



CITY OF WEST COVINA

PLANNING COMMISSION

**OCTOBER 13, 2020, 7:00 PM
REGULAR MEETING**

**CITY HALL COUNCIL CHAMBERS
1444 W. GARVEY AVENUE SOUTH
WEST COVINA, CALIFORNIA 91790**

**Sheena Heng, Chair
Don Holtz, Vice Chair
Gregory Jaquez, Commissioner
Glenn Kennedy, Commissioner
Herb Redholtz, Commissioner**

On March 4, 2020, Governor Newsom proclaimed a State of Emergency in California as a result of the threat of COVID-19. On March 17, 2020, Governor Newsom issued Executive Order N-29-20, suspending certain requirements of the Brown Act relating to the conduct of public meetings. Pursuant to the Executive Orders, Council Members may attend City Council meetings telephonically and the City Council is not required to make available a physical location from which members of the public may observe the meeting and offer public comment.

On June 18, 2020, the California Department of Public Health issued guidance mandating that people in California wear cloth face coverings in specified circumstances, including when they are inside, or in line to enter, any indoor public space.

Due to the ongoing COVID-19 emergency and pursuant to State and County public health directives, the City Council Chambers will have limited seating available on a first-come, first-served basis for members of the public to attend and participate in the Planning Commission meeting in person. All persons attending the meeting are required to wear cloth face coverings and observe social distancing protocols.

Members of the public may also watch Planning Commission the meeting live on the City's website at: <https://www.westcovina.org/departments/city-clerk/agendas-and-meetings/current-meetings-and-agendas> under the "Watch Live" tab or through the West Covina City YouTube channel at www.westcovina.org/LIVE.

If you are experiencing symptoms such as fever or chills, cough, shortness of breath or difficulty breathing, fatigue, or sore throat, the City requests that you participate in the meeting from home by watching the meeting live via the links set forth above.

REMOTE PUBLIC PARTICIPATION: In lieu of attending the meeting in person, members of the public can submit public comments via email or address the Planning Commission by telephone using the methods described below.

EMAILED PUBLIC COMMENT. Members of the public can submit public comments to the City Clerk via e-mail at City_Clerk@westcovina.org. The subject line should specify either “Oral Communications or Public Hearing – 10/13/2020”. Please include your full name and address in your e-mail. All emails received by 4:00 P.M. on the day of the Commission meeting will be posted to the City’s website under “Current Meetings and Agendas” and provided to the Planning Commission prior to the meeting. No comments will be read out loud during the meeting. All comments received by the start of the meeting will be made part of the official public record of the meeting.

TELEPHONIC ACCESSIBILITY. Members of the public that wish to address the Council by telephone during Oral Communications or a public hearing may contact the City Clerk by email City_Clerk@westcovina.org or by telephone (626) 939-8433 by 5:30 P.M. on the day of the Commission meeting for instructions regarding addressing the Planning Commission by telephone during the meeting.

Please turn off all cell phones and other electronic devices prior to entering the Council Chambers

AMERICANS WITH DISABILITIES ACT

The City complies with the Americans with Disabilities Act (ADA). If you need special assistance at Planning Commission meetings, please call (626) 939-8433 (voice) or (626) 960-4422 (TTY) from 8 to 5 Monday through Thursday. Please call at least one day prior to the meeting date to inform us of your particular needs and to determine if accommodation is possible. For sign language interpreter services at Planning Commission meetings, please request no less than four working days prior to the meeting.

PUBLIC COMMENTS/ADDRESSING THE COMMISSION

Any person wishing to address the Planning Commission on any matter listed on the agenda or on any other matter within their jurisdiction is asked to complete a speaker card that is provided on the speaker podium and submit the card to a Planning Department staff member.

