shown in Table 3.3-4, maximum daily operational emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ generated by the Project would not exceed the SCAQMD's significance thresholds, and long-term operational impacts would be less than significant.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. However, as indicated in Tables 3.3-3 and 3.3-4, Project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.

Therefore, the Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be **less than significant** during construction and operation.

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

Less Than Significant Impact. The Project would not expose sensitive receptors to substantial pollutant concentrations, as evaluated below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include sites such as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive receptors is Jalapa Park which is located approximately 350 feet northeast of the Project work area.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of a project as a result of project activities. The impacts of the proposed Project were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). Maximum daily emissions would be generated during the billboard construction phase. The Project site is 1.64 acres; however, only a small portion of the site would undergo disturbance during construction of the billboard. To provide a conservative analysis, the thresholds for a one-acre project site were utilized. The Project is located within Source-Receptor Area 9 (East San Gabriel Valley). This analysis applies the SCAQMD LST values for a 1-acre site within Source-Receptor Area 9 with a receptor distance of 100 meters (328 feet), which is the closest available distance, relative to the distance between the Project work area and Jalapa Park (350 feet), provided in the SCAQMD's methodology.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2009). Trucks and worker trips associated with the Project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be brief in nature and would cease once the vehicles pass through the main streets. Off-site emissions from truck trips were limited to 1,000 feet of estimated on-site activity within the LST analysis. The maximum daily on-site emissions generated by construction of the Project are presented in Table 3.3-5 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 9 to determine whether Project-generated on-site emissions would result in potential LST impacts.

Table 3.3-5. Construction Localized Significance Thresholds Analysis

	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day (On Site)			
Maximum	*11.7*	*11.9*	*1.18*	*0.58*
SCAQMD LST Criteria[a]	*159*	*1,914*	*34*	*9*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2009; Appendix A.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
Maximum on-site emissions occurred during the overlap of the following phases: grading and site preparation.
[a] LST are shown for a 1-acre disturbed area corresponding to a distance to a sensitive receptor of 100 meters in Source-Receptor Area 9 (East San Gabriel Valley).

As shown in Table 3.3-5, proposed construction activities would not generate emissions more than site-specific LSTs for NO_x, CO PM_{10} and $PM_{2.5}$. Thus, impacts would be **less than significant**.

Carbon Monoxide Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO

concentrations are associated with severely congested intersections. Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. The proposed Project would generate less than one monthly trip associated with maintenance of the billboard, therefore, traffic congestion would not be substantially altered or affected by the Project.

At the time that the SCAQMD Handbook (SCAQMD 1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS because of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[8] (SCAQMD 2003b) for the four worst-case intersections in the SCAB:

1. Wilshire Boulevard and Veteran Avenue
2. Sunset Boulevard and Highland Avenue
3. La Cienega Boulevard and Century Boulevard
4. Long Beach Boulevard and Imperial Highway

At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 parts per million at the Sunset Boulevard and Highland Avenue intersection in 2002 and the maximum 8-hour CO concentration was 3.4 parts per million at the Wilshire Boulevard and Veteran Avenue in 2002.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the Project is not anticipated to increase daily traffic volumes at any intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur.

Based on these considerations, the Project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. This conclusion is supported by the analysis in Section 3.17, which demonstrates that traffic impacts would be less than significant. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the Project would result in a **less-than-significant impact** to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

TACs are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health.

8 SCAQMD's CO hotspot modeling guidance has not changed since 2003.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some TACs have noncarcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) noncarcinogenic effects.[9] TACs that would potentially be emitted during construction activities associated with the Project would be diesel particulate matter (DPM).

DPM emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. PM_{10}, and $PM_{2.5}$ (representative of DPM) exposure would be minimal. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should also be limited to the period/duration of activities associated with the Project. The duration of the proposed construction activities would constitute a small percentage of a total 30-year exposure period. The construction period for the Project would be approximately 2 weeks, after which construction-related TAC emissions would cease. Therefore, due to the relatively short period of exposure (2 weeks), minimal diesel particulate emissions on site, and distance from sensitive receptors, TACs generated during construction are not expected to result in concentrations causing significant health risks.

Following completion of on-site construction activities, the Project would not involve routine operational activities that would generate TAC emissions. Operation of the Project would not result in any non-permitted direct emissions such as an on-site generator or off-road equipment. For these reasons, the Project would not result in substantial TAC exposure to sensitive receptors, and impacts would thus be **less than significant**.

Health Effects of Criteria Air Pollutants

Construction and operation of the Project would generate criteria air pollutant emissions; however, estimated construction and operational emissions would not exceed the SCAQMD mass-emission daily thresholds as shown in Tables 3.3-3 and 3.3-4, respectively. As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2023). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Because construction and

[9] Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various noncarcinogens from the Project to published reference exposure levels that can cause adverse health effects.

operation of the Project would not result in O_3 precursor emissions (i.e., VOCs or NO_X) that would exceed the SCAQMD thresholds, as shown in Tables 3.3-3 and 3.3-4, the Project is not anticipated to substantially contribute to regional O_3 concentrations and their associated health impacts.

Health effects associated with NO_x and NO_2 include lung irritation and enhanced allergic responses (CARB 2023). Construction and operation of the Project would not generate NO_x emissions that would exceed the SCAQMD mass daily thresholds; therefore, construction and operation of the Project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 or contribute to associated health effects. In addition, the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2, and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2023). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less-than-significant impact. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM_{10} and $PM_{2.5}$ include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2023). As with O_3 and NO_X, and as shown in Tables 3.3-3 and 3.3-4, the Project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the Project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related health effects for this pollutant.

In summary, construction and operation of the Project would not result in exceedances of the SCAQMD significance thresholds for criteria pollutants, and potential health effects associated with criteria air pollutants would be less than significant.

In addition, an analysis of the Project's potential to exceed the SCAQMD LSTs is presented above. The SCAQMD developed the LST analysis in response to CARB Governing Board's Environmental Justice Enhancement Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS (which are health protective standards) at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area, project size, and distance to the nearest sensitive receptor. LSTs has been developed for NO_2, CO, PM_{10}, and $PM_{2.5}$. As presented above, the Project's localized construction emissions would not exceed site-specific LSTs. Therefore, impacts would be **less than significant**.

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

Less Than Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Construction could generate odors from vehicles and/or equipment exhaust emissions. Potential odors produced would be primarily attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors would disperse rapidly and would occur at magnitudes that would not affect substantial numbers of people Additionally, the proposed Project

does not include demolition of older buildings which may have included asbestos or lead in their building design. Therefore, impacts associated with odors and other emissions during construction would be **less than significant**.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project entails operation of a billboard and would not result in the creation of a land use that is commonly associated with odors. Therefore, **no impact** would occur during Project operations.

References

CARB (California Air Resources Board). 2022. "Area Designation Maps/State and National." Last updated. November 2022. http://www.arb.ca.gov/desig/adm/adm.htm.

CARB. 2023. "Common Air Pollutants. Accessed April 2023. https://ww2.arb.ca.gov/resources/common-air-pollutants.

EPA (U.S. Environmental Protection Agency). 2023. "Nonattainment areas for Criteria Air Pollutants." Last updated March 31, 2023. https://www.epa.gov/green-book

OEHHA (Office of Environmental Health Hazard Assessment). 2015. Air Toxics Hot Spots Program. Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. February 2015. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

SCAG (Southern California Association of Governments). 2020. Connect SoCal: The 2040-2045 Regional Transportation Plan/ Sustainable Communities Strategy of the Southern California Association of Governments. May 7, 2020. Accessed July 2020. https://www.connectsocal.org/ Documents/Adopted/fConnectSoCal-Plan.pdf.

SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook.

SCAQMD. 2003a. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/ cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2.

SCAQMD. 2003b. Final 2003 AQMP Appendix V Modeling and Attainment Demonstrations. August 2003. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/ 2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=2.

SCAQMD. 2009. Final Localized Significance Threshold Methodology. Revised July 2009.

SCAQMD. 2016. Rule 1113. Architectural Coatings. Accessed January 2023. http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24SCAQMD. 2018. "SCAQMD Modeling Guidance for AERMOD." Accessed April 2018. http://www.aqmd.gov/home/air-quality/air-quality-data-studies/ meteorological-data/modeling-guidance.

SCAQMD. 2019. "SCAQMD Air Quality Significance Thresholds." Originally published in CEQA Air Quality Handbook, Table A9-11-A. Revised April 2019. http://www.aqmd.gov/docs/default-source/ceqa/ handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

SCAQMD. 2022. 2022 Air Quality Management Plan. Accessed January 2023. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

No Impact. Based on an electronic database review of the California Natural Diversity Database (CNDDB), there are 108 special status wildlife species, 76 special status plant species, and nine sensitive habitats with recorded occurrences in the U.S. Geologic Survey's 7.5-minute quadrangles on which the Project site is located on and surrounded by (CDFW 2022). These 7.5-minute quadrangles include the San Dimas, Baldwin Park, Ontario, Mt. Baldy, Glendora, Azusa, La Habra, Yorba Linda, Prado Dam quadrangles.

While some special status species are known to occur in the Project area and surrounding region, the Project site and surrounding areas are developed under existing conditions and are located within an urban setting dominated by development and ornamental landscaping. As such, no special status species are expected to occur on the Project site or in the immediate vicinity of the Project site, due to the absence of suitable habitat. As such, **no impact** to special-status species is expected to occur.

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

No Impact. The Project site is developed with a paved parking lot, an office building, and landscaping. There are no riparian habitat areas located on or within the immediate vicinity of the Project site (USFWS 2023). The vegetation on the Project site consists of ornamental trees, shrubs, and turf that do not constitute a sensitive natural community. The nearest potential riparian area is a forested drainage located approximately 0.2 miles west of the Project site (USFWS 2023). The Project site is separated from this drainage by urban development, including the I-10 freeway and residential structures. Due to the distance and intervening development, the Project would not adversely affect this drainage. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and there would be **no impact.**

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

No Impact. There are no wetlands located on or adjacent to the Project site (USFWS 2023). The nearest bodies of water are a forested drainage located approximately 0.2 mile west of the Project site (described above under Section 3.4(b)) and a series of freshwater wetlands approximately 0.4 mile southeast of the Project site (USFWS 2023). The Project site is separated from these areas by urban development, including the I-10 freeway. Therefore, the Project would not have a substantial adverse effect on state or federally protected wetlands, and there would be **no impact.**

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

Less Than Significant Impact with Mitigation Incorporated. There are no wetland or water bodies within the Project site. As such, the Project would have no potential to affect the movement of migratory fish. The Project

site does contain landscaping, including several trees located near the site of the proposed billboard. The Project may require the removal or trimming of some of the on-site trees. While these vegetated areas could potentially support wildlife, they are not connected with other naturalized corridors or habitat areas. Rather, these stands of trees are isolated from other naturalized areas and potential habitat by the I-10 freeway to the west, commercial development to the north, and existing roadways to the east and south. As such, the trees on the Project site have limited function as wildlife corridors. Therefore, the implementation of the Project would not interfere with wildlife corridors. The trees on the Project site, however, could provide potential nesting sites for birds and raptors, which are protected under Section 3503, 3503.5, and 3513 of the Fish and Game Code and under the Migratory Bird Treaty Act. Tree removal and other construction activities could negatively affect individual birds that are nesting on the Project site. In the event that one of the trees planned for trimming or removal are being used as a nesting site by a native bird, the removal of the tree could affect or kill the bird. Construction activities would also elevate noise levels and could cause disturbance to protected bird species nesting on the Project site. Should construction of the Project occur during breeding, reproduction, or juvenile nesting periods for nesting birds and raptors (i.e., between February 15 and August 31), the construction activities associated with the Project would have the potential to negatively affect nesting birds or raptor species, which would be a significant impact under CEQA. Implementation of **MM-BIO-1** would reduce this impact to below a level of significance.

During Project operations, the new billboard would result in an incremental increase in the ambient lighting conditions at the Project site and its surroundings. Additional sources of light have the potential to affect wildlife movement and behavior, particularly when introduced to an environment that is otherwise devoid of artificial lighting sources. However, the billboard would be surrounded by urban development that contains many sources of light, including residential uses, commercial uses, and traffic. As such, the proposed billboard would not substantially increase the light in the Project area when compared to existing conditions to the extent that wildlife movement or behavior would be adversely affected. Therefore, the light emitted from the billboard would not result in a substantial adverse impact to nesting birds. In addition, any vegetation that is removed during construction would be replaced with additional landscaping. While several trees may be permanently removed as part of the Project, numerous other trees would remain available on the Project site and within the immediate vicinity, providing similar nesting habitat. As such, the Project site would continue to provide potential nesting sites in an urban environment, consistent with existing conditions. Therefore, operational impacts would be less than significant and construction impacts would be **less than significant with mitigation incorporated.**

MM-BIO-1 Nesting Birds

Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (February 15 through August 31), to reduce any potential significant impact to birds that may be nesting on the Project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey must be conducted for protected migratory birds, raptors, and active nests. A qualified biologist shall survey the construction zone and a 250-foot radius surrounding the construction zone in areas that are accessible visually. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code.

If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no disturbance buffer, which will be determined by the

biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

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

No Impact. The Project site contains several trees, including eucalyptus, palm, and coniferous trees. As previously discussed, the Project may require the removal and/or trimming of up to two on-site trees. Chapter 11.36 of the City's Municipal Code sets forth protections for street trees within the City. According to Section 11.36.040 of the City's Municipal Code, it is unlawful to remove or damage any trees that are located within a public right-of-way without first obtaining a permit from the City. In addition, Chapter 17.83 of the City's Municipal Code sets forth the provisions of the City's Tree Preservation Ordinance. This ordinance prohibits the removal or damaging of designated heritage trees within the City. According to Section 17.83.020 of the City's Municipal Code, heritage trees are defined as all species of oak tree and any individual tree or groups of trees that have been specifically designated as heritage trees by the City Council. The trees that would be removed and/or trimmed during Project construction are not street trees or heritage trees, as defined by the City's Municipal Code. As such, the Project would not conflict with any local policies or ordinances protecting biological resources. There would be **no impact.**

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The City's General Plan does not designate any areas of the City as being located within a habitat conservation plan (City of Covina 2000). Additionally, the City is not located within any regional conservation plans designated by the state (CDFW 2019). Therefore, the implementation of the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be **no impact.**

References

CDFW (California Department of Fish and Wildlife). 2019. California Natural Community Conservation Plans. April 2019. Accessed April 4, 2023. https://www.wildlife.ca.gov/Conservation/Planning/NCCP.

CDFW. 2022. California Natural Diversity Database: RareFind 5; records of occurrence for USGS 7.5- minute Quadrangle maps: San Dimas, Baldwin Park, Ontario, Mt. Baldy, Glendora, Azusa, La Habra, Yorba Linda, Prado Dam. Accessed March 30, 2023. https://apps.wildlife.ca.gov/rarefind/view/RareFind.aspx.

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

USFWS (United States Fish and Wildlife Service). 2023. National Wetlands Inventory. Accessed April 4, 2023. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper.

3.5 Cultural Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	**CULTURAL RESOURCES** – Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

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

No Impact. The proposed Project would not involve demolition or alteration of structures. As such, direct effects to historic built environment resources would not result from the Project. However, the proposed billboard would introduce a new built environment feature on the Project site, having the potential to result in indirect effects to historical resources, in the event that any were present on the site or in the immediate vicinity. However, the office building that is currently on the Project site was constructed in 1985, according to information on file at the Los Angeles County Office of the Assessor (Los Angeles County 2023). This building is not over 45 years of age and, therefore, does not meet the age threshold for consideration under the National Register of Historic Places or California Register of Historical Resources, or for local designation. Therefore, the introduction of a billboard at this property would not result in a significant effect to on-site historical built environment resources, since none are present. As demonstrated in the records search conducted for the Project site and vicinity (described further in Section 3.5(b), below), there are no known historic built environment resources within the immediate Project surroundings. Specifically, the Project site's immediate surroundings consist of a hotel building to the northwest (constructed in 1980 and thus not of historic age), a City park to the northeast, a commercial building to the east (constructed in 1985 and thus not of historic age), and the I-10 freeway to the south (Los Angeles County 2023). None of these built environment features are designated historic resources. For these reasons, implementation of the proposed billboard is not anticipated to have an indirect effect to historical built environment resources. As such, effects to historical built environment resources are not anticipated, and **no impact** would occur. (Historical archaeological resources are addressed in Section 3.5(b)).

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

Less Than Significant Impact with Mitigation Incorporated. A California Historical Resources Information System (CHRIS) records search was conducted for the Project site and a 1.0-mile radius around the Project site at the South Central Coastal Information Center (SCCIC), located on the campus of California

State University, Fullerton on March 13, 2023. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources include historical maps of the study area, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. SCCIC records indicate that no previously recorded cultural resources exist within or adjacent to the proposed Project site.

Dudek contacted the Native American Heritage Commission (NAHC) on March 3, 2023, and requested a review of their Sacred Lands File (SLF) as part of the process of identifying cultural resources within or near the Project site. The NAHC replied via email on May 24, 2023, stating that the results of the SLF search were negative. All tribal coordination was completed by the City pursuant to Assembly Bill (AB) 52. See Section 3.18, Tribal Cultural Resources, for more information.

Based on the research described above, there are no known archaeological resources on the Project site or in the vicinity of the Project site; therefore, there are no significant or unique archaeological resources that Project implementation may have the potential to adversely change.

The proposed Project would involve a minimal area of ground disturbance to construct the billboard foundation (which would be approximately 5–6 feet wide and would extend to a depth of approximately 30–35 feet below ground surface). However, ground disturbance would occur on a lot that has already undergone grading and ground disturbance, associated with the existing office building, surface parking lot, and ornamental landscaping. As such, it is anticipated that the area of proposed ground disturbance has already undergone disturbance in the past, which reduces the likelihood that previously undiscovered intact archaeological deposits with the potential to meet the criteria of significance in accordance with CEQA Guidelines Section 15064.5 would be discovered during construction of the proposed Project within disturbed soils. However, due to the anticipated depth of the pole foundation for the billboard (30–35 feet below grade), excavation could extend into previously undisturbed soils where, if archaeological resources were present, such resources would have a higher likelihood of retaining their provenience.

Nevertheless, due to the absence of known archaeological resources on the Project site or in the Project area, the minimal amount of proposed ground disturbance, and the previously disturbed nature of the Project site, the likelihood of encountering previously undiscovered, buried archaeological resources is low, and no discoveries are anticipated. However, there is always some potential for a previously undiscovered resource, with the potential to meet the criteria of significance per CEQA Guidelines Section 15064.5, to be encountered during excavation. If such resources were to be uncovered but not properly treated, they could be destroyed or damaged, resulting in a potentially significant impact. As such, **MM-CUL-1** is set forth to reduce impacts to below a level of significance, in the unlikely event of an unanticipated archaeological find. Incorporation of **MM-CUL-1** would ensure that any unanticipated significant discoveries are protected to the extent required by law. Impacts from the proposed Project would thus be **less than significant with mitigation incorporated**.

MM-CUL-1 Unanticipated Archaeological Finds

In the event that archaeological resources (sites, features, or artifacts) are unearthed during ground-disturbing activities associated with the proposed Project, the contractor shall cease all earth-disturbing activities within 50 feet of the discovery and shall retain a

qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards. The archaeologist shall evaluate the significance of the find and determine whether or not additional study is warranted. Construction activities may continue in other areas. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5(f); California PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, data recovery, and/or monitoring may be warranted.