Please identify on the speaker card whether you are speaking on an agenda item or non-agenda item. Requests to speak on non-agenda items will be heard during “Oral Communications” before the Public Hearing section of the agenda. Oral Communications are limited to thirty (30) minutes. Generally, comments are limited to five minutes per speaker unless further time is granted by the Chairperson. ***The Chairperson may also, at his or her discretion, further limit the time of each speaker in order to accommodate a large number of speakers and/or to ensure that the business of the Planning Commission is effectively conducted.***

Any testimony or comments regarding a matter set for Public Hearing will be heard during the public hearing for that item.

Next Resolution No. 20-6046

MOMENT OF SILENT PRAYER/MEDITATION

PLEDGE OF ALLEGIANCE

ROLL CALL

APPROVAL OF MINUTES

1. Regular meeting, September 22, 2020

ORAL COMMUNICATIONS

This is the time when any member of the public may speak to the Commission on any matter within the scope of duties assigned to the Commission relating to non-agendized or consent calendar items. Other matters included on this agenda may be addressed when that item is under consideration. For all oral communications, the chairperson may impose reasonable limitations on public comments to assure an orderly and timely meeting. The Ralph M. Brown Act limits the Planning Commission and staff's ability to respond to public comments at this meeting. Thus, your comments may be agendized for a future meeting or referred to staff. The Commission may ask questions for clarification, if desired, at this time.

By policy of the Commission, Oral Communications at this time on the agenda is limited to a total of 15 minutes. Persons who are not afforded the opportunity to speak at this time may do so under "Continuation of Oral Communications" later on the agenda.

PUBLIC HEARINGS

2. **PRECISE PLAN NO. 20-05**
PROJECTS PURSUANT TO A SPECIFIC PLAN
APPLICANT: Tony Blakely of Emanate Health
LOCATION: N/E Corner of 1115 S. Sunset Avenue (former Sunset Field Park site)
REQUEST: The applicant is proposing the development of the site from a vacant parcel to a 403-space parking lot intended to serve visitors, patients, and staff for Queen of the Valley Hospital. The project includes proposed surface parking, parking lot lights, landscaping, and an 8'-0" tall wall along the property line (adjacent to residential).

NON-HEARING ITEMS

3. **SUBCOMMITTEE FOR DESIGN REVIEW NO. 20-79**
APPLICANT: Jay Summers
LOCATION: 1615 Cambridge Court
REQUEST: The applicant is requesting to construct a 77-square foot entry porch and an 80 square foot deck on the front elevation of the single-family residence.
4. **INITIATION OF CODE AMENDMENT NO. 20-08**
GENERAL EXEMPTION
APPLICANT: City of West Covina
LOCATION: Downtown Plan Area
REQUEST: To initiate a code amendment that consist of certain changes to the West Covina Downtown Plan & Code.

TEN-DAY APPEAL PERIOD: Actions taken by the Planning Commission that are not recommendations to the City Council will become final after ten (10) calendar days unless a written appeal with the appropriate fee is lodged with the City Clerk's Office before close of business on the tenth day.

COMMISSION REPORTS/COMMENTS AND MISCELLANEOUS ITEMS

This is the time when any member of the Commission may bring a matter to the attention of the full Commission that is within the scope of duties assigned to the Commission. Any item that was considered during the Agenda is not appropriate for discussion in this section of the agenda. NO COMMISSION DISCUSSION OR ACTION CAN BE CONSIDERED AT THIS TIME. If the Commission desires to discuss an issue raised by a speaker or take an action, the Commission may vote to agendaize the matter for a future meeting.

5. COMMUNITY DEVELOPMENT DIRECTOR'S REPORT:

- a. Forthcoming - November 10, 2020

6. CITY COUNCIL ACTION:

This is an oral presentation of City Council matters and actions, which are in the Commission's area of interest

ADJOURNMENT

City of West Covina
A G E N D A

ITEM NO. 1.

DATE: October 13, 2020

TO: Planning Commission
FROM: Planning Division
SUBJECT: Regular meeting, September 22, 2020

Attachments

Minutes 9.22.20

**These minutes are preliminary and are considered unofficial
until adopted at the next Planning Commission meeting.**

A G E N D A

DATE: October 13, 2020

ITEM NO.: 1

**MINUTES
REGULAR MEETING OF THE PLANNING COMMISSION
CITY OF WEST COVINA
Tuesday, September 22, 2020**

The regular meeting of the Planning Commission was called to order at 7:00 p.m. in the West Covina Council Chambers. The Commission observed a moment of silent prayer/meditation and Commissioner Redholtz lead the Pledge of Allegiance.

ROLL CALL

Present: Heng, Holtz, Jaquez, Kennedy and Redholtz

Absent: None

City Staff Present: Persico, Burns, Tsai

APPROVAL OF MINUTES:

1. Regular meeting, August 25, 2020

The minutes were approved as submitted.

OTHER MATTERS OR ORAL COMMUNICATIONS

None

PUBLIC HEARINGS

2. ADMINISTRATIVE USE PERMIT NO. 17-15
SUBCOMMITTEE FOR DESIGN REVIEW NO. 17-27
TREE REMOVAL PERMIT NO. 20-09
CATEGORICAL EXEMPTION

APPLICANT: Hai Xin

LOCATION: 1140 Spring Meadow Drive

REQUEST: The project consists of an administrative use permit (AUP), subcommittee for design review, second unit review (SUR) and a tree removal permit to construct a 9,869 square-foot new two-story house with second-floor balconies/decks, a 708-square foot detached accessory dwelling unit (ADU), an 896-square foot detached 3-car garage, a 2,105-square foot recreational vehicle garage with a workshop, a series of retaining walls (8' 0" maximum height), and a wood deck. The project requires approval of an AUP because the proposed two-story house exceeds the maximum unit size by no more than 25%, the project involves retaining walls higher than four feet, the project involves second floor balconies/decks, and accessory structures exceeding 1,000 square feet in size in size

are proposed. A tree removal permit is required for the removal of two 16' palm trees, one 30' palm tree, and one 6' oak tree. A second unit review (SUR) application was submitted for the ADU. Although the ADU is subject to subcommittee for design review, the Planning Commission cannot take action on the SUR application since a SUR application is ministerial.

Planning Manager Jo-Anne Burns presented the staff report. During her presentation she reviewed the list of entitlements necessary and spoke about the trees that would be removed as part of this application. In addition she reviewed the floor plans, retaining walls and landscaping on the property. She told the Commission the applicant was proposing a large deck/balcony and recommended that a portion of the balcony be removed. She also told the Commission that the proposed home was 2.77 times larger than other homes in the area and added that the adjacent neighbor's pool was visible from the subject property, infringing on their privacy.

Commissioner Redholtz asked about the Code Enforcement cases pending on the property and if there was any resolution. Staff told him that the property owner was working with Engineering to resolve the unpermitted grading issues. There was also a discussion regarding advertising the property as a short-term rental. In addition, the Commission asked questions regarding the Buddhist temple and meditation center. The Commission also discussed the illegal grading and asked who performed the work and if the grading was done by a licensed contractor without permits. In addition, staff told the Commission that Code Enforcement had not seen evidence of a temple operating on the property. The Commission also looked at the original footprint of the existing home and further discussed the retaining walls.

Chairperson Heng opened the public hearing.

PROPONENTS:

George Shu, designer for the project, and Ji Li were present to represent the applicant. Commissioner Redholtz asked them about the unpermitted grading, and the advertisements indicating that the property is available as a vacation rental. The applicant's representatives told the Commission that they had been hired to complete this project three weeks ago and could not answer questions pertaining to work done by the owner before they were hired. They introduced a woman who was living in the home and she answered questions by the Commission regarding why she was living in the home and if she was renting it from the owner. Another witness from the construction company told the Commission that the owner was a famous Buddhist monk who had a very large family. He also told the Commission that the applicant was out of the country working on other projects.

OPPONENTS:

Michael Good via Zoom, representing William and Pearl Good, Michael McGrade, Don Lawson, Sherry Nign, Neil Neih, Camille Brunsdon, Shirley Lee and Colleen Rozatti spoke in opposition.