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

Less Than Significant Impact with Mitigation Incorporated. No known burials including those interred in a formal cemetery or those interred outside of formal cemeteries exist within the Project site or within close proximity of the Project site. However, there is always some potential for a previously undiscovered burial or a previously disturbed but unreported burial to be encountered during excavation. As discussed in Section 3.5(b), the proposed Project would involve minimal ground-disturbing activities. In the unlikely event that excavation activities during construction inadvertently uncover buried human remains, implementation of **MM-CUL-2** would reduce potential impacts below a level of significance. Impacts would therefore be **less than significant with mitigation incorporated**.

MM-CUL-2 Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found the contractor shall cease all earth-disturbing activities within no less than 100 feet of the discovery, immediately notify the County Coroner, and contact a qualified archaeologist. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent shall complete their inspection within 48 hours of being granted access to the site. The most likely descendent would then determine, in consultation with the property owner, the disposition of the human remains. Upon discovery, a qualified archaeologist will be retained to ensure proper implementation of the treatment agreed upon by the most likely descendant and property owner.

References

Los Angeles County. 2023. Property Assessment Information System. Accessed April 14, 2023. https://maps.assessor.lacounty.gov/m/.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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

Less Than Significant Impact. The short-term construction and long-term operation of the proposed Project would require the consumption of energy resources in several forms at the Project site and within the Project area. Construction and operational energy consumption for the proposed Project is evaluated in detail below.

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment would be provided by Southern California Edison. Any electricity used for construction activities would be temporary, would be substantially less than that required for Project operation, and would have a negligible contribution to the Project's overall energy consumption. Therefore, impacts to electricity resources during construction would be **less than significant.**

Natural Gas

Natural gas is not anticipated to be required during construction of the Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the Petroleum subsection. Any minor amounts of natural gas that may be consumed as a result of Project construction would have a negligible contribution to the Project's overall energy consumption. Therefore, impacts to natural gas resources during construction would be **less than significant**.

Petroleum

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel. Construction workers would travel to and from the Project site throughout the duration of construction. It is

assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during Project construction. Appendix A lists the assumed equipment usage for each phase of construction. Energy calculations are also included in Appendix A.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Construction is estimated to occur in 2023 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2021). The estimated diesel fuel usage from construction equipment is shown in Table 3.6-1.

Table 3.6-1. Project Construction Petroleum Demand

Phase	Off-Road Equipment (diesel)	Trucks (diesel)	Worker Vehicles (gasoline)
	gallons		
Construction	678	48	37
		Total Petroleum Consumed	**763**

Notes: See Appendix A for details.

In summary, construction of the Project is anticipated to consume 37 gallons of gasoline and 727 gallons of diesel over the course of two weeks. The Project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology (BACT) requirements. The Project is also located in an urban area and worker, vendor, and haul truck trip lengths would be shorter compared to a rural project location, resulting in less energy use. Therefore, impacts to petroleum resources during construction would be **less than significant**.

Operation

Electricity and Natural Gas

The operation of the Project would require electricity for powering of the digital billboard. Electricity consumption associated with Project operation is based on the CalEEMod outputs and energy calculations presented in Appendix A.

Energy demand information associated with the Project from powering of the digital billboard was provided by the Project applicant. According to these estimations, the Project would consume approximately 64,800

kWh per year. For context, within the County of Los Angeles, non-residential energy demand was 4,438 million kilowatt hours in 2021 (CEC 2023). Therefore, the Project would represent a minimal increase in demand compared to the existing energy demand within the County of Los Angeles. The digital billboard display would also utilize high efficiency LEDs. Therefore, electricity use related to the Project would not be wasteful, inefficient, or unnecessary and impacts related to operational electricity would be **less than significant**.

Natural gas consumption is not anticipated to be required during operation of the Project. The Project consists of construction and operation of a digital billboard and would not include on-site sources that require natural gas for fuel. Therefore, there would be **no impact** related to operational natural gas use.

Petroleum

Petroleum fuel consumption associated with motor vehicles traveling to and from the Project site is a function of the vehicle miles traveled as a result of Project operation. As shown in Appendix A the annual vehicle miles traveled attributable to the Project is expected to be 2,650 miles. Similar to the construction worker and vendor trips, fuel consumption from worker and truck trips are estimated by converting the total CO_2 emissions from operation of the Project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Mobile source fuel demand was estimated to be 860 gallons of gasoline per year based on the Project's one MT CO_2e per year.

Statewide emission reduction measures proposed in the CARB-adopted amendments to the Pavley regulations include measures aimed at reducing GHG emissions associated with transportation. CARB has adopted a new approach to passenger vehicles—cars and light trucks—by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. This approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emission vehicles in California (CARB 2017).

In summary, although electricity usage would increase due to the implementation of the Project, the Project would be subject to the State Building Energy Efficiency Standards, which would ensure that electricity is being used as efficiently as practicable. Although the Project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum over time due to advances in fuel economy. Therefore, impacts to energy resources during operation would be **less than significant**.

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

Less Than Significant Impact. The Project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings constructed in California to reduce energy demand and consumption. The digital billboard display would comply with the California code requirements for energy efficiency.

Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the Project under the California Green Building Standards. California Green Building Standards institute mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The proposed Project would meet all applicable California Green Building Standards.

The City's Energy Action Plan (EAP) demonstrates the City's commitment to pursue energy efficiency and reduce GHGs across the community and municipal operations (City of Covina 2012). The Project would be consistent with the EAP since the Project would be designed using a high efficiency LED display. For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be **less than significant**.

References

CARB. 2017. The 2017 Climate Change Scoping Plan Update—The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. January 20, 2017. Accessed April, 2023. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

California Energy Commission (CEC). 2023. Electricity Consumption by County. Accessed April 2023. http://www.ecdms.energy.ca.gov/elecbycounty.aspx.

City of Covina. 2012. *City of Covina Energy Action Plan*. December 2012. Accessed April 2023. https://covinaca.gov/sites/default/files/fileattachments/public_works/page/584/covina-eap-december-2012_final.pdf.

The Climate Registry. 2021. "Default Emission Factors." April. https://www.theclimateregistry.org/wp-content/uploads/2021/04/The-Climate-Registry-2021-Default-Emission-Factor-Document.pdf.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. According to maps produced by the state, the Project site does not lie within an Alquist-Priolo Earthquake Fault Zone (CGS 2022). Thus, the potential for fault rupture on the Project site is low. Furthermore, the construction and operation of the proposed billboard would not increase the probability or exacerbate the potential for fault rupture to occur. Therefore, the Project is not expected to result in substantial adverse effects, including the risk of loss, injury, or death, involving rupture of a known earthquake fault. There would be **no impact.**

ii) Strong seismic ground shaking?

Less Than Significant Impact. As with most of Southern California, the Project site could be subject to seismic ground shaking. The nearest active faults to the City include the Sierra Madre and Duarte and Lower Duarte faults, which are located approximately between two and four miles north of the City (City of Covina 2000). A significant earthquake originating along any of these, or other regional faults, could pose a hazard to buildings and people in the City.

In the event of strong seismic ground shaking on the Project site, the proposed billboard structure would have the potential to undergo seismic damage, as is the case with surrounding buildings and structures. The Project, however, would be designed and constructed in accordance with existing federal, state, and

City laws and guidelines concerning seismic safety, thereby ensuring maximum feasible stability of the proposed billboard. Additionally, the Project would not introduce new habitable structures the Project site, nor would it change the existing use of the site. Additionally, the Project would not result in an increase in the probability or exacerbate the potential for strong seismic ground shaking to occur. Therefore, upon compliance with seismic safety regulations, the Project's impacts associated with strong seismic ground shaking would be **less than significant.**

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon that occurs when water-laden, loose and cohesionless soils are subject to intense seismic shaking and form a fluid-like soils condition below the ground surface. As a result, structural damage may occur as building foundations lose ground support. A portion of the City's southeast corner, including the Project site, is located within a liquefaction zone (CGS 2022). In the event that seismic-related ground failure were to occur on the Project site, the proposed billboard structure would have the potential to undergo damage. As previously discussed, however, the Project would be designed and constructed in accordance with existing federal, state, and City laws and guidelines concerning seismic safety, thereby ensuring maximum feasible stability of the billboard structure. Additionally, the Project would not introduce habitable structures to the Project site such that it would expose more people to seismic-related ground failure risks. Furthermore, the Project would not increase the probability or exacerbate the potential for seismic-related ground failure to occur. Upon compliance with seismic safety regulations, Project impacts associated with seismic-related ground failure, including liquefaction, would be **less than significant.**

iv) Landslides?

Less Than Significant Impact. The Project site is not located in an area that is identified as being susceptible to earthquake-induced landslides (CGS 2022). The nearest area that is susceptible to earthquake-induced landslides is located approximately 0.3 miles east of the Project site (CGS 2022). This area, however, is separated from the Project site by existing development, including residential uses, commercial uses, and East Holt Avenue. As such, if a landslide were to occur in this area, the existing development within the Project area would likely preclude the landslide from reaching the Project site. Additionally, the Project site is relatively flat and does not contain significant slopes. The majority of the site is developed with an office building and surface parking lot and contains minimal areas with exposed soils. The only excavation that would be required for the Project would be excavation for the billboard pole structure. As such, the construction of the Project would not result in the potential for exposed slopes on the Project site. Furthermore, the Project would be required to comply with the California Building Code, which outlines specific design, engineering, and development standards for structures and would ensure maximum feasible stability of the billboard structure. The implementation of the Project would not increase the probability or exacerbate the potential for landslides to occur. Therefore, upon compliance with applicable regulations, including the California Building Code, the Project's impacts associated with landslides would be **less than significant.**

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

Less Than Significant Impact. In an urbanized setting, substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed and the soils are washed away during a storm or wind event. Proposed project construction would cause minor amounts of ground disturbance on the Project site

associated with installation of the billboard foundation and structure. These construction processes may cause temporary soil exposure. However, this process would not expose substantial amounts of the underlying soil. Specifically, installation of the billboard foundation would involve excavating a hole between 5 feet and 6 feet in diameter to a depth of approximately 30 feet to 35 feet within an area of the site that contains landscaping under existing conditions. No large areas of exposed soils subject to erosion would be created as a result of Project implementation. Additionally, in compliance with Section 8.50.100 of the City's Municipal Code, the Project applicant would be required to prepare and submit an erosion and sediment control plan, which would establish best management practices (BMPs) that the Project would be required to abide by during construction to control erosion and sediment. As such, impacts associated with soil erosion or loss of topsoil would be **less than significant.**

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

Less Than Significant Impact. As described above, the Project site could be susceptible to soils hazards, such as liquefaction. In the event that soil instability were to occur at the Project site, the billboard structure would have the potential to undergo damage. However, the Project would be designed and constructed in compliance with existing federal, state, and City laws and guidelines concerning geologic safety, including the California Building Code, which outlines specific design, engineering, and development standards for structures. Compliance with the applicable regulations would ensure maximum feasible stability of the billboard structure. Ground disturbance involved with the proposed Project would consist of excavation for the billboard foundation and pole structure. As such, ground disturbance would be generally limited; however, excavation for the billboard pole structure would require a deep hole (30 to 35 feet deep), which could lead to temporary soil instability during excavation of the hole. However, the construction contractor would be required to adhere to state and local requirements establishing safe construction and excavation practices, which would ensure that any temporary soil instability would be minimized to the extent practicable. For these reasons, the proposed Project is not expected to result in substantial hazards related to soil instability. Furthermore, implementation of the proposed Project would not increase the probability or exacerbate the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse to occur. Upon compliance with seismic safety regulations and standard construction requirements for excavation, impacts related to soil hazards associated with implementation of the proposed Project would be **less than significant**.

d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Less Than Significant Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. According to the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the Project site is underlain by Urban land-Azuvina-Montebello complex, 0 to 5 percent slopes (NRCS 2023). The profile of this soil unit includes loam, clay loam, sandy clay loam, and fine sandy loam (NRCS 2023). As such, soils with clay components are present in the Project area, and the Project site could thus be potentially subject to soil expansion hazards. The Project, however, would be designed and constructed in compliance with existing federal, state, and City laws and guidelines associated with geotechnical hazards. This includes the California Building Code, which outlines specific design, engineering, and development standards concerning structural safety, thereby ensuring maximum feasible stability of the new billboard structure. The proposed Project would

also not increase the number of habitable structures or building occupants potentially exposed to hazards associated with soil expansion. Furthermore, implementation of the proposed Project would not increase the probability or exacerbate the potential for soil expansion to occur. As such, impacts associated with expansive soils would be **less than significant.**

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project consists of the development of a billboard structure. The Project would not include installation of septic tanks or alternative wastewater disposal systems. As such, there would be **no impact.**

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

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources are the remains or traces of plants and animals that are preserved in earth's crust, and per the Society of Vertebrate Paleontology (SVP) 2010 guidelines, are older than written history or older than approximately 5,000 years. They are limited, nonrenewable resources of scientific and educational value, which are afforded protection under state laws and regulations.

The Project site is located within the northern Peninsular Ranges geomorphic province (CGS 2002; Harden 2004). This geomorphic province is characterized by northwest trending mountain ranges and valleys that extend over 900 miles from the tip of the Baja California Peninsula to the Transverse Ranges (e.g., the San Bernardino and San Gabriel Mountains in southern California). Regionally, the Peninsular Ranges are bounded to the east by the Colorado Desert and the west by the continental shelf and offshore islands (Santa Catalina, Santa Barbara, San Nicholas, and San Clemente) (CGS 2002; Harden 2004). Regional mountain ranges in the Peninsular Ranges geomorphic province include the Santa Ana, San Jacinto, and Santa Rosa Mountains. Geologically, these mountains are dominated by Mesozoic, plutonic igneous and metamorphic rocks that are part of the Peninsular Ranges batholith (Southern California batholith) (Jahns 1954; Harden 2004).

More specifically, surficial geological mapping at a 1:24,000 scale indicates the Project site is underlain by Holocene (less than 11,700 years old) alluvial deposits (map unit Qa) associated with a generally east-west trending drainage (Dibblee and Minch 2002; Cohen et al. 2022). Given these deposits are located within the drainage, they are likely late Holocene (less than 4,200 years old) in age. Pleistocene (approximately 11,700 years ago to 2.58 million years ago) alluvial deposits (map unit Qoa) are mapped on the northern Project site boundary (Dibblee and Minch 2002; Cohen et al. 2022).

A paleontological records search was requested from the Natural History Museum of Los Angeles County (LACM) for a project very near the current Project site and underlain by the same geological units (LACM 2018). Therefore, this analysis relies on the results from that records search. The closest Pleistocene vertebrate fossil locality, LACM 1807, is located near Arrow Highway and Irwindale Avenue, north of Dalton Wash. The locality yielded a fossil mastodon (*Mammut americanum*) from a gravel pit at a depth of 115-120 feet below the ground surface (bgs). LACM 8014 produced a fossil bison (*Bison*) near the intersection of the Riverside Freeway (Highway 60) and the Corona Freeway (Highway 71) near the surface (LACM 2018). The next closest locality reported by the LACM, LACM 1728, is farther to the east-southeast and

west of Chino. LACM 1728 produced fossil specimens of horse (*Equus*) and camel (*Camelops*) at a depth of 15 to 20 feet bgs.

The late Holocene alluvial deposits present within the majority of the Project site have not been shown to produce any fossil resources and therefore have low paleontological resources sensitivity, but the sensitivity becomes higher at depth as the sediments become older. Artificial fill, if present, also has low paleontological sensitivity. Undisturbed Pleistocene alluvial deposits, mapped on the northern boundary of the Project site, have high paleontological sensitivity throughout their stratigraphic extent. Ground disturbance associated with excavation for the billboard pole is limited to the southwest corner of the Project site, where the contact between Holocene and Pleistocene alluvial deposits is mapped.

No paleontological resources were identified within the Project site as a result of the institutional records search or desktop geological and paleontological review. In addition, the Project site is not anticipated to be underlain by unique geologic features. If intact paleontological resources are located on site, ground-disturbing activities associated with construction of the Project, such as excavation for the pole foundation, would have the potential to destroy a unique paleontological resource or site. As such, the Project site is considered to be potentially sensitive for paleontological resources at depth, and without mitigation, the potential damage to paleontological resources during construction associated with the Project is considered a potentially significant impact. Given the proximity of past fossil discoveries in the surrounding area within Pleistocene deposits and the proximity of Pleistocene deposits to the proposed area of ground disturbance, the Project site is considered highly sensitive for supporting paleontological resources below the depth of fill (if present), below a depth of five feet below the ground surface in areas underlain by late Holocene alluvial deposits or Pleistocene alluvial deposits. However, upon implementation of **MM-GEO-1**, impacts would be reduced to below a level of significance. Impacts of the proposed Project are thus considered **less than significant with mitigation incorporated** during construction. No operational impacts would occur, since excavation activities with the potential to uncover paleontological resources would not occur during Project operation.

MM-GEO-1 Paleontological Monitoring

Prior to commencement of any ground disturbing activity on-site, the applicant shall retain a qualified paleontologist pursuant to the Society of Vertebrate Paleontology (SVP 2010) guidelines. The qualified paleontologist or a qualified paleontological monitor shall attend the preconstruction meeting and be on-site during rough grading, trenching, large diameter drilling (greater than 2 feet in diameter), and other significant ground-disturbing activities below a depth of five feet below the ground surface in previously undisturbed Holocene or older alluvial deposits. The qualified paleontologist shall determine the amount of monitoring necessary based on observed subsurface geology and project grading plans. Pursuant to the SVP (2010) guidelines, if abundant plant debris, invertebrate shells, small bones or teeth, or fine-grained sediments conducive to fossil preservation are observed, sediment samples shall be collected and screened to determine the presence of microvertebrate remains.

In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will

remove the rope and allow grading to recommence in the area of the find. Paleontological specimens recovered from the Project site, if any, will be processed in the laboratory. Processing will include removal of any matrix so that the fossil(s) can be identified to the lowest possible taxonomic level. The specimen(s) will then be identified and cataloged into a paleontological database and accessioned into an accredited fossil repository such as the Natural History Museum of Los Angeles County. Any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of the Project proponent.

Following the paleontological monitoring program, a final monitoring report shall be submitted to the Project proponent and City of Covina for review and approval. The report shall summarize the monitoring program and include geological observations and any paleontological resources recovered during paleontological monitoring for the proposed Project.

References

CGS (California Geological Survey). 2002. California Geomorphic Provinces: Note 36. 4 pp.

CGS. 2022. Earthquake Zones of Required Investigation. Accessed March 7, 2023. https://maps.conservation.ca.gov/cgs/EQZApp/.

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

Cohen, K.M., S.C. Finney, P.L. Gibbard, and J.-X. Fan. 2022. "The ICS International Chronostratigraphic Chart." Episodes 36: 199––204. 2013; updated. Available at: https://stratigraphy.org/ICSchart/ChronostratChart2022-02.pdf.

Dibblee, T.W. and J.A. Minch. 2002a. Geologic map of the San Dimas and Ontario quadrangles, Los Angeles and San Bernardino Counties, California: Dibblee Geological Foundation, Dibblee Foundation Map DF-91. scale 1:24,000.