The opponents spoke about issues with the septic tank on the property that leaked because the applicant broke a pipe during the grading of the property, concerns with the environmental impact due to the removal of the large oak tree, and loss of natural wildlife in the area, infringement on the adjacent residents' privacy, Code Enforcement cases due to the unpermitted grading, the status of the property as a non-profit organization, advertising of this property as a short-term rental on various travel websites, shuttle buses that are coming and going from the property on a daily basis, possible Health Department violations due to the break in the pipe to the septic tank, the existing shack on the property, the owner's failure to comply with stop-work orders issued by the City, the filling of a ravine that existed on the property by the owner for use as a parking lot, the use of the property as a temple, as well as existing cypress trees that are growing under the Edison power lines and inaccessible from the subject property.

REBUTTAL:

The applicant's architect and design team said they would consider all the testimony by the opponents and work the neighbors to address all their concerns. There was a discussion between the Commission and the applicant's representatives regarding the legal ownership of the property, the illegal grading and who completed the unpermitted grading and work on the property. Commissioner Jaquez said he would like the unpermitted work corrected. The owner's representatives said they didn't know who performed the work, since they had recently been hired to design and build the proposed house. They added that the owner was a monk and the home would be his primary residence.

Chairperson Heng closed the public hearing.

There was a discussion by the Commission regarding the proposed project and the Commission's inability to access the subject property. In addition, Commissioner Kennedy expressed his concern with the use of the proposed home. Commissioners Jaquez and Redholtz also expressed their concerns with past unpermitted work that has taken place on the property, testimony of some of the residents and the lack of information provided by the property owner's designer and architect. Commissioner Holtz indicated that he would need to have more information regarding this project and expressed his preference to be allowed to visit the site prior to making a decision. Chairperson Heng also expressed her concern with lack of information and the inability of the Commissioners to access the property. She suggested that this hearing be continued to a date uncertain to allow the applicant time to answer their questions and concerns with the project and possible resolutions to other existing problems on the property. Commissioner Holtz also asked staff to research the legal ownership of the property.

During this discussion the Commission requested that staff send out new public hearing notices when this matter is rescheduled for hearing before the Planning Commission, and requested that the radius be extended from 300 feet to 1,000 feet to provide for better notification of residents in the area.

Motion by Redholtz, seconded by Holtz, to continue this matter to a date uncertain to allow time for the Planning Commission to visit the site, for staff to obtain ownership information, and to expand the public hearing notification to a 1,000-foot radius. Motion carried 5-0.

Chairperson Heng said this matter will be rescheduled for a public hearing before the Planning Commission on a date to be determined.

Chairperson Heng called a recess at 9:15 p.m.

Chairperson Heng reconvened the meeting at 9:27 p.m.

3. CODE AMENDMENT NO. 20-07

GENERAL EXEMPTION

LOCATION: City Wide

REQUEST: The proposed code amendment consists of an amendment to Chapter 26 (Zoning) of the West Covina Municipal Code to allow and regulate off-sale (retail sales for off-site consumption of beer and wine as an accessory use to a service station.

Planning Manager Jo-Anne Burns presented the staff report. During her presentation she told the Commission that this matter had been considered less than one year ago and, as such, she was presenting the code amendment as it was drafted a year ago. She reviewed the proposed changes to Sections 26-597, 26-664 and 26-685.103. In addition she presented the wording from the Department of Alcohol and Beverage Control for the required signage. Ms. Burns also told the Commission that she had checked the ABC website to determine how many off-sale licenses are in West Covina as well as checking with the city's independent contractor for business licenses, HdL.

Chairperson Heng opened the public hearing.

PROPOSERS:

Rich Brito, Sally Morales and Rommel Cipriano, for Mr. Karimi, spoke in favor of the code amendment saying they support the expanded business in service station convenience stores.

OPPOSERS:

Kim Sutcliffe, Fred Sykes, Steve Bennet, Colleen Rozatti and Robert Torres spoke in opposition to the code amendment. They expressed their concern with drinking and driving, public safety, and compromising the standard of living in West Covina. In addition, the opponents expressed their concern with endangering residents, increased service calls to the police department and preserving West Covina's ability to prohibit the sale of beer and wine at service station convenience stores.

Planning Manager Jo-Anne Burns said an email in opposition to this request was received from Jerri Potras and read it into the record.

Chairperson Heng closed the public hearing.

Commissioner Redholtz commented that this matter has been considered numerous times by the Planning Commission and City Council. He also commented that the request isn't to increase revenue but to allow service stations with convenience stores to compete with other convenience stores not associated with service stations. In addition he said he would not be in favor of reducing the floor area to allow more service station convenience stores to sell alcoholic beverages and that there were conditions proposed to regulate the sales of beer and wine in service station convenience stores.

Chairperson Heng expressed her concern with the code amendment, including that police will not remove intoxicated people from convenience stores and they might attract homeless people to purchase alcoholic beverages.

Motion by Jaquez, seconded by Heng, to recommend to the City Council approval of Code Amendment No. 20-27, with a request to the City Manager to direct the West Covina Police Department to provide the City Council with a statistical analysis of service calls for police in neighboring cities where sales of beer and wine are allowed in service station convenience stores. Motion carried 5-0.

This matter will be considered by the City Council at a public hearing scheduled for October 6, 2020.

NON-HEARING ITEMS - None

COMMISSION REPORTS/COMMENTS AND MISCELLANEOUS ITEMS

Commissioner Holtz said that Sizzler USA has filed for bankruptcy. There was a short discussion regarding whether the West Covina Sizzler will be affected.

Commissioner Redholtz spoke about the City of Pasadena Planning Commission recommending to the City Council that they increase penalties for unlicensed contractors working in the City.

Commissioner Jaquez asked about the process to be utilized in rewriting the Municipal Code.

Plaza West Covina has been sold by Starwood and there was a short discussion regarding the potential project that had been proposed for the site.

4. COMMUNITY DEVELOPMENT DIRECTOR'S REPORT:

a. Forthcoming – October 13, 2020

Acting Community Development Director Mark Persico said the Queen of the Valley proposed parking lot will be considered by the Planning Commission at their next regular meeting, October 13, 2020. He also announced that there will not be a meeting on November 10, 2020 and asked who will be attending the November 24, 2020 regular meeting to determine if there will be a quorum.

b. Subcommittee for Design Review Minutes – July 14, 2020 and August 25, 2020

6. CITY COUNCIL ACTION:

None

ADJOURNMENT

Chairperson Heng adjourned the meeting at 11:04 p.m.

Respectfully submitted:

Lydia de Zara
Senior Administrative Assistant

ADOPTED AS SUBMITTED ON:

ADOPTED AS AMENDED ON:

PLANNING DEPARTMENT STAFF REPORT

SUBJECT

PRECISE PLAN NO. 20-05

PROJECTS PURSUANT TO A SPECIFIC PLAN

APPLICANT: Tony Blakely of Emanate Health

LOCATION: N/E Corner of 1115 S. Sunset Avenue (former Sunset Field Park site)

REQUEST: The applicant is proposing the development of the site from a vacant parcel to a 403-space parking lot intended to serve visitors, patients, and staff for Queen of the Valley Hospital. The project includes proposed surface parking, parking lot lights, landscaping, and an 8'-0" tall wall along the property line (adjacent to residential) .

BACKGROUND

The Queen of the Valley Hospital Specific Plan was originally adopted on April 15, 1987. The original Specific Plan allowed for the most recent improvement at the hospital – the Martin Family Birth and Newborn Center, which was constructed in 2000. In order to provide additional parking and to improve the Queen of the Valley campus to meet seismic requirements set under SB 1953 (Alfred E. Alquist Hospital Facilities Seismic Safety Act) by 2030, significant upgrades and improvements are necessary to continue operation of the hospital.