Harden, Deborah R. 2004. California Geology. 2nd Edition. Pearson Education, Inc. New Jersey 552p.

Jahns, R.H., 1954 Geology of the Peninsular Range Province, Southern California and Baja California; California Division Mines Bull. 170: 24 pp.

McLeod, S.A. 2018. Vertebrate Paleontology Records Check for paleontological resources for the proposed Oakmont Senior Living / Memory Care Facility Project, Dudek Project #8817.0009, in the City of Covina, Los Angeles County, project area. Unpublished Records Search Results Letter from the Natural History Museum of Los Angeles County.

NRCS (Natural Resources Conservation Service). 2023. Web Soil Survey. Accessed March 7, 2023. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

SVP (Society of Vertebrate Paleontology). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Available: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

Less Than Significant Impact. Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The three GHGs evaluated herein are CO_2, CH_4, and N_2O because these gases would be emitted during project construction and operation.

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e). Consistent with CalEEMod Version 2022.1.1.7, this GHG emissions analysis assumed the GWP for CH_4 is 25 (i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3, the project is located within SCAQMD jurisdictional boundaries. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2008). The 10,000 MT CO_2e per-year threshold, which was derived from GHG reduction targets established in Executive Order S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land-use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Because the Project consists of a construction and operation of a digital billboard, this analysis applies the recommended SCAQMD threshold of 1,400 MT CO_2e per year, applicable to commercial projects (see "Tier 3"). Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). This impact analysis, therefore, adds amortized construction emissions to the estimated annual operational emissions and then compares operational emissions to the threshold.

Construction Greenhouse Gas Emissions

Construction of the Project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008) recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO_2e per year. The determination of significance, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3. Construction of the Project was modeled as commencing and concluding in October 2023, lasting approximately 2 weeks.[10] On-site sources of GHG emissions include off-road equipment and off-site sources include haul trucks, vendor trucks, and worker vehicles. Table 3.8-1 presents construction GHG emissions for the Project from on-site and off-site emission sources.

Table 3.8-1. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2023	16.6	<0.01	<0.01	16.7
			Amortized Emissions (over 30 years)	0.56

Source: Appendix A
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 3.8-1, the estimated total GHG emissions during construction of the Project would be approximately 17 MT CO_2e. Estimated Project-generated construction emissions amortized over 30 years would be less than one MT CO_2e per year. As with Project-generated construction air quality pollutant emissions, GHG emissions generated during construction of the Project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

[10] October 2023 has passed, and in practice, construction is anticipated to begin in late 2024 or early 2025. However, using an earlier start date for construction represents a worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. As such, while October 2023 has passed, it has been retained as the construction date for the purposes of this analysis to yield conservative results.

Operational Greenhouse Gas Emissions

CalEEMod Version 2022.1.1.7 was used to estimate potential Project-generated operational GHG emissions from area, energy, and mobile sources. As with the air quality analysis, mobile source GHG emissions were estimated using CalEEMod based on EMFAC2021 emission factors. Emissions from each category (area sources, energy sources, mobile sources, solid waste, water supply, and wastewater treatment) are discussed in the following text with respect to the Project. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy, and mobile sources. Operational year 2024 was assumed to be the first potential year of operation.

Area Sources

Area source emissions from landscaping maintenance (e.g., from lawn mowers, blowers, and other equipment) were assumed to be consistent with existing conditions at the site and are therefore not captured in the emissions inventory. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in the air quality analysis only, since they are associated with low to no GHG emissions.

Energy Sources

The estimation of operational energy emissions was based on annual energy demand information provided by the Project applicant. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 BTUs) for CO_2 and other GHGs.

The CalEEMod default energy intensity factor (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for Southern California Edison were used for this analysis. SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by December 31, 2020, and SB 100 calls for further development of renewable energy, with a target of 44% by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030. As such, GHG emissions associated with Project electricity demand would continue to decrease over time.

Mobile Sources

All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) would gradually reduce emissions from the Project's motor vehicles. The effectiveness of fuel economy improvements was evaluated to the extent it was captured in the EMFAC2021 emission factors for motor vehicles in 2023.

Water, Solid Waste, and Wastewater

The Project would not generate solid waste or wastewater or require significant quantities of water during operation. Therefore, no GHG emissions are associated with these source categories.

The estimated operational (year 2024) GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and off-road equipment are shown in Table 3.8-2.

Table 3.8-2. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Proposed Project				
Area	0.00	0.00	0.00	0.00
Energy	15.6	<0.001	<0.01	15.7
Mobile	0.97	<0.01	<0.01	0.99
Solid waste	0.00	0.00	0.00	0.00
Water supply and wastewater	0.00	0.00	0.00	0.00
			Project Total	**16.70**
			Amortized Construction Emissions	*0.56*
			Proposed Project + Amortized Construction Emissions Total	**17.26**

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 3.8-2, estimated annual generated GHG emissions would be approximately 17 MT CO_2e per year as a result of Project operation. Annual operational GHG emissions with amortized construction emissions would not exceed the threshold of 1,400 MT CO_2e per year and impacts would be **less than significant**.

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

Less Than Significant Impact. The Project would result in less-than-significant impacts related to conflicts with GHG emission reduction plans, for the reasons described as follows.

Potential to Conflict with the City's Energy Action Plan

The City adopted an EAP in 2012; however, the EAP's scope was limited to energy and gas consumption and did not address strategies to reduce GHG emissions from other sources, such as transportation or solid waste (City of Covina 2012). The Project would be consistent with the intent of the EAP due to the Project's energy efficient digital display design. The City has not adopted a comprehensive climate action plan and there is currently no local guidance that would be applicable to the Project. However, there are regional and statewide plans and goals that have been set forth to reduce GHG emissions at the regional and statewide scale, such as the CARB Scoping Plan and SCAG's 2020 RTP/SCS. The Project's consistency with these plans and GHG reduction goals is described below.

Potential to Conflict with the Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG 2020–2045 RTP/SCS (Connect SoCal) is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the Southern California Region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2020-2045 RTP/SCS outlines a series of actions and strategies for

integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use.

The following strategies are intended to be supportive of implementing the 2020-2045 RTP/SCS and reducing GHGs: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region (SCAG 2020). The strategies that pertain to SCAG's focusing growth near transit, promoting diverse housing, and support of local jurisdiction sustainability efforts would not apply to the Project because the Project is the operation of a digital billboard display and would not include a source of either new housing or jobs within the SCAG's jurisdiction. The Project's potential to conflict with the remaining applicable strategies is presented in the following text.

Leverage Technology Innovations. One of the technology innovations identified in the 2020–2045 RTP/SCS is the promotion of the use of high efficiency lighting in development projects. The Project would not conflict with SCAG's ability to implement this strategy because it would include the use of energy-efficient LED digital displays. Use of LEDs reduces electricity demand by at least a factor of five compared to incandescent bulbs. Additionally, the displays would not require heating, ventilation, and air conditioning (HVAC) equipment, which was sometimes required for older digital billboard technologies. This would further reduce the energy demand and thus GHG emissions of the Project.

Promote a Green Region. Another applicable strategy within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves promoting a green region through efforts such as supporting local policies for renewable energy production and promoting more resource efficient development (e.g., reducing energy consumption) to reduce GHG emissions. As discussed above, the Project would use an energy efficient LED digital display and would not require an HVAC system.

Based on the analysis above, the Project would not conflict with the SCAG 2020–2045 RTP/SCS.

Potential to Conflict with the CARB Scoping Plan

California State Legislature passed AB 32 to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and to initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. While the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations, it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the applicable Scoping Plan policies and would not impede attainment of the goals therein.

For the Project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions to be reduced to 40% below 1990 levels by 2030 and 85% below 1990 levels by 2045. In addition, AB 1279 requires that the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter. CARB's 2017 Climate Change Scoping Plan Update was the first to address the state's strategy for achieving the 2030 GHG

reduction target set forth in SB 32 (CARB 2017), and the most recent 2022 Scoping Plan for Achieving Carbon Neutrality outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses the progress that the state is making toward the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 establish the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates that outline the strategy to achieve those targets are the most applicable to the Project.

The 2017 Scoping Plan included measures to promote renewable energy and energy efficiency (including the mandates of SB 350). The 2017 Scoping Plan also increased the stringency of several existing programs including the Low Carbon Fuel Standard (LCFS), Mobile Source and Freight Strategies, and SB 375 targets. The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022). The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 Scoping Plan to include those that capture and store carbon in addition to those that reduce only anthropogenic sources of GHG emissions.

Many of the measures and programs included in the Scoping Plan would result in the reduction of Project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (LCFS), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Given that the Project would generate minimal operational vehicle trips and associated mobile source GHG emissions, the Project would also not conflict with the Scoping Plan's goal of reducing GHG emissions through reductions in vehicle miles traveled statewide.

Of note, the 2022 Scoping Plan emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the Project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Overall, the Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. The Project would not conflict with CARB's 2017 or 2022 Scoping Plan updates or with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals and would support GHG reduction efforts by using high efficiency LED lighting and using updated display designs that would not require energy intensive HVAC systems. For these reasons, impacts would be **less than significant.**

References

CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008.

CARB (California Air Resources Board). 2017. California's 2017 Climate Change Scoping Plan. November 2017. Accessed December 2019. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

CARB. 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. November 16th, 2022. Accessed April 2023. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf.

City of Covina. 2012. *City of Covina Energy Action Plan*. December 2012. Accessed April 2023. https://covinaca.gov/sites/default/files/fileattachments/public_works/page/584/covina-eap-december-2012_final.pdf.

IPCC (Intergovernmental Panel on Climate Change). 2007. Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. New York, New York: Cambridge University Press. Accessed October 2016. https://www.ipcc.ch/report/ar4/syr/.

SCAG (Southern California Association of Governments). 2020. The 2020-2045 Reginal Transportation Plan/Sustainable Communities Strategy. September 3, 2020. Accessed April 2023. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

SCAQMD (South Coast Air Quality Management District). 2008. A Resolution of the Governing Board of the South Coast Air Quality Management District (AQMD) approving the Interim Greenhouse Gas (GHG) Significance Threshold to Be Used by the AQMD for Industrial Source Projects, Rules and Plans When It Is the Lead Agency for Projects Subject to the California Environmental Quality Act (CEQA)." Resolution No. 08-35. Adopted December 5, 2008.

SCAQMD. 2010. "Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15." September 28, 2010. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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

Less Than Significant Impact. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings, would be used during construction the Project. These materials are not considered acutely hazardous and are used routinely throughout urban environments for both construction projects and small-scale structural improvements. Additionally, these materials would be transported and handled in compliance with all applicable federal, state, and local laws regulating the management and use of hazardous materials. Therefore, the use of these materials for their intended purposes would not pose a significant risk to the public or environment. Once the construction of the Project is completed, fuels and other petroleum products associated with the Project would no longer remain on the site.

The operation of the Project would not generally require additional materials, whether hazardous or non-hazardous, beyond those that are currently used on the Project site for operation and maintenance of the existing office building, surface parking lot, and landscaping. The proposed billboard would involve several types of additional materials, including LED bulbs for the billboard. LED modules require periodic replacement. During these periodic maintenance events, the used modules would be recycled at a nearby facility, if possible; LEDs

are not regulated wastes, and therefore could also be disposed of as solid waste. As LEDs are not considered a hazardous material, and would be recycled, if possible, disposal would not pose a significant risk to the public or environment. As such, with the compliance of applicable regulations governing the transport, use, and disposal of hazardous materials, Project impacts would be **less than significant.**

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

Less Than Significant Impact with Mitigation Incorporated. As discussed under Section 3.9(a), construction of the Project would involve relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered acutely hazardous and are used routinely throughout urban environments for both construction projects and small-scale structural improvements. Additionally, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Therefore, construction of the Project is not anticipated to release hazardous materials into the environment that would pose a threat to the public or the environment.

As further discussed in Section 3.9(d), the Project site is not mapped on government databases as a hazardous materials site, nor are there any hazardous materials sites within the immediate vicinity of the Project site. However, the Project site is located adjacent to the I-10 freeway, and soils on the Project site would thus have the potential to be contaminated with lead, due to historical use of leaded gasoline. Specifically, the historical use of leaded gasoline has caused aerially deposited lead (ADL) to be distributed along older roadways, resulting in elevated lead concentrations in soils. Some of these lead concentrations have been found to exceed hazardous waste levels, especially on roads that have had high vehicle emissions from large traffic volumes or congestion, generally prior to 1986 when leaded gasolines were used. The I-10 freeway has been a major roadway, in some form, since the 1930s, and was expanded to an interstate freeway in the 1960s. As such, due to the Project site's proximity to the I-10 freeway, there is the potential for ADL in surface soils. During construction, limited amounts of ground disturbance would be required for pole foundation and structure installation at the southwestern corner of the Project site. Due to the nature of the aerial deposition, ADL is typically limited to surface soils. The California Department of Toxic Substances Control (DTSC) entered into an enforceable agreement with Caltrans in 2016 pertaining to ADL (DTSC 2016). This agreement established the definition of "clean soil" as soil which contains total lead less than 80 milligrams per kilogram (mg/kg) or soluble lead less than 5 milligrams per liter (mg/L) as determined by the California Waste Extraction Test (CA-WET) (also known as the Soluble Threshold Limit Concentration, or STLC) (DTSC 2016). Per the agreement between DTSC and Caltrans, if soils with lead concentrations exceeding either 80 mg/kg total lead or 5 mg/L soluble lead are identified, such soils must be removed and disposed of in accordance with federal, state, and local regulations. The proposed Project is not a Caltrans-lead project; rather, it is a private development proposed on land within the City of Covina jurisdiction. Nevertheless, as the proposed area of ground disturbance associated with the Project would be used solely for billboard advertising, the clean soil criteria established by Caltrans and DTSC can be utilized to evaluate the presence of lead at the Project site.[11] Additionally, soils with a lead concentration greater than 5 mg/L based on the CA-WET are considered hazardous waste as defined in 22 CCR Section

[11] For informational purposes, it is noted that 80 mg/kg also meets the Environmental Screening Level (ESL) for residential soils established by San Francisco Regional Water Quality Control Board (SFRWQCB) in 2019. However, the Project site would not be developed for residential purposes as part of the Project and is zoned for commercial use.

66261.24 and, as such, are required to be managed as hazardous waste in accordance with federal, state, and local regulations.

If lead-impacted soils with lead concentrations above the aforementioned thresholds are present at the Project site and are disturbed during construction without proper safety procedures, such soils could be inadvertently released to the environment as airborne dust and/or runoff, causing potentially adverse impacts to the public and/or the environment based on exposure to lead, which is a hazardous substance in soluble quantities above 5 mg/L. Additionally, if proper procedures for handling such soils are not implemented during construction, construction workers could be exposed to lead, which can result in adverse health effects. Due to the potential presence of lead-impacted soils on the Project site and the impacts that could result from the release of lead into the environment and/or worker exposure, **MM-HAZ-1** has been set forth to ensure that any lead-impacted soils are identified and handled properly.

MM-HAZ-1 Surface Soil Evaluation

Prior to Project construction, the Project applicant shall retain a qualified hazardous materials professional to collect at least three surface soils samples from the proposed area of ground disturbance. (The qualified hazardous materials professional shall be trained in Hazardous Waste Operations and Emergency Response (HAZWOPER) and shall have one or more of the following qualifications: Professional Geologist (PG), Professional Engineer (PE), and/or a bachelor's or advanced degree in environmental, geological, or soil sciences with knowledge of soil contamination issues.) The samples shall be analyzed for total lead using U.S. Environmental Protection Agency Test Method 6010B and soluble lead using the California Waste Extraction Test or the Soluble Threshold Limit Concentration. Should concentrations of lead exceed either a total lead concentration of 80 milligrams per kilogram (mg/kg) or a soluble lead concentration of 5 milligrams per liter (mg/L), either by determining the 95% upper confidence level or the maximum detected concentration, appropriate handling procedures shall be implemented during Project construction, as follows:

- If soils are found to have lead concentrations exceeding 5 mg/L, on-site soils shall be characterized as hazardous waste and shall be handled in accordance with 22 CCR Division 4.5, Environmental Health Standards for the Handling of Hazardous Wastes. This would include, but is not limited to, creating a U.S. Environmental Protection Agency Identification number for hazardous waste generation, manifesting hazardously classified materials, transporting hazardously classified materials using a licensed hazardous waste transporter under manifest procedures, and disposing of wastes at a licensed hazardous waste facility.
- If soils are found to have total lead concentrations above 80 mg/kg but soluble lead concentrations of less than 5 mg/L, on-site soils shall be removed and disposed of at a licensed solid waste landfill that allows for the disposal of non-hazardous lead-impacted soils. Such soils shall be handled and transported in accordance with applicable transportation, handling, and disposal regulations on a federal, state, and local level.

Should concentrations of lead be less than the aforementioned thresholds, soils are not considered hazardous and can be reused on site or disposed of at a landfill that accepts soils.

Upon implementation of **MM-HAZ-1**, on-site soils would be properly characterized and handled to avoid releases of lead into the environment and/or exposure of construction workers to lead. Implementation of **MM-HAZ-1** would also ensure that construction would be in compliance with SCAQMD Rule 1466: Control of Particulate Emissions from Soils with Toxic Air Contaminants. Construction of the Project would also comply with SCAQMD District rules, including Rule 403: Fugitive Dust, as stated in Section 3.3, above.

Upon Project implementation, the Project site uses would not substantially change. As discussed in Section 3.9(a), new operational materials associated with the Project, including LED bulbs, would be handled and disposed of in accordance with all federal, state, and local requirements. Therefore, upon compliance with applicable regulations, Project operation is not anticipated to result in the release of hazardous materials such that a significant hazard to the public or to the environment would occur. Operational impacts would thus be less than significant, and construction impacts would be **less than significant with mitigation incorporated.**

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

No Impact. There are no existing or proposed schools located within one-quarter mile of the Project site. As such, there would be **no impact.**

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Project site is not included on any hazardous waste site lists including the California Department of Toxic Substance Control (DTSC) EnviroStor Database, the State Water Resources Control Board (SWRCB) GeoTracker site, the Cortese List, the Superfund Site list, or other lists compiled pursuant to Section 65962.5 of the Government Code (DTSC 2023; SWRCB 2023a, 2023b; CalEPA 2023a, 2023b). Therefore, there would be **no impact.**

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

No Impact. The nearest airport to the Project site is Brackett Field Airport, which is located approximately 4.5 miles to the east-northeast. The City, including the Project site, is not located in this airport's influence area, according to the Brackett Field Airport Land Use Compatibility Plan (County of Los Angeles 2015). Therefore, the Project would not be located within an airport land use plan, nor would it be located within two miles of a public airport or public use airport. **No impact** would occur.

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

No Impact. The City has prepared the "multi-hazard Covina Emergency Plan" for emergency response within the City. The multi-hazard Covina Emergency Plan addresses the City's planned response to

emergencies associated with natural disasters and hazardous materials incidents (City of Covina 2000). According to the City's General Plan Safety Element, all major public streets serve as the principal evacuation routes. These principal routes are well maintained to support an evacuation function to the extent feasible (City of Covina 2000). The proposed Project would result in the development of a billboard structure on a developed site. The Project would not result in significant impacts to circulation within the City during construction or operation, such that emergency response or evacuation could be impaired. Specifically, construction staging would occur within the existing paved parking lot at the Project site and is not expected to require roadway or lane closures. While the Project site's western driveway may be temporarily closed during the Project's relatively brief construction period, the eastern driveway would remain open and fully accessible throughout construction and would allow for emergency access and/or evacuations, in the event of an emergency. As such, Project construction is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. During operations, the proposed Project would not be associated with substantial increases in traffic volumes such that nearby roadways would be adversely affected relative to existing conditions and the Project site, including the driveways and parking lot, would remain relatively unchanged compared to existing conditions. The Project would not include development of habitable structures such that additional people would need to evacuate the site in the event of an emergency. The Project would be required to comply with the multi-hazard Covina Emergency Plan, and any evacuations would proceed in a similar manner with or without the Project. In addition, as discussed in Section 3.15, Public Services, the Project would not result in an increase in the demand for fire protection or emergency services. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and there would be **no impact.**

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. A designated very high fire hazard severity zone (VHFHSZ) generally surrounds the Project site to the east, south, and west, with a small portion of the VHFHSZ overlapping with the southwestern corner of the Project site (CALFIRE 2023). However, the Project site is developed and is surrounded on all sides by other urban development, including commercial buildings, a City park, and the I-10 freeway. The nearest wildland area to the site is within the Covina Hills, approximately 0.60 miles southeast of the site (City of Covina 2000). This area is separated from the Project site by existing commercial and residential development, as well as the I-10 freeway, which would likely preclude a wildland fire originating in the Covina Hills from reaching the Project site. Furthermore, the proposed Project would not change existing conditions such that additional people or structures would be exposed to significant risk of loss, injury, or death caused by a wildland fire. The proposed Project does not involve new buildings or new building occupants, which could increase the number of people exposed to wildland fire hazards in the area. While the Project would involve construction activities in the vicinity of a VHFHSZ, due to the short duration of construction (2 weeks) combined with required adherence to standard construction safety practices and fire code requirements, hazardous ignitions due to construction activities is not anticipated. While the Project would involve the operation of LED bulbs on the Project site, when used for their intended purposes and when operated and installed in accordance with standard procedures, LED bulbs do not pose an increased risk of fire relative to other lighting sources. As such, the proposed Project is not expected to increase the potential for fires to occur in the Project area. In the unlikely event of a wildland fire emergency in the project area, the Los Angeles County Fire Department would provide fire protection services.

Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and there would be **no impact.**

References

CalEPA (California Environmental Protection Agency). 2023a. Cortese List: Section 65962.5(a). Accessed March 8, 2023. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/.

CalEPA. 2023b. List of Solid Waste Disposal Sites. Accessed March 8, 2023. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf.

CALFIRE (California Department of Forestry and Fire Protection). 2023. FHSZ Viewer. Accessed March 8, 2023. https://egis.fire.ca.gov/FHSZ/.

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

County of Los Angeles. 2015. Brackett Field Airport Land Use Compatibility Plan. December 9, 2015. https://planning.lacounty.gov/long-range-planning/brackett-field-airport-land-use-compatibility-plan/.

DTSC (Department of Toxic Substance Control). 2016. Docket No. ESPO-SMA 15/16-001 Soil Management Agreement for Aerially Deposited Lead-Contaminated Soils. June 29, 2016. https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/DTSC-Caltrans-ADL-Agreement-Signed-w-Exhibits-Final-6.30.16.pdf?emrc=520240.

DTSC. 2023. List of Hazardous Waste and Substances Sites. Accessed March 8, 2023. https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29.

SWRCB (State Water Resources Control Board). 2023a. List of "Active" CDO and CAO. Accessed March 8, 2023. https://calepa.ca.gov/sitecleanup/corteselist/.

SWRCB. 2023b. List of Leaking Underground Storage Tank Sites. Accessed March 8, 2023. https://geotracker.waterboards.ca.gov/.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

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

Less Than Significant Impact. Short-term construction activities associated with the Project would have some potential to affect the quality of stormwater discharged from the Project site. Land disturbance activities could result in erosion and sedimentation, and spills and leaks of petroleum products used by construction equipment could also affect the quality of stormwater. The City's Municipal Code, however, prohibits discharges to the storm drain system of any pollutant, which includes fuel, chemical waste, or other materials that have potential adverse effects on water quality (Section 8.50.030 of the City's Municipal Code). Additionally, the City's Municipal Code requires the implementation of BMPs that serve to minimize the potential for leaks, spills, or discharges of pollutants to occur (Section 8.50.060 of the City's Municipal Code). Standard site management practices and typical equipment maintenance, in combination with the implementation of municipal code requirements involving stormwater quality, would generally preclude leaks and spills of a magnitude that would adversely impact stormwater runoff. Construction-

related water quality impacts can also occur if land disturbance activities result in erosion or sedimentation downstream. As previously discussed, the Project would require relatively limited ground disturbance for its construction. Additionally, the Project would not result in large areas of exposed soils that could be transported offsite during storm events. During operation, the proposed Project would not require water, aside from occasional watering needs of any potential replacement landscaping that may be installed. However, because such landscaping would be installed to replace any existing landscaping that is removed, the total irrigation requirements of the Project site are not anticipated to substantially change. If new irrigation is installed, it would be installed such that water is directed towards each plant and away from adjacent sidewalks and roadways. Therefore, due to the limited construction activities and ground disturbance that would be required for the Project, as well as required compliance with the regulations outlined in the City's Municipal Code, including stormwater management BMPs, the Project's impacts in regard to water quality standards and waste discharge requirements would be **less than significant**.

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

Less Than Significant Impact. The placement of the pole and pole foundation associated with the Project would result in the conversion of existing permeable landscaping area to impermeable surface area. However, the impermeable surface area of the pole foundation would be limited in size and relatively negligible compared to the existing planter areas that surround the Project site. Specifically, the pole foundation is expected to occupy a surface area of approximately 28 square feet. As such, a majority of the existing planter areas would remain. Therefore, the Project's impacts regarding the conversion of permeable land to impermeable land would be isolated to the area in which the pole would be placed in, which is a relatively small portion of the Project site. Additionally, the Project would not involve direct use of groundwater, nor would it substantially increase water use on the Project site relative to existing conditions. While excavation for the billboard pole foundation and structure may have the potential to encounter groundwater, this would not result in adverse effects to groundwater supply or sustainable groundwater management. Because the Project would result in only minor changes to the Project site's impermeable surface cover, and because the Project would not require additional extraction of groundwater supplies or a substantial increase in water use, the Project's impacts on groundwater supply and groundwater recharge would be **less than significant.**

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

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

Less Than Significant Impact. The Project site does not contain any streams or rivers. The proposed Project would result in limited ground disturbance on a site that contains an office building, surface parking lot, and landscaped areas. In addition, as discussed in Section 3.10(a), all construction activities would be required to comply with the City's stormwater management regulations established in Chapter 8.50 of the City's Municipal Code. Further, the Project would not result in any ground disturbing activities during operation. Therefore, stormwater flows on the site would largely follow the same course as existing flows upon Project implementation, and impacts regarding erosion of siltation would be **less than significant.**

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

No Impact. As previously discussed, the stormwater flows on the Project site would largely follow the same course as existing flows upon implementation of the Project. In addition, the proposed Project would not result in an increase in the amount of surface runoff that would potentially lead to flooding. This is because the Project would not substantially change the conditions of the Project site, including the amount of impervious surface cover. As such, there would be **no impact** associated with flooding.

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

Less Than Significant Impact. During operation, the proposed Project would not require water, aside from occasional watering needs of any potential replacement landscaping that may be installed. However, because such landscaping would be installed to replace any existing landscaping that is removed, the total irrigation requirements of the Project site are not anticipated to substantially change. If new irrigation is installed, it would be installed such that water is directed towards each plant and away from adjacent sidewalks and roadways. Installation of the proposed billboard pole would result in an increase in the impermeable surface area at the Project site, however, this change would be relatively minor and would only contribute nominally to the amount of impermeable surfaces on the Project site relative to existing conditions. Therefore, Project implementation would not result in a substantial increase in stormwater runoff and would not exceed the capacity of existing or planned stormwater drainage systems.

As discussed in Section 3.9(a), construction of the Project would temporarily increase potential sources of stormwater pollutants on the Project site. These potential pollutants would include construction-related chemicals such as petroleum products used for construction equipment and sediments resulting from temporary ground disturbance. However, the duration of construction and the amount of required equipment and materials for the Project would be limited. Additionally, compliance with the regulations established in Chapter 8.50 of the City's Municipal Code would minimize the potential for stormwater contamination to occur during construction of the Project. As such, because the drainage patterns of the Project site would remain relatively unchanged and the Project would be required to comply with applicable stormwater regulations, impacts regarding stormwater runoff would be **less than significant.**

iv) Impede or redirect flood flows?

Less Than Significant Impact. The Project site is mapped within the Federal Emergency Management Agency (FEMA) Flood Zone X, which includes areas determined to be outside the 0.2% annual chance of serious flooding (FEMA 2023). As such, the Project site is not located in a flood hazard zone. As previously discussed, implementation of the Project would slightly increase the amount of impervious surfaces on the Project site. This change would be minor, however, and would not result in substantial changes in water flow on the Project site. As such, impacts associated with impeding or redirecting flood flows would be **less than significant.**

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As previously stated, the Project site is not located in a flood hazard zone. The nearest body of water to the Project site is the Puddingstone Reservoir and Dam complex, located

approximately 3 miles to the northeast of the Project site. In the event of dam failure, some areas of the City could be subject to flooding-related hazards. As specified in the General Plan Safety Element, in the event of dam failure, flooding could reach the City in as little as 20 minutes, and rushing water could overflow the banks of Walnut Creek by approximately one-quarter mile on each side (City of Covina 2000). The Project site is located approximately 0.4 miles south of Walnut Creek and is thus situated outside of the potential area of flooding that is described in the General Plan. Additionally, there are a number of flood control infrastructure components in the City, such as two large flood control spreading grounds located at the easterly terminus of Workman Avenue (approximately 0.55 miles northwest of the Project site) and at the southwest corner of Arrow Highway and Barranca Avenue (approximately 2.5 miles northwest of the Project site) (City of Covina 2000). Furthermore, Puddingstone Dam is subject to a variety of inspections and regulations that preclude dam failure to the extent practicable. In the unlikely event of dam failure at the Puddingstone Reservoir and Dam complex, the Project site is not anticipated to be susceptible to hazardous flooding conditions. There are other reservoir-serving dams north and northeast of the City in the San Gabriel Mountains that could also break. However, as stated in the General Plan Safety Element, potentially negative impacts on the City would be minimized because these facilities are all several miles from the City, which would enable most, if not all, of the water to be caught by storm drains in adjacent communities and also would allow officials adequate time for emergency activities. Additionally, the community's flood control system in the upper and central portions of the City is expected to be able to handle incoming residual waters, in the unlikely event of dam breakage to the north of the City (City of Covina 2000). Impacts related to flooding would, therefore, be less than significant.

Seiches are earthquake-induced waves in enclosed bodies of water, such as lakes or reservoirs. Puddingstone Reservoir, the closest reservoir to the Project site, is located approximately 3 miles northeast of the site. The City has identified seiches as a potential hazard to the community due to the presence of the Puddingstone Reservoir and Dam complex (City of Covina 2000). In the General Plan Safety Element, the City identifies several courses of action to deal with the impacts of seiches including administering reasonable development standards for properties abutting Walnut Creek, which extends west of Puddingstone Dam and could be affected in the event of a seiche, and continuing emergency preparedness activities (City of Covina 2000). The Project site does not abut Walnut Creek and would not conflict with the City's emergency preparedness activities. While a catastrophic earthquake event and associated seiche could pose a hazard to portions of the City, inundation of the Project site is not anticipated due to intervening distance between Puddingstone Reservoir and the Project site and the flood control infrastructure in the urbanized areas around the Project site. Impacts related to seiches would, therefore, be less than significant.

A tsunami is a sea wave generated by an underwater seismic disturbance, such as a sudden faulting or landslide activity. Because the City is not located in a coastal area (the City is located approximately 27 miles inland from the Pacific Ocean), the risk of tsunami affecting the Project area is low. Therefore, for the reasons described above, Project impacts associated with flooding, seiche, and tsunamis would be **less than significant.**

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

No Impact. The Los Angeles Regional Water Quality Control Board (RWQCB) has adopted the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) for its region of responsibility, which includes the City of Covina (Los Angeles RWQCB 2014). The Basin Plan contains water quality

regulations and implementation programs for the region. As previously discussed, the Project is not anticipated to cause substantial runoff or increase of pollutants that would impact water quality or groundwater management. Additionally, the Project would be required to comply with the City's regulations regarding stormwater management practices during construction. As such, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and there would be **no impact.**

References

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

FEMA (Federal Emergency Management Agency). 2023. National Flood Hazard Layer. Accessed March 9, 2023. https://www.fema.gov/flood-maps/national-flood-hazard-layer.

Los Angeles RWQCB (Regional Water Quality Control Board). 2014. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. September 11, 2014. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The Project is located on a parcel that contains an existing commercial office building and associated improvements. Upon Project implementation, the site would contain a single billboard pole, which would not have the potential to create a division within an established community. Implementation of the Project would not result in any other on- or off-site development that may have the potential to divide an established community, such as a highway, aboveground infrastructure, or an easement through an established neighborhood. As such, there would be **no impact.**

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

Less Than Significant Impact. Land use plans and policies applicable to the Project site are set forth in the City's General Plan, the City's zoning ordinance, and the Village Oaks Office Park PCD Overlay District. Project development requires changes to the zoning ordinance and to the PCD Overlay District, in order to allow for a billboard to be installed on the Project site. These changes would bring the proposed Project into consistency with the land use and zoning designations for the Project site. As demonstrated throughout this IS/MND, the proposed Project would not result in significant, unavoidable effects on the environment. Upon approval of the proposed amendments to the zoning ordinance and to the Village Oaks Office Park PCD Overlay District, the proposed Project would not conflict with any existing land use policies. As such, impacts would be **less than significant.**

References

None.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

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

No Impact. According to the California Geologic Energy Management Division (CalGEM), there are no oil, gas, geothermal, or other known wells located on the Project site. CalGEM maps indicate that the City has two dry holes; however, both are located in residential areas and have been abandoned and plugged. (Dry holes are wellbores that have not encountered resources in economically producible quantities) (CalGEM 2023). As such, the development of the proposed Project would not have the potential to interfere with extraction of oil, gas, or geothermal resources.

The City is located within the San Gabriel Production-Consumption Region for Portland Cement Concrete–grade aggregate resources, as mapped by the Division of Mines and Geology (renamed the California Geological Survey in 2006) (Division of Mines and Geology 1982a). The Division of Mines and Geology has

mapped the Project site within Mineral Resource Zone 3 for aggregate resources (Division of Mines and Geology 1982b). Mineral Resource Zone 3 is a designation given to "areas containing mineral deposits the significance of which cannot be evaluated from available data." The majority of the City has been mapped within Mineral Resource Zone 3. Portions of the City, particularly to the north, are within Mineral Resource Zone 2, which is a designation given to "areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists" (Division of Mines and Geology 1982b). The City's General Plan indicates that the state identified the presence of two subsurface areas in the northern part of the City that may contain mineral deposits. However, the City's General Plan states that the state has also declared these areas to be insignificant due to urbanization and potentially negative incursions that would preclude extraction (City of Covina 2000). Additionally, the City's General Plan states that there are no mining activities, aggregate production activities, or drilling/producing of minerals in the City and that such activities are prohibited from occurring within the City. Due to the urbanized nature of the City, as well as the Project area, mineral resource extraction would be an incompatible land use. Furthermore, the Project is proposed within an urbanized, built-out area and would not involve land use changes that would affect the availability of mineral resources in the City. For these reasons, **no impact** to the availability of state or regionally important mineral resources would occur.

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

No Impact. According to the City's General Plan Natural Resources and Open Spaces Element, there are no significant mineral resources present in the City (City of Covina 2000). Additionally, the City's General Plan states that there are no mining activities, aggregate production activities, or drilling/producing of minerals occurring in the City. Furthermore, the City's zoning ordinance prohibits the extraction or production of aggregates. As such, the City has not identified any locally important mineral resource recovery sites. Therefore, the Project would not result in the loss of availability of a locally important mineral resource, and **no impact** would occur.

References

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

CalGEM (California Geology Energy Management Division). 2023. CalGEM GIS: Well Finder. Accessed March 2023. https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx.

Division of Mines and Geology. 1982a. Mineral Land Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

Division of Mines and Geology. 1982b. Mineral Land Classification Map Aggregate Resource Only, Claremont-Upland P-C Region.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise and Vibration Characteristics

Noise

Noise is defined as unwanted sound. Sound may be described in terms of level or amplitude (measured in decibels [dB]), frequency or pitch (measured in hertz or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) scale performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level, the day–night average noise level (L_{dn}), and the Community Noise Equivalent Level (CNEL). Each of these descriptors uses units of dBA. Table 3.13-1 provides examples of A-weighted noise levels from common sounds. In general, human sound perception is such that a change in sound level of 3 dB is barely noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving the sound level.

Table 3.13-1. Typical Sound Levels in the Environment

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 mph)	80	Food blender at 1 meter (3 feet) Garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime gas lawn mower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area Heavy traffic at 90 meters (300 feet)	60	Normal speech at 1 meter (3 feet)
Quiet urban daytime	50	Large business office Dishwasher, next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural night time	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013
Note: dBA = A-weighted decibel.

L_{eq} is a sound energy level averaged over a specified period (typically no less than 15 minutes for environmental studies). L_{eq} is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. L_{eq} is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors.

Unlike the L_{eq} metrics, L_{dn} and CNEL metrics always represent 24-hour periods, usually on an annualized basis. L_{dn} and CNEL also differ from L_{eq} because they apply a time-weighted factor designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). "Time weighted" refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB and, as such, are often treated as equivalent to one another.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can cause buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual

for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Several different methods are used to quantify vibration. Peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square amplitude is most frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation is commonly used to measure root mean square. The decibel notation acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise and vibration sensitive.

The nearest sensitive receptors for the purposes of the noise analysis for this Project are considered to be the hotel to the northwest of the Project site, the nearest façade of which is approximately 150 feet from the Project work area. The next-nearest sensitive land use is Jalapa Park, located approximately 350 feet northeast of the Project work area. Other noise-sensitive receivers, such as the residences located to the northwest (approximately 450 feet away) would be less affected by Project-related noise by virtue of distance.[12]

Existing Noise Conditions

The City of Covina is located in an urbanized and developed environment which is subject to numerous noise sources. The primary noise source in the City is vehicular traffic along major freeways and arterials including the adjacent San Bernardino Freeway (I-10), Garvey Street, and Holt Avenue. In addition, typical urban noise sources (e.g., businesses, construction activities, landscape equipment, etc.) also contribute to the overall noise environment.

According to the City of Covina General Plan Noise Element, the potentially affected receivers near the proposed Project are within the 65 dB traffic noise level contour generated by vehicles traveling on major arterial roadways including the San Bernardino Freeway and Holt Avenue.

[12] Residences are also located to the south (south of the I-10 freeway) approximately 400 feet or more from the Project site; these residences would not be affected by Project-related noise because in addition to the distance, the freeway would effectively block any such potential noise effects.