On February 19, 2019, the City Council adopted Ordinance No. 2461 to change the zoning from Multi-Family Residential (MF-20) to Specific Plan for the former Sunset Field park site and to adopt the Queen of the Valley Hospital Specific Plan (SP-1) as the zoning for 1115 and 1135 S. Sunset Avenue. The new Specific Plan allows for future expansion of the campus from approximately 1.09 million square feet to approximately 1.58 million square feet, for an additional 490,000 square feet of development.

The project site is a 146,490 square foot parcel, which was the former Sunset Field Park located on the northeast corner of the Queen of the Valley Hospital property. The site is largely undeveloped and contains a mixture of live vegetation, weeds, and remnants from the old baseball fields such as light standards and fencing.

ITEM	DESCRIPTION
ZONING AND GENERAL PLAN	General Plan: "Commercial" Zoning: "Specific Plan" (SP-1)
SURROUNDING LAND USES AND ZONING	North: R-1 (Residential Single Family) Apartments and medical offices zoned MF-20 (Residential 20 du/ac), O-P (Office Professional), respectively. South: Medical offices zoned O-P (Office Professional) and N-C (Neighborhood Commercial). East: Single-family homes and a vacant lot across S. Sunset Avenue zoned R-1 (Residential Single Family) and N-C (Neighborhood Commercial), respectively West: Orangewood Park and single-family homes across Walnut Creek Wash zoned O-S (Open Space) and R-1 (Residential Single Family), respectively.
CURRENT DEVELOPMENT	The site is within the Queen of the Valley Hospital campus. The subject parcel was formerly Sunset Field Park. The area is largely undeveloped and contains a mixture of live vegetation, weeds, and remnants from the old baseball fields (e.g. lights, fencing).
LEGAL NOTICE	Notices of Public Hearing have been mailed to 463 owners and occupants of properties within 300 feet of the subject site. The Public Hearing Notice was also published in the newspaper and the City's website.

DISCUSSION

The site is a part of the Queen of the Valley Hospital campus and is directly adjacent to and accessible from the hospital's existing parking lot. The project would enlarge the hospital campus' parking lot area and involves the development of a surface parking lot with 403 parking stalls: 265 standards parking spaces (8.5 feet wide by 18 feet deep), 100 compact parking spaces (8 feet wide by 16 feet deep), and 38 electric vehicle charging station parking spaces. The proposed parking lot would include 25-foot wide drive aisles that would allow vehicles to circulate throughout the site.

Landscaping and Property Line Walls

There are no protected trees on the project site. The project, however, would require the removal of approximately 25 non-protected trees. The applicant is proposing to install 41 trees consisting of 21 - 24" box sized Strawberry or African Sumac trees, six 15 gallon size Desert Museum Palo Verde trees, and four 15 gallon size Western Bud trees. As required by the Specific Plan, a 10-foot wide landscaped area and an 8-foot tall block wall would be installed along the north and west property lines, adjacent to the

neighboring multifamily residential use. In addition, landscape planters would also be installed at the end of each row of parking spaces and along the west side of the parcel, in between spaces on the subject site and existing parking spaces on the hospital campus. Overall, 16,980 square feet of landscaping would be installed on the project site (12-percent landscaping), exceeding the 8-percent minimum landscaped area required by the Specific Plan.

Lighting

The project also involves the installation of 29 parking lot light fixtures (20 single head/fixture arrangements and 9 double "back-back" head/fixture arrangements). The proposed light fixtures would be 25 feet in height. The design of the light fixtures are similar to the existing light fixtures on the Queen of the Valley Hospital campus parking lot. A condition of approval has been included in the resolution requiring the light fixtures closest to the north and east property lines to be no taller than 20 feet in height as required by the Specific Plan. A revised photometric plan would be required to be submitted to the Planning Division indicating that light will not spill onto the surrounding uses.