Local Noise Regulations

Covina Noise Ordinance

The City's Noise Ordinance (Chapter 9.40 of the City's Municipal Code) serves to protect people from non-transportation noise sources such as construction activities, commercial operations, machinery, and nightlife. The City's Noise Ordinance outlines factors to be considered when determining whether a noise, sound, or vibration is a prohibited noise source within the City (Section 9.40.080); provides examples of prohibited noises (Section 9.40.030); and discusses noise exemptions (Section 9.40.140).

The City's Noise Ordinance includes noise regulations (Section 9.40.110) that regulate noise from construction activities. Specifically, it is unlawful to operate equipment or perform outside construction or repair work within 500 feet of a residential land use between the hours of 8:00 p.m. of any one day and 7:00 a.m. of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance.

The City's exterior noise standards for operational stationary noise source activities is specified by associated land uses in Section 9.40.040, as shown here in Table 3.13-2. For low density residential, the allowable noise standard is 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. and 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. For medium density residential, the allowable noise standard is 60 dBA between the hours of 7:00 a.m. to 10:00 p.m. and 50 dBA between the hours of 10:00 p.m. to 7:00 a.m.

Table 3.13-2. City of Covina Exterior Noise Level Limits (Stationary Noise Sources)

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

Source: City of Covina 1988.

Vibration Standards

Section 9.40.120(J) of the City's Municipal Code limits vibration levels created on a particular property from being felt at or beyond the property boundary line. Section 9.40.020(30) of the City's Municipal Code defines the vibration perception threshold as motion velocity of 0.01 inches per second over the range of one to 100 Hertz.

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

Short-Term On-Site Construction Noise

Less Than Significant Impact with Mitigation Incorporated. Noise generated by Project construction equipment would include a combination of heavy equipment including a drill rig, cranes, front end loaders, backhoes, and a concrete saw that, when combined, can reach relatively high noise levels. The number and mix of construction equipment would vary during the Project's construction phases. The duration of construction would be relatively brief and would consist of two phases; it is estimated that the new billboard construction phase would require approximately 1 week of work and the landscaping phase would also require approximately 1 week of work.

With the noise sources identified above (and using the same specific construction equipment assumptions as used for the air quality analysis (Section 3.3), a noise analysis was performed using a model developed by the Federal Highway Administration called the Roadway Construction Noise Model (RCNM) (FHWA 2008). Input variables for the RCNM consist of the receiver/land use types, the equipment type (i.e., backhoe, crane, truck, etc.), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of hours the equipment typically works per day), and the distance between the construction noise source and the sensitive receiver. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Table 3.13-3 provides a summary of the construction noise levels by each phase at the nearest noise-sensitive receptor. The input and output data are provided in Appendix B. As described above, the nearest sensitive receptors for the purposes of the noise analysis are considered to be the hotel to the northwest of the proposed Project located approximately 150 feet from the Project work area, and the park located approximately 350 feet from the Project work area. Construction noise levels at other sensitive receivers would be lower relative to the values shown in Table 3.13-3.

Table 3.13-3. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (L_{eq} [dBA])	
	Hotel, Northwest of Project (Approx. 150 Feet Away)	Park Northeast of Project (Approx. 350 Feet Away)
Billboard Construction	68	62
Landscaping	74	66

Source: Appendix B
Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibel.

According to Section 9.40.110 of the City's Municipal Code, it is unlawful to operate equipment or perform outside construction or repair work within 500 feet of a residential land use between the hours of 8:00 p.m. of any one day and 7:00 a.m. of the next day, or on Sundays or public holidays such that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance, unless a permit has been obtained in advance. Although nearby off-site residences would be exposed to elevated construction noise levels, the exposure would be short-term and would cease upon completion of Project construction.

Construction activities associated with the proposed Project would take place between 7:00 a.m. and 8:00 p.m. and would not take place on Sundays or public holidays. Therefore, Project construction would not violate the City's standards for construction noise. However, construction noise levels may be higher than existing ambient daytime noise levels. Therefore, noise impacts from construction are considered to be potentially significant. The implementation of mitigation measures **MM-NOI-1** and **MM-NOI-2** would substantially reduce construction noise, reducing the effects to below a level of significance.[13] Therefore, temporary construction-related noise impacts would be **less than significant with mitigation incorporated**.

MM-NOI-1 Construction Hours

Construction activities shall take place during the permitted times and days per Chapter 9.40.110 of the City's Municipal Code. The applicant shall ensure that construction activities are limited to the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday and shall not occur during other hours or on Sundays or public holidays. This condition shall be listed on the Project's final design to the satisfaction of the City Engineering Department.

MM-NOI-2 Construction Noise Reduction

The City of Covina shall require the applicant to adhere to the following measures as a condition of approving the grading permit:

- The Project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by applicant personnel during construction activities, to the satisfaction of the City Engineering Department.
- Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.

[13] Effectiveness of these mitigation measures would vary from several decibels (which in general is a relatively small change) to ten or more decibels (which subjectively would be perceived as a substantial change), depending upon the specific equipment and the original condition of that equipment, the specific locations of the noise sources and the receivers, etc. Installation of more effective silencers could range from several decibels to well over 10 decibels. Reduction of idling equipment could reduce overall noise levels from barely any reduction to several decibels. Cumulatively, however, these measures would result in substantial decreases in construction noise.

Short-Term Off-Site Construction Traffic Noise

Less Than Significant Impact. The Project would result in brief local, short-term increases in roadway noise as a result of construction traffic. Based on information developed as part of the Project's air quality analysis, Project-related traffic would include workers commuting to and from the Project site as well as vendor and haul trucks bringing or removing materials. The highest number of average daily vehicle trips would be 24 one-way worker vehicle trips per day (i.e., 12 round-trips), 18 one-way vendor truck trips per day (i.e., 9 round-trips), and 16 haul truck trips per day (i.e., 8 round-trips), all occurring during the billboard construction phase.

Based upon a review of the traffic survey data near the Project site (City of West Covina 2017), Garvey Street carries approximately 5,000 vehicles per day and Holt Avenue carries approximately 7,700 vehicles per day. Comparing the maximum number of daily construction-related trips (58 trips) to the traffic volumes for the street with fewer daily vehicle trips (5,000 vehicles per day on Garvey Street), the additional vehicle trips would amount to a temporary increase in traffic of approximately 1.2%. Based upon the fundamentals of acoustics, a doubling of traffic (i.e., a 100% increase) would be needed to result in a 3 decibel increase in noise levels, which is the level corresponding to an audible change to the typical human listener. While individual truck pass-bys would be clearly audible, the change in traffic noise levels on the hourly average basis would be negligible. An incremental increase of approximately 1% of traffic volumes would not correspond to an audible or measurable increase, and thus would be less than significant. Therefore, traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project. Impacts from Project-related construction traffic noise would be **less than significant**.

Project Operational Noise

Less Than Significant Impact. The proposed Project would consist of a digital billboard with electrical components, as well as landscaping improvements. Pumps, motors, or other noisy equipment would not be used during standard operations of the billboard or landscaping. Periodic maintenance would be required; however, the maintenance trips are anticipated to be relatively infrequent and would have a negligible effect on roadway traffic noise. Therefore, Project operational noise would be **less than significant**.

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

Less Than Significant Impact. The main concern associated with groundborne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of groundborne vibration are construction activities such as blasting, pile-driving, and heavy earth-moving equipment. The primary source of groundborne vibration occurring as part of the proposed Project would be construction activities.

The heavier pieces of construction equipment associated with this Project, such as a drill rig, would register up to approximately 0.089 inches per second PPV at a distance of 25 feet (FTA 2018). As previously stated, for the purposes of this analysis, the City's threshold for perceptibility (0.010 inches per second) is used as the significance threshold for annoyance from groundborne vibration (City of Covina 1988).

Groundborne vibration is typically attenuated over relatively short distances. At the nearest vibration-sensitive use to the nearest construction area (approximately 150 feet to the northwest of the Project site)

and with the anticipated construction equipment, the vibration level would be approximately 0.006 inches per second PPV, which is below the City's threshold of 0.010 inches per second. As such, there would not be significant groundborne vibration impacts associated with annoyance.

Construction vibration as a result of the proposed Project also would not result in structural building damage, which typically occurs at vibration levels of 0.4 inches per second PPV or greater for standard buildings (FTA 2018). The building adjacent to the Project's construction area (the existing 2-story, on-site office/commercial structure) is not of masonry construction (which may necessitate a more stringent threshold). The heavier pieces of Project-related construction equipment (e.g., the drill rig) are anticipated to operate at least 25 feet from the adjacent on-site building. (This is because the more intensive pieces of equipment are expected to be used for billboard installation and construction, which would not be situated directly adjacent to the on-site building; see Figure 2-1) As such, vibration experienced by the adjacent building is expected to be approximately 0.089 inches per second PPV or less, which would fall below the applicable threshold for structural building damage. Buildings situated further from the Project site, such as the hotel to the northwest, would experience even lower levels of vibration and thus would not be significantly impacted. As such, impacts related to groundborne vibration would be **less than significant**.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact**.** There are no private airstrips in the vicinity of the Project site. The nearest airport is Brackett Field, located approximately 4.5 miles to the east-northeast. The Project area is not located within 2 miles of any public airport, nor is it located within the boundaries of any airport land use plans. Therefore, the proposed Project would not expose or result in excessive airport-related noise for people residing or working in the Project area, and **no impact** would occur.

References

Caltrans (California Department of Transportation). 2013. Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. September 2013.

City of Covina. 1988. *Covina Noise Ordinance, Chapter 9.40, Noise*.

City of West Covina. 2017. *Engineering and Traffic Survey. October 2017*.

FHWA (Federal Highway Administration). 2008. Roadway Construction Noise Model (RCNM), Software Version 1.1. U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division. December 8, 2008.

FTA (Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment Manual. September 2018.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

No Impact. The Project would not include construction or operation of any new residential or commercial land uses and, therefore, would not result in population growth in the Project area. Additionally, the Project does not include any other off-site improvements, including the extension of roads or other infrastructure that could potentially induce unplanned population growth. During the minor construction activities that would be required for the proposed Project, several construction personnel would be required during the construction period. Several workers would also be required for the routine maintenance activities associated with the proposed Project, which would be required about once every other month, with additional maintenance activities possibly being required in the event of inclement weather. Due to the minimal number of workers required for these activities and the routine, brief nature of the construction processes and maintenance activities, the need for workers is expected to be accommodated within the existing and future labor market in the City and the surrounding Los Angeles metropolitan area. As such, the proposed Project would not induce substantial unplanned population growth. There would be **no impact.**

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

No Impact. The Project does not involve the development of housing, nor would it necessitate the removal of housing or the displacement of people. As such, the Project would not displace any people or housing and **no impact** would occur.

References

None.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire protection?

No Impact. New or physically altered government facilities are usually required when the population in a localized area increases substantially such that the existing facilities and services cannot meet the increase in demand. The City contracts with the County of Los Angeles Fire Department to provide fire protection and emergency response services (City of Covina 2000). There are three fire stations within the City: Fire Station 153, located approximately 1.70 miles north of the Project site at 1577 East Cypress Street; Fire Station 154, located at approximately 1.80 miles northwest of the Project site at 401 North Second Avenue; and Fire Station 152, located approximately 2.9 miles northwest of the Project site at 807 West Cypress Street.

The Project would not change the use of any existing buildings resulting in additional occupants and would not result in new buildings requiring fire protection services. Additionally, the Project is located in an urbanized area and would not cause an increase of use on the site such that additional fire services would be required. The proposed billboard's digital faces would require the use of LED bulbs. LED bulbs do not pose an increased risk of fire relative to other lighting sources when they are used for their intended purposes, and when operated and installed in accordance with standard procedures. As such, the Project would not result in the need for construction or expansion of fire facilities, and **no impacts** would occur.

Police protection?

No Impact. The City receives police protection services from the City of Covina Police Department. The Covina Police department is located approximately 1.90 miles northwest of the Project site at 444 North Citrus Avenue. As previously discussed, the Project would not result in population growth, additional

building occupants, or additional buildings. The Project would not cause an intensification of uses over existing conditions such that additional police services would be required. As such, the proposed Project would not create the need for new or expanded police protection facilities, and **no impact** would occur.

Schools?

No Impact. The City is served by the Covina Valley Unified School District. As discussed in Section 3.14, the Project would not generate population growth. Therefore, no new students would be generated by the Project, and no increase in demand for local schools would occur. As such, there would be **no impact.**

Parks?

No Impact. The Project does not include development of residential or commercial uses and would not generate any new permanent residents or employees such that the demand for local park and recreational facilities would occur. As such, the Project would not result in the need for new or expanded park facilities, and there would be **no impact.**

Other public facilities?

No Impact. The Project would not include the development of residential or commercial uses and would not increase the demand for other public facilities, such as libraries. Additionally, as described in Section 3.14, the Project would not result in indirect population growth, which could increase the demand for public facilities. There would be **no impact.**

References

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

No Impact. The nearest park to the Project site, Jalapa Park, is located directly east of the Project site across East Garvey Street. The Project would not generate new or permanent residents that would increase the use of this park or any other existing parks and recreational facilities in the City. Construction personnel working at the Project site could potentially use nearby parks during the temporary construction period. However, due to the limited nature and duration of the construction activities, as well as the minimal required personnel, construction would not introduce new permanent workers to the City such that new park facilities would be required to provide an adequate level of service. Jalapa Park is considered a sensitive receptor for the purposes of the environmental analysis in this IS/MND, particularly within the light/glare and noise analyses. As determined herein, the proposed Project would not have significant, adverse impacts to Jalapa Park. **No impacts** would occur.

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

No Impact. The Project does not include the development of residential uses and would not generate new permanent residents that would increase the demand for recreational facilities. As such, no new or expanded recreational facilities would be included as part of the Project or required as a result of the development of the Project. There would be **no impact.**

References

None.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

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

Less Than Significant Impact. Construction of the Project would generate additional, albeit minimal, vehicle trips in the Project vicinity during the temporary construction period. The Project would not result in obstructions to any roadways or pedestrian walkways. The Project site contains two driveways, one located along the Project site's western boundary, and one located along the Project site's eastern boundary. During construction of the Project, the Project site's western driveway may be inaccessible due to construction activities. These activities, however, would be temporary and the Project site's eastern driveway would remain accessible during construction. Upon the completion of construction, both driveways would be accessible, consistent with existing conditions. Construction activities would involve a maximum of 58 one-way vehicle trips per day (including truck trips and worker vehicle trips). Increases in traffic in the Project area on the order of 58 one-way vehicle trips per day during the construction period would be considered minor and temporary and would not significantly impact the circulation system. Therefore, construction of the Project would not substantially conflict with any program, plan, ordinance, or policy addressing the circulation system.

Operation of the Project would require limited travel necessary for maintenance of the billboard structure, which is anticipated to be required about once every two months, with additional maintenance activities possibly being required in the event of inclement weather. Each maintenance event is expected to be associated with one worker driving to and from the site. Due to the limited frequency and magnitude of these activities, impacts to transit, roadway, bicycle, or pedestrian facilities would not occur. In the context of the City and the Project area, the addition of one vehicle driving to and from the Project site less than one time per month would be considered negligible and would not have the potential to alter the operations of the circulation system.

Overall, the additional vehicle trips required for construction and operations of the Project would be negligible and would not have a substantial effect on the circulation system. Additionally, the Project would not result in the obstruction or closure of any public roadways or pedestrian walkway. Therefore, the Project would not have a substantial adverse impact on the circulation system, and impacts from the proposed Project would be **less than significant**.

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

Less Than Significant Impact. The Project would not generate a significant amount of vehicle miles traveled (VMT). Construction activities would involve a maximum of 58 one-way vehicle trips per day (including truck trips and worker vehicle trips). Once construction is complete, the Project would generate vehicle trips associated with the maintenance of the billboard structure, which is anticipated to be required about once every two months, with additional maintenance activities possibly being required in the event of inclement weather.

VMT is used to measure the performance of the transportation network and to evaluate potential transportation-related impacts on the environment. VMT is often expressed on an efficiency basis (i.e., per unit, per thousand square feet, etc.) to understand whether people are traveling more or less by vehicle over time, across different areas, or across different planning scenarios. As such, construction and maintenance activities are not considered when determining VMT impacts as these trips do not represent permanent changes in the transportation network based on the proposed use. Vehicle trips resulting from

the Project would be limited to construction and maintenance trips. As such, the proposed project would not increase or contribute to VMT in the project area. Impacts would be **less than significant.**

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

Less Than Significant Impact. The Project would not require the closure of any roadway or pedestrian walkway. The Project site contains two driveways, one located along the Project site's western boundary, and one located along the Project site's eastern boundary. During construction of the Project, the Project site's western driveway may be inaccessible due to construction activities. These activities, however, would be temporary and the Project site's eastern driveway would remain accessible during construction. Upon the completion of construction, both driveways would be accessible, consistent with existing conditions. The Project would not involve any permanent alterations to existing roadways, driveways, or the Project site's surface parking lot. As such, the Project would not include any hazardous geometric roadway design features or incompatible uses. While the Project would be associated with new visual elements including digital signage, these elements would be regulated and monitored pursuant to state and local regulations and guidelines. The sign faces would be oriented towards the I-10 freeway, which is a Caltrans facility. Prior to Project implementation, the Project applicant would be required to obtain an Outdoor Advertising Display Permit issued by Caltrans. The Project would be required to comply with the Outdoor Advertising Display Permit requirements, which establish measures regarding the placement and display of billboards located in close proximity to highways under the jurisdiction of Caltrans. These measures establish minimum distances between advertising displays and maximum size for advertising displays (Caltrans 2023). Furthermore, the Project would be required to comply with Chapter 2, Article 3 of the California Vehicle Code, which establishes requirements regarding the placement and brightness of light sources that may affect drivers. Upon compliance with the applicable laws and requirements, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be **less than significant.**

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. Inadequate emergency access may occur if emergency access is obstructed by the Project or if new driveways, roadways, or fire truck turnaround areas are insufficient to accommodate the necessary emergency equipment. As previously discussed, the Project would not result in the closure of any roadways or pedestrian walkways. The Project site contains two driveways, one located along the Project site's western boundary, and one located along the Project site's eastern boundary. During construction of the Project, the Project site's western driveway may be inaccessible due to construction activities. These activities, however, would be temporary and the Project site's eastern driveway would remain accessible during construction. During operation of the Project, both driveways would be accessible. Therefore, the Project would not result in inadequate emergency access, and impacts would be **less than significant.**

References

Caltrans (California Department of Transportation). 2023. Outdoor Advertising Display Permit Requirements. Accessed April 4, 2023. https://dot.ca.gov/programs/traffic-operations/oda/permit-requirements.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less Than Significant Impact. As previously discussed in Section 3.5, records searches at the SCCIC and a Sacred Lands File search of the Project area have been conducted. These searches did not reveal the presence of any previously recorded tribal cultural resources (TCRs) listed in the California Register of Historical Resources or on a local register within or near the Project site. Further, no specific TCRs have been identified by California Native American tribes as part of the City's Assembly Bill (AB) 52 notification and consultation process. Therefore, the proposed Project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Impacts are considered **less than significant**.

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

Less Than Significant Impact with Mitigation Incorporated. There are no resources in the Project area that have been determined by the lead agency to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. Further, no specific TCRs were identified in the Project area by the NAHC, by California Native American tribes, or by the City as part of the AB 52 notification and consultation process.

On February 22, 2023, notification of the proposed Project was sent to California Native American tribal representatives that are traditionally or culturally affiliated with the geographic area. One tribe (Gabrieleno Band of Mission Indians - Kizh Nation ("Kizh Nation")) requested formal consultation via a letter dated March 2, 2023. Via subsequent email communication between the Kizh Nation and the City during July through September 2023, the Kizh Nation identified concerns related to uncovering of previously unidentified TCRs, which could occur during Project construction, particularly during ground-disturbing activities. If resources were to be uncovered but not properly treated, they could be destroyed or damaged, resulting in a potentially significant impact. The City, in coordination with the Kizh Nation, determined that mitigation measures **MM-TCR-1**, **MM-TCR-2**, and **MM-TCR-3** would reduce potential impacts to below a level of significance. (In the event of unexpected discovery of human remains during construction, MM-CUL-2 and MM-TCR-3 would apply.) These measures would ensure that any unanticipated significant discoveries are protected. Consultation was formally concluded between the City and the Kizh Nation via email and written letter on September 11, 2023. Impacts from the proposed Project would thus be **less than significant with mitigation incorporated**.

MM-TCR-1 Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities

- The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any

discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant/lead agency upon written request to the Tribe.

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

MM-TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/ Non-Ceremonial)

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

MM-TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- If Native American human remains and/or grave goods are discovered or recognized on the Project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

References

None.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

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

Less Than Significant Impact. The Project would not substantially increase the amount of water used within the Project area, as no changes to the existing land uses would occur. New landscaping may be installed to replace any landscaping that is removed. However, because such landscaping would replace existing landscaping that is removed, the total irrigation requirements of the Project site are not anticipated to substantially change. As such, any increased water demand at the Project site would be negligible, as the water demand would remain relatively consistent with existing conditions. Additionally, the Project would not have a demand for wastewater services or natural gas. As further described in Section 3.10, the Project would not substantially increase the amount of surface runoff generated at the Project site. As such, the Project would not require additional stormwater drainage infrastructure.

The Project would require electric power for the billboard. The proposed billboard would connect to existing electrical infrastructure on the Project site, which is provided by Southern California Edison. A few feet of trenching would be required to attach the billboard to a transformer that is located on the western portion of the Project site. Construction work required to establish the electrical connection is included as part of the construction scenario that is analyzed herein. As demonstrated throughout this document, significant environmental impacts would not occur as a result of Project construction. Based on information provided by the Project applicant, the proposed Project is anticipated to require approximately 64,800 kWh of electricity per year. In 2022, the total system sales of electricity in Southern California Edison's service area was approximately 84.2 billion kWh (Southern California Edison 2023). The increase in electricity consumption that would be associated with the Project would thus represent approximately 0.00008% of Southern California Edison's total 2022 electricity sales. As such, the amount of electricity needed for Project operations would be minimal compared to existing electricity consumption in the region and would not necessitate new or expanded electrical facilities.

Telecommunications services for the billboard would be established via a modem and would not require additional trenching or an expansion of infrastructure. For the reasons described above, impacts would be **less than significant.**

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

No Impact. The Project would not substantially increase the amount of water used within the Project area, as no changes to the existing land uses would occur. New landscaping may be installed to replace any landscaping that is removed. However, because such landscaping would replace existing landscaping that is removed, the total irrigation requirements of the Project site are not anticipated to substantially change. As such, any increased water demand at the Project site would be negligible, as the water demand would remain relatively consistent with existing conditions. As such, there would be **no impact.**

c) Would the project result in a determination by the waste water 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?

No Impact. The Project would not result in the generation of wastewater or require any wastewater treatment services. As such, there would be **no impact.**

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

No Impact. Construction of the Project would generate minor amounts of solid waste and debris. The Project, however, would not involve demolition or substantial amounts of dirt removal. The Project would incorporate source reduction techniques and recycling measures to divert waste away from landfills, in accordance with City and state requirements. The Project would comply with Section 8.09.040 of the City's Municipal Code, which requires recycling of at least 75% of construction materials that require disposal. All non-recyclable construction waste generated would be disposed of at a landfill approved to accept such materials.

During operation, the Project would not result in the generation of substantial amounts of solid waste. The proposed billboard's LED modules (i.e., one square foot of pixels) would require periodic replacing. Due to

the long lifespan of LED lightbulbs, however, the associated waste would be minimal and would only be produced periodically, as only four to eight modules are expected to be replaced per year per face of the billboard. Therefore, the amount of waste generated by the Project would not be in excess of any standards or in the capacity of local infrastructure. There would be **no impact.**

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

No Impact. The Project would be required to comply with federal, state, and local statutes and regulations related to solid waste. Construction waste would be recycled or disposed of in accordance with all existing regulations, including Section 8.09.040 of the City's Municipal Code, which requires recycling of at least 75% of construction materials that require disposal. During Project operation, spent LED modules would be transported to an appropriate waste facility in accordance with applicable regulations. As such, because all waste materials associated with the Project would be handled and disposed of in accordance with existing local, state, and federal regulations, there would be **no impact.**

References

Southern California Edison. 2023. 2022 Annual Report. Accessed April 4, 2023. https://www.edison.com/investors/financial-reports-information/annual-reports.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

The Project site is not located within a state responsibility area or a VHFHSZ (CALFIRE 2023). The nearest fire hazard severity zone is a VHFHSZ, which generally surrounds the Project site to the east, south, and west, with a small portion of the VHFHSZ overlapping with the southwestern corner of the Project site.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As discussed in Section 3.9(f), the City has prepared the "multi-hazard Covina Emergency Plan," which addresses the City's planned response to emergencies associated with natural disasters and hazardous materials incidents (City of Covina 2000), and the Project would be required to comply with applicable aspects of this plan. Additionally, the City's General Plan Safety Element identifies all major public streets as principal evacuation routes. The Project would not alter any roadways and would not result in a growth in population in the City. Additionally, the Project would not result in a significant increase in traffic volumes, as explained in Section 3.17. As such, the Project would not involve development that would impair the ability of major public streets to serve as evacuation routes. Additionally, the Project would not increase the likelihood of exposure to wildfire at the Project site. As such, **no impacts** would occur.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project site and its immediate surroundings consist of relatively flat land developed with urban uses. The Project would not result in the development of buildings or structures that would be occupied by people and therefore would not expose additional occupants to the risk of wildfire hazards. Furthermore, the implementation of the proposed billboard would not exacerbate the risk of wildfire in the Project area due to its location and use. As such, the Project would not result in the exposure of occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire, and there would be **no impact.**

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The proposed Project does not include the development of any roads, fuel breaks, emergency water sources, or power lines. The Project would require electric power for the proposed billboard. The electrical equipment used to connect the Project to existing electrical infrastructure would be installed underground and thus would not exacerbate wildfire risk. Telecommunications services for the billboard would be provided via a modem. As such, the Project would not require the installation or maintenance of

infrastructure that may exacerbate fire risk or that may result in impacts to the environment. There would be **no impact.**

*d) **Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

No Impact. The Project site is flat and surrounded by urban development. The Project would not include structures with occupants and, as such, would not expose additional people to risks associated with flooding or landslides. As discussed in Section 3.7 and Section 3.10, flooding and landslide is not anticipated to occur on the Project site, and the implementation of the Project would not exacerbate the risk of flooding or landslides. While the Project site is located directly adjacent to and partially overlapping with a VHFHSZ, post-fire hazards are not likely to reach the Project site due to the City's flood and stormwater infrastructure and the surrounding intervening elements of the urban environment, including existing roadways and commercial and residential uses. As such, the Project would not expose people or structures to significant post-fire risks, and there would be **no impact.**

References

City of Covina. 2000. Covina General Plan. March 2000. https://covinaca.gov/city-departments/community-development/planning/.

CALFIRE (California Department of Forestry and Fire Protection). 2023. FHSZ Viewer. Accessed March 8, 2023. https://egis.fire.ca.gov/FHSZ/.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 3.4 of this IS/MND, the Project site is located in a developed and urbanized community and is not expected to support sensitive vegetation, sensitive wildlife, or sensitive habitat. The Project site does, however, support trees that have the potential to support nesting birds and raptors which are protected under the California Fish and Game Code and under the federal Migratory Bird Treaty Act. In the event that any nesting birds or raptors are present during construction activities associated with the Project, the birds and/or raptors would be protected in accordance with mitigation measure **MM-BIO-1**, which would require a pre-construction nesting bird and raptor survey to be completed if construction is initiated during the nesting season. In accordance with mitigation measure **MM-BIO-1**, any nesting birds or raptors that are discovered within or near the Project site would be protected with a no-disturbance buffer. Impacts to biological resources resulting from the proposed Project would therefore be **less than significant with mitigation incorporated**.

As described in Section 3.5 of this IS/MND, the Project site does not support any known important examples of major periods in California history or prehistory. The on-site building at the Project site is not eligible for historic designation under national, state, or local designation criteria because the building is less than 45 years old. The Project, however, would include ground disturbance that could result in the inadvertent discovery of sub-surface archaeological resources or human remains. In the unlikely event that archaeological resources or humans remains were to be discovered during ground disturbing activities associated with the Project, the resource(s) would be protected in accordance with mitigation measures **MM-CUL-1** and **MM-CUL-2**. Additionally, as described in Section 3.18 of this IS/MND, **MM-TCR-1**, **MM-TCR-2**, and **MM-TCR-3** would ensure protection of any TCRs that may be discovered during construction ground-disturbing activities. Therefore, after mitigation, the Project would not eliminate important examples of

major periods of California history or prehistory. For these reasons, impacts to cultural and/or tribal cultural resources resulting from the Project would be **less than significant with mitigation incorporated**.

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

Less Than Significant Impact with Mitigation Incorporated. As described throughout this IS/MND, the Project would result in potentially significant impacts to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources. Mitigation measures have been identified that would reduce these impacts to less than significant levels. Most of these impacts are site-specific in nature and/or limited to the Project's relatively brief construction period (2 weeks) and therefore would not be expected to combine with other projects in the immediate area contributing to a cumulative effect. However, the aesthetics impacts of the project involving light trespass and glare would affect nearby properties in the vicinity of the Project site throughout Project operation. Other development projects in the vicinity with illumination could combine with the proposed Project to create a cumulative effect. Other development in the Project area is anticipated to consist largely of commercial and residential development. Per general plan and zoning requirements, any such future development would be consistent with existing land use patterns and intensities in the Project area and would not be expected to contribute substantial new sources of light/glare. As described in Section 3.1, the City of Covina and adjacent City of West Covina have municipal code provisions limiting light trespass and glare at residential properties, which are considered light-sensitive receptors. These provisions would prevent future development projects in the area from contributing significant, adverse light trespass and glare to residential properties. The Project itself would be required to mitigate light trespass effects to levels more stringent than these municipal code requirements, which would further reduce the potential for the Project to create or contribute to a cumulative effect. In addition to commercial and residential development in the Project area, other billboards could potentially be developed in the future and would have the potential to combine with the Project to produce cumulative aesthetic impacts. However, any future billboard along the I-10 freeway would be subject to Caltrans requirements stating that no digital billboard can be placed within 1,000 feet of another digital billboard on the same side of the freeway (BPC Section 5405(d)). For non-digital billboards, the spacing requirement is 500 feet on the same side of the freeway (BPC Section 5408(d)). These spacing requirements would reduce the potential for overlapping light/glare impacts to occur and would also reduce the potential for visual clutter. Furthermore, any future digital billboards along the I-10 freeway would be subject to the same Caltrans requirements for light and glare control, as described in Section 3.1 of this IS/MND. For these reasons, with implementation of the light/glare mitigation measures identified herein, the Project is not anticipated to contribute or lead to a cumulatively considerable aesthetics impact.

The air quality and GHG analysis presented in Section 3.3 and Section 3.8 of this IS/MND considers cumulative impacts and has determined that cumulative air quality and GHG impacts would not be significant. All reasonably foreseeable future development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. Furthermore, all development projects are guided by the policies identified in the City's General Plan and by the regulations established in the City's Municipal Code. Therefore, compliance with applicable land use and environmental regulations would ensure that environmental effects associated with the Project would not combine with effects from reasonably foreseeable future development in the City or Project vicinity to cause cumulatively

considerable significant impacts. For these reasons, cumulative impacts would be **less than significant with mitigation incorporated**.

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

Less Than Significant Impact with Mitigation Incorporated. Environmental categories typically associated with indirect or direct effects to human beings include aesthetics, air quality, hazards and hazardous materials, noise, and public services. As detailed throughout this IS/MND, the proposed Project would not result in significant impacts in the categories of air quality or public services. However, the proposed Project could result in potentially significant impacts associated with construction activities in the categories of hazards and hazardous materials and noise. With implementation of mitigation measures identified in Section 3.9 and Section 3.13 of this IS/MND, these impacts would be reduced to a less than significant level (mitigation measures **MM-HAZ-1**, **MM-NOI-1**, and **MM-NOI-2**). During operations, the proposed Project could result in potentially significant impacts associated with light and glare. The Project is located in proximity to light-sensitive receptors, such as residential and hotel properties. Without mitigation, the billboard could be sufficiently bright such that significant light trespass and/or glare would occur at light-sensitive properties. However, as described in Section 3.1 of this IS/MND, MM-AES-1 through MM-AES-4 would establish light trespass limits and sign brightness limits for the billboard. These measures would also ensure ongoing monitoring of light/glare and would establish a system for handling any light/glare complaints from the community. With implementation of **MM-AES-1 through MM-AES-4**, the Project's light/glare impacts would be considered less than significant. As such, impacts related to direct or indirect effects on human beings would be **less than significant with mitigation incorporated**.

References

None.

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4 List of Preparers

City of Covina – Lead Agency

Brian K. Lee, AICP – Director of Community Development
Lisette Sanchez-Mendoza – Senior Planner
Daniella Andrade – Management Analyst

Dudek – Environmental Consultant

Nicole Cobleigh – Project Director
Michele Finneyfrock – Project Manager
Armando Gonzales – Environmental Analyst
Nicholas Lorenzen – Air Quality/Greenhouse Gas Specialist
Michael Cady – Senior Biologist
Heather McDaniel McDevitt, MA, RPA – Senior Archaeologist
Audrey Herschberger, PE – Hazards/Environmental Engineer
Michael Greene, INCE Bd. Cert. – Senior Noise Specialist
Christopher Starbird – GIS Specialist

Francis Krahe & Associates – Light/Glare Consultant

Francis J. Krahe, PE/IALD/IES/LC – President

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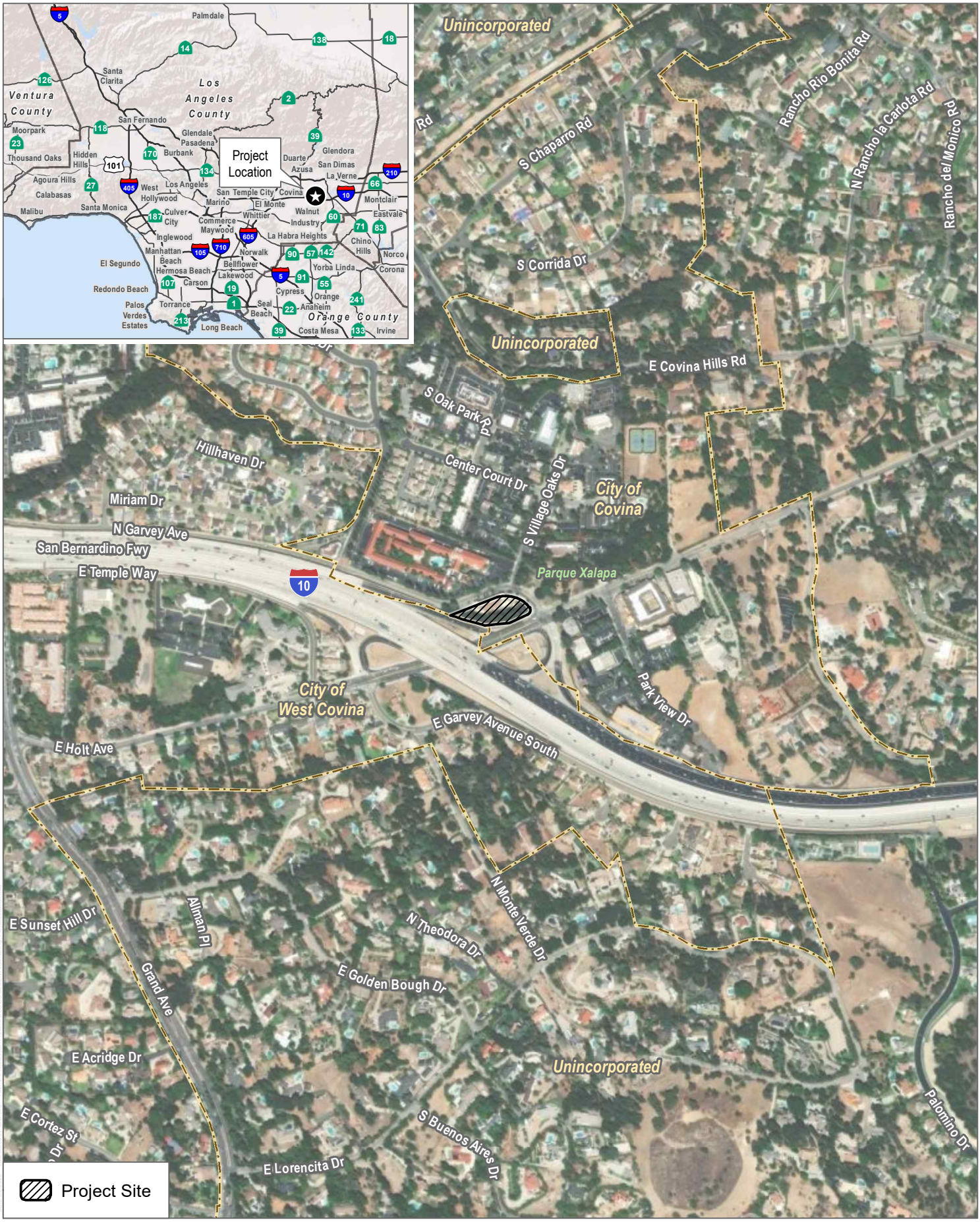

Project Site

SOURCE: Esri and Digital Globe, Open Street Map 2019

DUDEK

0 400 800 Feet

FIGURE 1-1

Project Location

1270 Garvey Street Billboard Project

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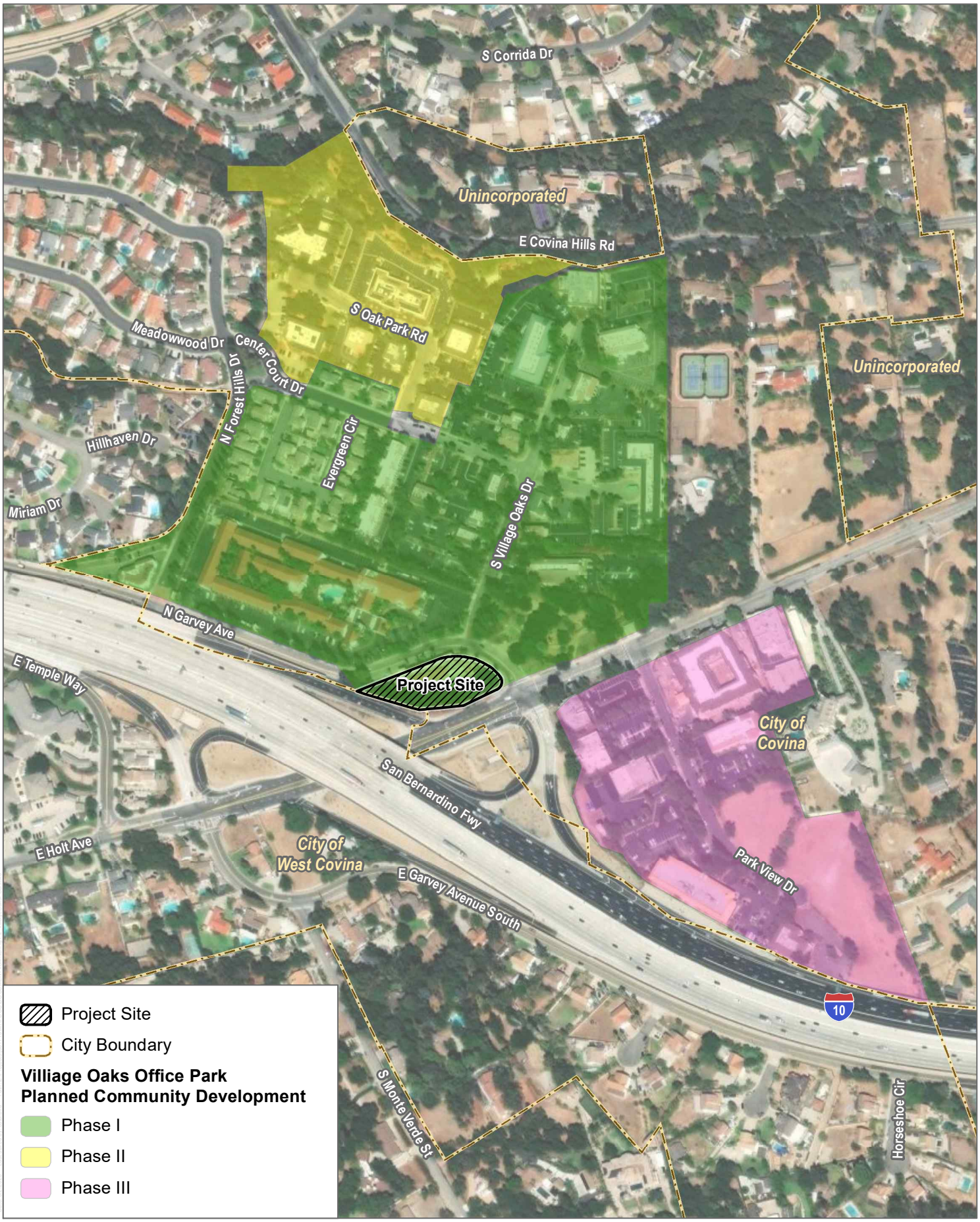

SOURCE: Esri and Digital Globe, Open Street Map 2019

DUDEK

0 220 440 Feet

FIGURE 1-2

Village Oaks Office Park Planned Community Development

1270 Garvey Street Billboard Project

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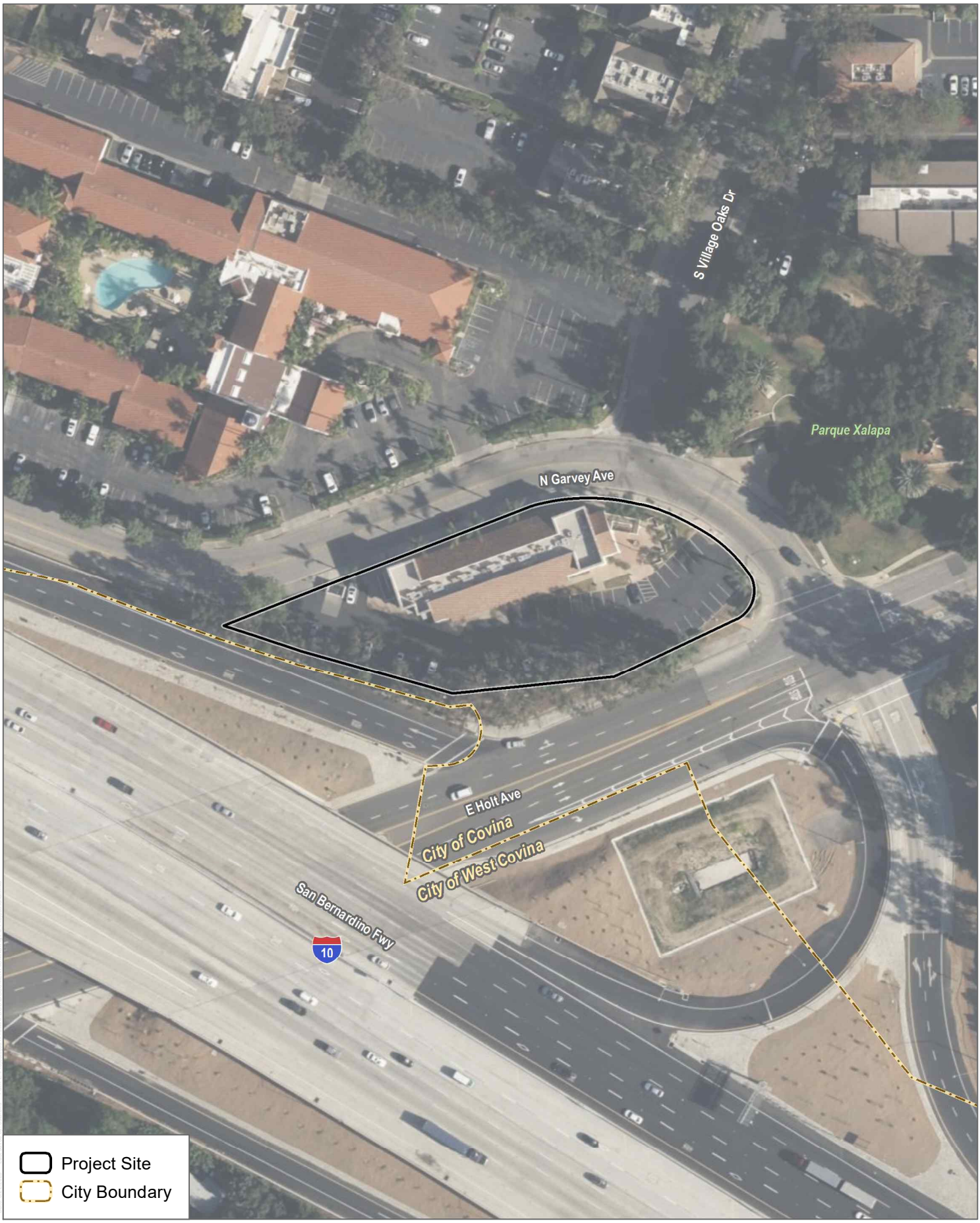

SOURCE: Bing Imagery 2023, Open Street Map 2019

DUDEK

0 50 100 Feet

FIGURE 1-3

Project Site Aerial

1270 Garvey Street Billboard Project

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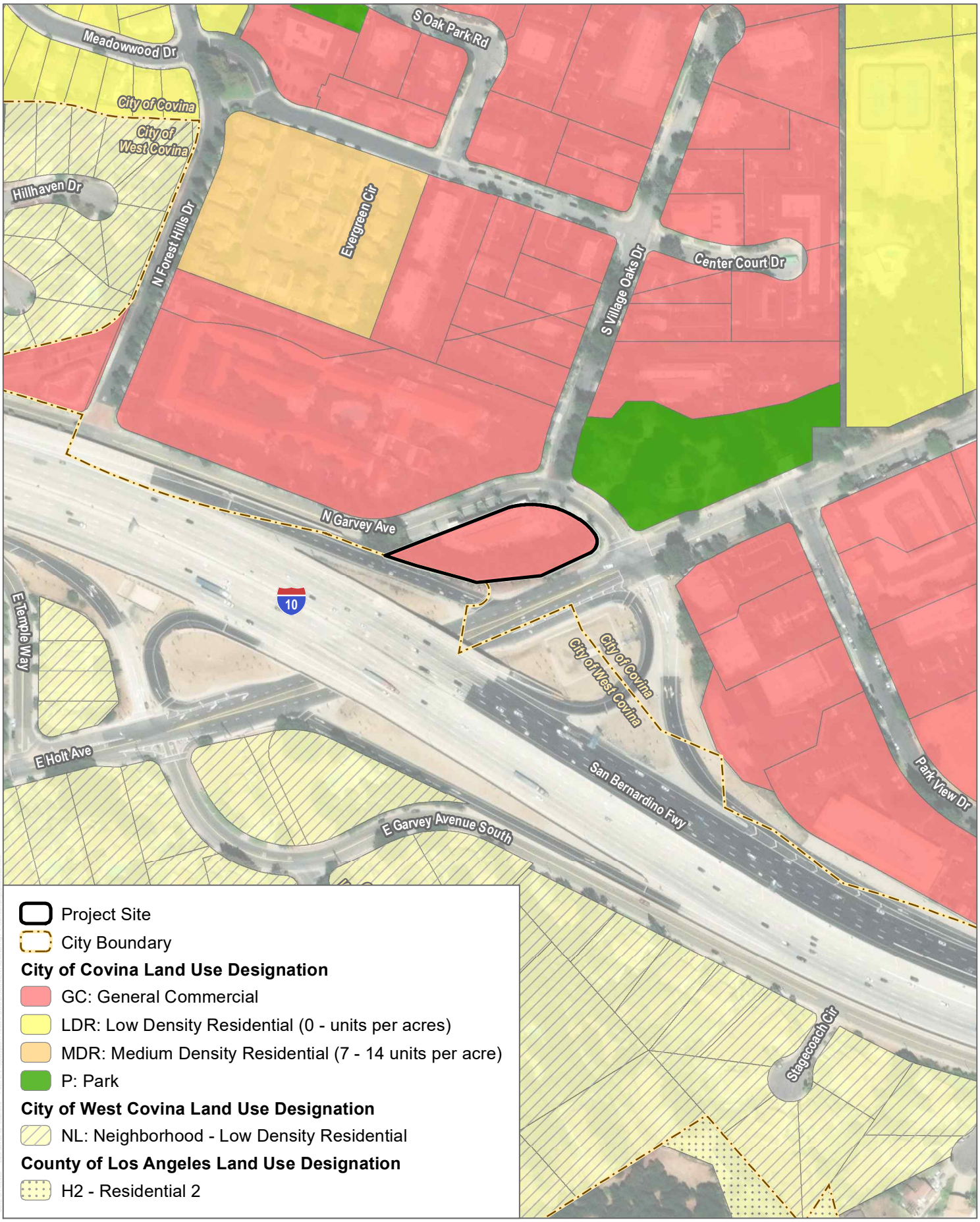

SOURCE: Bing Imagery 2023, Open Street Map 2019

DUDEK

0 125 250 Feet

FIGURE 1-4

Surrounding Land Uses

1270 Garvey Street Billboard Project

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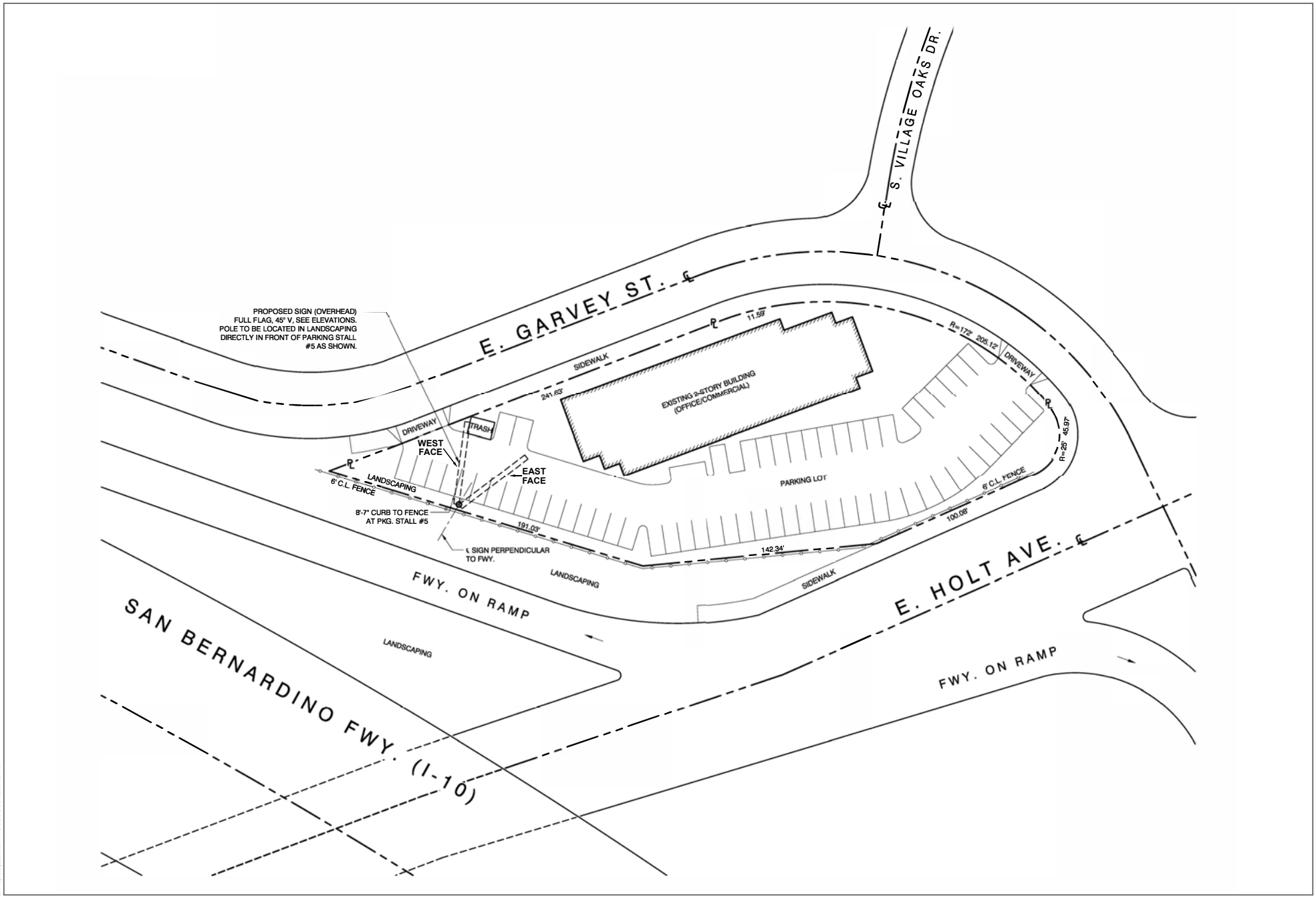

SOURCE: RMG Outdoor Inc. 2017

FIGURE 2-1
Site Plan
1270 Garvey Street Billboard Project

DUDEK

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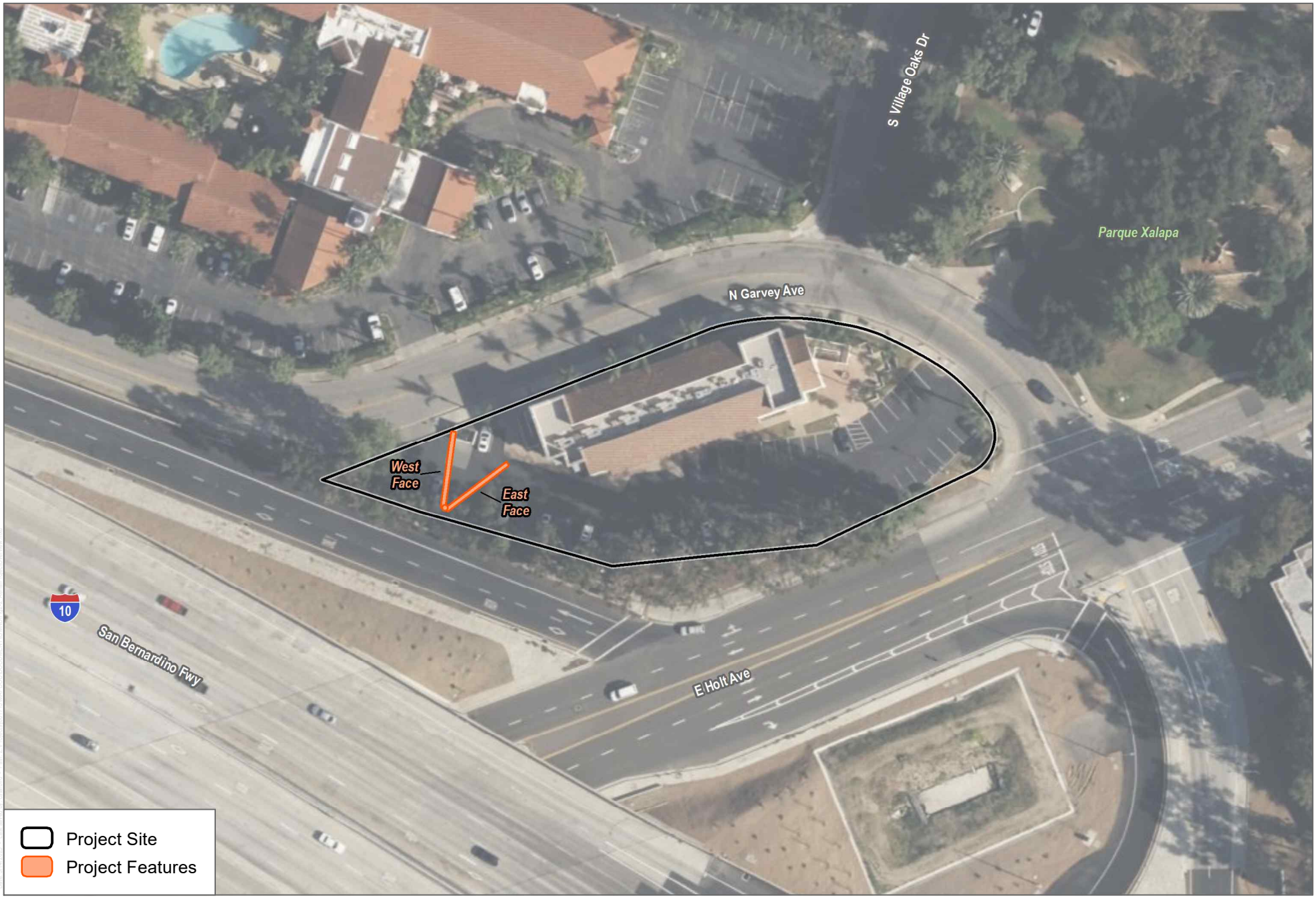

SOURCE: Bing Imagery 2023, Open Street Map 2019

DUDEK

0 40 80 Feet

FIGURE 2-2

Aerial Project Overview

1270 Garvey Street Billboard Project

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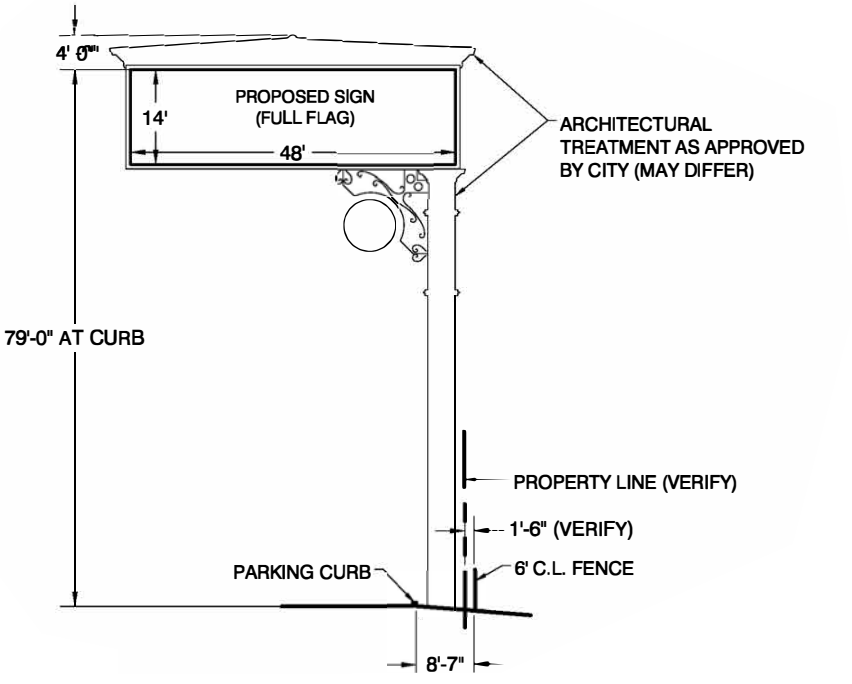
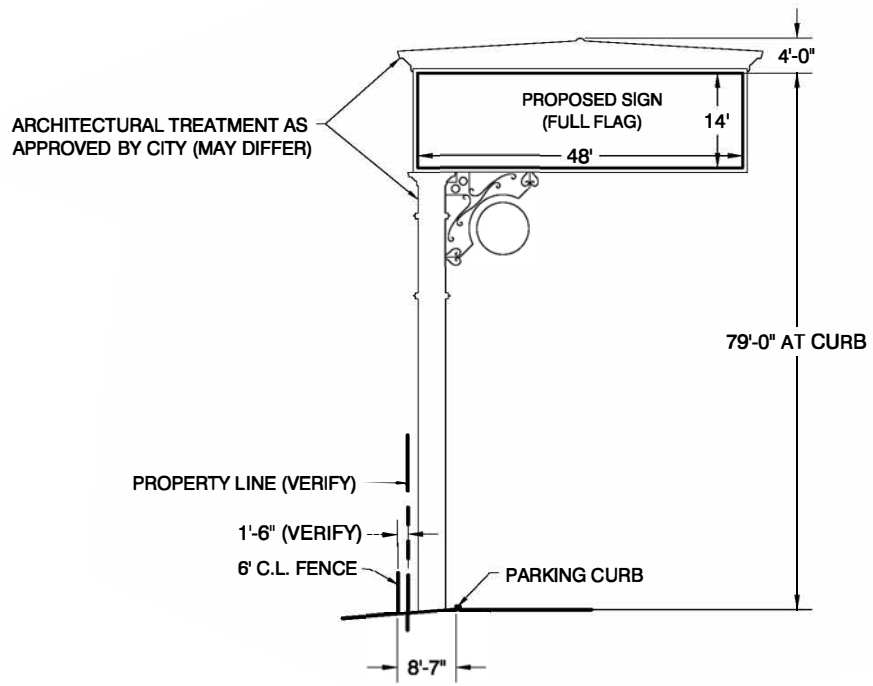


WEST FACE



EAST FACE

SOURCE: RMG Outdoor Inc. 2017

FIGURE 2-3

Project Elevations

1270 Garvey Street Billboard Project

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SOURCE: Bulletin Displays, LLC 2023

FIGURE 2-4A

Project Rendering – East

1270 Garvey Street Billboard Project

DUDEK

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SOURCE: Bulletin Displays, LLC 2023

FIGURE 2-4B

Project Rendering – West

1270 Garvey Street Billboard Project

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Appendix A

Air Quality, Greenhouse Gas Emissions, and Energy Modeling Data

Covina Digital Sign Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Covina Digital Sign
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.60
Precipitation (days)	22.4
Location	34.071105162872215, -117.86378850869406
County	Los Angeles-South Coast
City	Covina
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5038
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
City Park	1.00	Acre	1.00	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-10-A	Water Exposed Surfaces
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.32	1.04	11.7	11.9	0.03	0.41	0.77	1.18	0.38	0.20	0.58	—	4,249	4,249	0.20	0.29	0.15	4,341
Mit.	1.32	1.04	11.7	11.9	0.03	0.41	0.77	1.18	0.38	0.20	0.58	—	4,249	4,249	0.20	0.29	0.15	4,341
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02	0.01	0.15	0.17	< 0.005	0.01	0.01	0.02	< 0.005	< 0.005	0.01	—	54.2	54.2	< 0.005	< 0.005	0.03	55.4
Mit.	0.02	0.01	0.15	0.17	< 0.005	0.01	0.01	0.02	< 0.005	< 0.005	0.01	—	54.2	54.2	< 0.005	< 0.005	0.03	55.4
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.97	8.97	< 0.005	< 0.005	0.01	9.16
Mit.	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.97	8.97	< 0.005	< 0.005	0.01	9.16
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.32	1.04	11.7	11.9	0.03	0.41	0.77	1.18	0.38	0.20	0.58	—	4,249	4,249	0.20	0.29	0.15	4,341
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.02	0.01	0.15	0.17	< 0.005	0.01	0.01	0.02	< 0.005	< 0.005	0.01	—	54.2	54.2	< 0.005	< 0.005	0.03	55.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.97	8.97	< 0.005	< 0.005	0.01	9.16

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.32	1.04	11.7	11.9	0.03	0.41	0.77	1.18	0.38	0.20	0.58	—	4,249	4,249	0.20	0.29	0.15	4,341
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.02	0.01	0.15	0.17	< 0.005	0.01	0.01	0.02	< 0.005	< 0.005	0.01	—	54.2	54.2	< 0.005	< 0.005	0.03	55.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2023	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.97	8.97	< 0.005	< 0.005	0.01	9.16

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	101	101	0.01	< 0.005	0.03	101
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	100	100	0.01	< 0.005	< 0.005	101
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	100	100	0.01	< 0.005	0.01	101
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	16.6	16.6	< 0.005	< 0.005	< 0.005	16.7

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.06	6.06	< 0.005	< 0.005	0.03	6.17
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	94.4	94.4	0.01	< 0.005	—	94.8

Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	101	101	0.01	< 0.005	0.03	101
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	< 0.005	5.88
Area	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	94.4	94.4	0.01	< 0.005	—	94.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	100	100	0.01	< 0.005	< 0.005	101
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.87	5.87	< 0.005	< 0.005	0.01	5.97
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	94.4	94.4	0.01	< 0.005	—	94.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	100	100	0.01	< 0.005	0.01	101
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	15.6	15.6	< 0.005	< 0.005	—	15.7
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.03

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	16.6	16.6	< 0.005	< 0.005	< 0.005	16.7

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.06	6.06	< 0.005	< 0.005	0.03	6.17
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	94.4	94.4	0.01	< 0.005	—	94.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	101	101	0.01	< 0.005	0.03	101
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	< 0.005	5.88
Area	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	94.4	94.4	0.01	< 0.005	—	94.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	100	100	0.01	< 0.005	< 0.005	101
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.87	5.87	< 0.005	< 0.005	0.01	5.97

Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	94.4	94.4	0.01	< 0.005	—	94.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	100	100	0.01	< 0.005	0.01	101
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	15.6	15.6	< 0.005	< 0.005	—	15.7
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.03
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	16.6	16.6	< 0.005	< 0.005	< 0.005	16.7

3. Construction Emissions Details

3.1. Trenching (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.05	0.88	9.26	9.35	0.02	0.39	—	0.39	0.36	—	0.36	—	2,185	2,185	0.09	0.02	—	2,192

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.9	23.9	< 0.005	< 0.005	—	24.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.96	3.96	< 0.005	< 0.005	—	3.98
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.11	0.15	1.67	0.00	0.00	0.31	0.31	0.00	0.07	0.07	—	328	328	0.02	0.01	0.04	332
Vendor	0.05	0.02	0.75	0.37	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	589	589	0.02	0.08	0.04	614
Hauling	0.09	0.02	1.53	0.56	0.01	0.01	0.30	0.32	0.01	0.08	0.10	—	1,147	1,147	0.07	0.18	0.07	1,202
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.65	3.65	< 0.005	< 0.005	0.01	3.70
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.46	6.46	< 0.005	< 0.005	0.01	6.73
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.6	12.6	< 0.005	< 0.005	0.01	13.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.61
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.07	1.07	< 0.005	< 0.005	< 0.005	1.11
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.08	2.08	< 0.005	< 0.005	< 0.005	2.18

3.2. Trenching (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.05	0.88	9.26	9.35	0.02	0.39	—	0.39	0.36	—	0.36	—	2,185	2,185	0.09	0.02	—	2,192
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.9	23.9	< 0.005	< 0.005	—	24.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.96	3.96	< 0.005	< 0.005	—	3.98
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.13	0.11	0.15	1.67	0.00	0.00	0.31	0.31	0.00	0.07	0.07	—	328	328	0.02	0.01	0.04	332
Vendor	0.05	0.02	0.75	0.37	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	589	589	0.02	0.08	0.04	614
Hauling	0.09	0.02	1.53	0.56	0.01	0.01	0.30	0.32	0.01	0.08	0.10	—	1,147	1,147	0.07	0.18	0.07	1,202
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.65	3.65	< 0.005	< 0.005	0.01	3.70
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.46	6.46	< 0.005	< 0.005	0.01	6.73
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.6	12.6	< 0.005	< 0.005	0.01	13.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.60	0.60	< 0.005	< 0.005	< 0.005	0.61
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.07	1.07	< 0.005	< 0.005	< 0.005	1.11
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.08	2.08	< 0.005	< 0.005	< 0.005	2.18

3.3. Trenching (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.26	0.22	1.64	1.88	< 0.005	0.06	—	0.06	0.05	—	0.05	—	244	244	0.01	< 0.005	—	245
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	—	2.69
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.44	0.44	< 0.005	< 0.005	—	0.45
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.08	0.11	1.25	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	246	246	0.01	0.01	0.03	249
Vendor	0.02	0.01	0.25	0.12	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	196	196	0.01	0.03	0.01	205
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.74	2.74	< 0.005	< 0.005	0.01	2.78
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.15	2.15	< 0.005	< 0.005	< 0.005	2.24
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.45	0.45	< 0.005	< 0.005	< 0.005	0.46
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.36	0.36	< 0.005	< 0.005	< 0.005	0.37
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Trenching (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.26	0.22	1.64	1.88	< 0.005	0.06	—	0.06	0.05	—	0.05	—	244	244	0.01	< 0.005	—	245
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	—	2.69
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.44	0.44	< 0.005	< 0.005	—	0.45
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.08	0.11	1.25	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	246	246	0.01	0.01	0.03	249
Vendor	0.02	0.01	0.25	0.12	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	196	196	0.01	0.03	0.01	205

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.74	2.74	< 0.005	< 0.005	0.01	2.78
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.15	2.15	< 0.005	< 0.005	< 0.005	2.24
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.45	0.45	< 0.005	< 0.005	< 0.005	0.46
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.36	0.36	< 0.005	< 0.005	< 0.005	0.37
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.06	6.06	< 0.005	< 0.005	0.03	6.17
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.06	6.06	< 0.005	< 0.005	0.03	6.17
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	< 0.005	5.88
Total	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	< 0.005	5.88
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

City Park	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.06	6.06	< 0.005	< 0.005	0.03	6.17
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.06	6.06	< 0.005	< 0.005	0.03	6.17
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	< 0.005	5.88
Total	< 0.005	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.80	5.80	< 0.005	< 0.005	< 0.005	5.88
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

City Park	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	15.6	15.6	< 0.005	< 0.005	—	15.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	15.6	15.6	< 0.005	< 0.005	—	15.7

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	94.4	94.4	0.01	< 0.005	—	94.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	15.6	15.6	< 0.005	< 0.005	—	15.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	15.6	15.6	< 0.005	< 0.005	—	15.7

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer Products	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landsca Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

4.4.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Total	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Total	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.03

4.5.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Total	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Total	—	—	—	—	—	—	—	—	—	—	—	0.05	0.00	0.05	< 0.005	0.00	—	0.16
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.03

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
New Billboard Construction	Trenching	10/3/2023	10/6/2023	5.00	4.00	—
Landsacping	Trenching	10/7/2023	10/12/2023	5.00	4.00	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
New Billboard Construction	Bore/Drill Rigs	Diesel	Average	1.00	4.00	83.0	0.50
New Billboard Construction	Cranes	Diesel	Average	2.00	6.00	367	0.29
New Billboard Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Landsacping	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
New Billboard Construction	Bore/Drill Rigs	Diesel	Average	1.00	4.00	83.0	0.50
New Billboard Construction	Cranes	Diesel	Average	2.00	6.00	367	0.29
New Billboard Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Landsacping	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
New Billboard Construction	—	—	—	—
New Billboard Construction	Worker	24.0	18.5	LDA,LDT1,LDT2

New Billboard Construction	Vendor	18.0	10.2	HHDT,MHDT
New Billboard Construction	Hauling	16.0	20.0	HHDT
New Billboard Construction	Onsite truck	—	—	HHDT
Landsacping	—	—	—	—
Landsacping	Worker	18.0	18.5	LDA,LDT1,LDT2
Landsacping	Vendor	6.00	10.2	HHDT,MHDT
Landsacping	Hauling	0.00	20.0	HHDT
Landsacping	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
New Billboard Construction	—	—	—	—
New Billboard Construction	Worker	24.0	18.5	LDA,LDT1,LDT2
New Billboard Construction	Vendor	18.0	10.2	HHDT,MHDT
New Billboard Construction	Hauling	16.0	20.0	HHDT
New Billboard Construction	Onsite truck	—	—	HHDT
Landsacping	—	—	—	—
Landsacping	Worker	18.0	18.5	LDA,LDT1,LDT2
Landsacping	Vendor	6.00	10.2	HHDT,MHDT
Landsacping	Hauling	0.00	20.0	HHDT
Landsacping	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
City Park	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
City Park	0.70	0.70	0.70	255	7.26	7.26	7.26	2,650

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
City Park	0.70	0.70	0.70	255	7.26	7.26	7.26	2,650

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
—	—	—	—	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
City Park	64,800	532	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
City Park	64,800	532	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
City Park	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
City Park	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
City Park	0.09	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
City Park	0.09	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	20.0	annual days of extreme heat
Extreme Precipitation	6.45	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	5.36	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	76.9
AQ-PM	87.5
AQ-DPM	51.3
Drinking Water	98.4
Lead Risk Housing	64.3
Pesticides	0.00
Toxic Releases	71.6
Traffic	90.7
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	0.00

Haz Waste Facilities/Generators	44.7
Impaired Water Bodies	33.2
Solid Waste	52.9
Sensitive Population	—
Asthma	28.7
Cardio-vascular	15.3
Low Birth Weights	68.4
Socioeconomic Factor Indicators	—
Education	58.3
Housing	27.8
Linguistic	52.9
Poverty	45.1
Unemployment	1.34

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	72.37264211
Employed	33.01680996
Median HI	59.59194149
Education	—
Bachelor's or higher	53.44539972
High school enrollment	18.81175414
Preschool enrollment	86.8728346
Transportation	—
Auto Access	88.68215065

Active commuting	14.21788785
Social	—
2-parent households	46.0284871
Voting	46.93956114
Neighborhood	—
Alcohol availability	64.48094444
Park access	81.35506224
Retail density	54.43346593
Supermarket access	45.36122161
Tree canopy	31.66944694
Housing	—
Homeownership	61.36276145
Housing habitability	80.35416399
Low-inc homeowner severe housing cost burden	57.73129732
Low-inc renter severe housing cost burden	81.00859746
Uncrowded housing	79.21211344
Health Outcomes	—
Insured adults	59.70742974
Arthritis	89.6
Asthma ER Admissions	61.5
High Blood Pressure	91.4
Cancer (excluding skin)	55.0
Asthma	91.1
Coronary Heart Disease	79.3
Chronic Obstructive Pulmonary Disease	93.7
Diagnosed Diabetes	73.9
Life Expectancy at Birth	67.7

Cognitively Disabled	50.3
Physically Disabled	14.9
Heart Attack ER Admissions	73.4
Mental Health Not Good	76.1
Chronic Kidney Disease	79.8
Obesity	68.0
Pedestrian Injuries	75.2
Physical Health Not Good	78.6
Stroke	84.7
Health Risk Behaviors	—
Binge Drinking	13.6
Current Smoker	82.7
No Leisure Time for Physical Activity	73.6
Climate Change Exposures	—
Wildfire Risk	17.6
SLR Inundation Area	0.0
Children	44.4
Elderly	26.5
English Speaking	72.7
Foreign-born	46.1
Outdoor Workers	61.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	69.5
Traffic Density	90.9
Traffic Access	63.1
Other Indices	—
Hardship	50.2

Other Decision Support	—
2016 Voting	47.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	50.0
Healthy Places Index Score for Project Location (b)	58.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	a
Construction: Off-Road Equipment	a
Construction: Trips and VMT	a
Operations: Vehicle Data	a
Operations: Energy Use	project specific information

Appendix B
Noise Calculations

Construction Noise Model Input / Output

To User: bordered cells are inputs, unbordered cells have formulae

Construction Activity	Equipment	Total Equipment Qty	AUF % (from FHWA RCNM)	Reference Lmax @ 50 ft. from FHWA RCNM	Client Equipment Description, Data Source and/or Notes	Source to NSR Distance (ft.)	*Barrier / Topo Insertion Loss (dB)*	Distance-Adjusted Lmax	Allowable Operation Time (hours)	Allowable Operation Time (minutes)	Predicted 8-hour Leq
New Billboard Construction	Drill Rig Truck	1	20	79		150		69.5	4	240	59
	Crane	1	16	81		175		70.1	6	360	61
	Crane	1	16	81		200		69.0	6	360	60
	Backhoe	1	40	78		175		67.1	7	420	63
	Front End Loader	1	40	79		225		65.9	7	420	61
									Total for New Billboard Construction Phase:		**67.9**
Landscaping	Concrete Saw	1	20	90		150		80.5	8	480	73
										Total for Landscaping Phase:	**73.5**

To User: bordered cells are inputs, unbordered cells have formulae

Construction Activity	Equipment	Total Equipment Qty	AUF % (from FHWA RCNM)	Reference Lmax @ 50 ft. from FHWA RCNM	Client Equipment Description, Data Source and/or Notes	Source to NSR Distance (ft.)	*Barrier / Topo Insertion Loss (dB)*	Distance-Adjusted Lmax	Allowable Operation Time (hours)	Allowable Operation Time (minutes)	Predicted 8-hour Leq
New Billboard Construction	Drill Rig Truck	1	20	79		350		62.1	4	240	52
	Crane	1	16	81		375		63.5	6	360	54
	Crane	1	16	81		400		62.9	6	360	54
	Backhoe	1	40	78		375		60.5	7	420	56
	Front End Loader	1	40	79		425		60.4	7	420	56
									Total for New Billboard Construction Phase:		**61.6**
Landscaping	Concrete Saw	1	20	90		350		73.1	8	480	66
										Total for Landscaping Phase:	**66.1**