REQUIRED FINDINGS

The following findings are required to be made in order for the Planning Commission to approve the Precise Plan:

a. The proposed development plans and the uses proposed are consistent with the General Plan and any applicable specific plan.

The project is a request for a Precise Plan to allow for the development of a surface parking lot accommodating 403 parking spaces. The project site is designated as "Commercial" in the City's General Plan and is zoned "Specific Plan" (SP-1). The proposed development is consistent with the General Plan land use designation and zoning for the site. The proposed project is consistent with the following General Plan policies:

- Our Prosperous Community P2.4 Build on and grow West Covina's regional appeal
- Our Prosperous Community P2.7a Explore health/medical campus opportunities
- Our Prosperous Community P2.9 Support local businesses.
- Our Well Planned Community P3.5 Support the growth of Queen of the Valley Hospital while developing a unifying vision and code for Sunset Avenue

b. The proposed development is consistent with adopted development standards for the zone and complies with all other applicable provisions of the Municipal Code.

The project involves the development of a surface parking lot with 403 parking stalls. The site is located within the Queen of the Valley Hospital Specific Plan (SP-1) area. As conditioned, the project will comply with all development standards within the Specific Plan, including incorporating a 10-foot wide landscaping buffer and 8-foot high wall adjacent to the neighboring residential properties, and ensuring that the parking lot lighting will not spill onto the surrounding uses.

c. Granting the permit would not be detrimental to the public interest, health, safety, and welfare and would not unreasonably interfere with the use or enjoyment of property in the vicinity of the subject property.

The project site is adjacent to a two-story multifamily residential apartment complex to the northeast and single-family residential to the north across Walnut Creek Wash. The project is designed to be compatible with the uses within the vicinity and would not be detrimental to the public interest, health, safety, and general welfare and would not unreasonably interfere with the use and enjoyment of property.

d. The site is physically suitable for the type, density and intensity of the development being proposed, including vehicle access and circulation, utilities, and the absence of physical constraints.

The proposed development will expand the Queen of the Valley Hospital campus parking lot. The site is directly accessible from the campus parking lot area. The project is an infill development and is located within an urbanized area where utility connections are readily available.

e. The architecture, site layout, location, shape, bulk and physical characteristics of the proposed development are compatible with the existing and future land uses, and do not interfere with orderly development in the vicinity.

All aspects of the site development are compatible with the existing and future land uses and do not interfere with orderly development in the vicinity. All site improvements and proposed landscaping will enhance the overall appearance of the site.

GENERAL PLAN CONSISTENCY

The City's General Plan Land Use Element designates the subject property for Commercial Uses. The project is consistent with the following General Plan policies:

- Our Prosperous Community P2.4 Build on and grow West Covina's regional appeal
- Our Prosperous Community P2.7a Explore health/medical campus opportunities
- Our Prosperous Community P2.9 Support local businesses.
- Our Well Planned Community P3.5 Support the growth of Queen of the Valley Hospital while developing a unifying vision and code for Sunset Avenue

ENVIRONMENTAL DETERMINATION

The project is exempt from additional environmental review under Section 15182 (Projects Pursuant to a Specific Plan), pursuant to the requirements of the California Environmental Quality Act of 1970 (CEQA), because the project is consistent with standards and policies established by the City of West Queen of the Valley Specific Plan No. 1 (SP-1) and its adopted EIR. The City certified an EIR for Specific Plan No. 1 on November 6, 2019.

A CEQA Consistency Evaluation Memorandum (Attachment No. 2) was prepared by Psomas, the City's environmental consultant, concluding that the project does not represent substantial changes from the previously approved Specific Plan and would not have any new or substantially more severe impacts than what was evaluated in the Certified Final Program Environmental Impact Report (PEIR).

STAFF RECOMMENDATIONS

Planning staff recommends that the Planning Commission adopt a resolution approving Precise Plan No. 20-05.

LARGE ATTACHMENTS

Plans are available to the public for review at West Covina City Hall. Since City Hall is currently closed to the public due to COVID 19, please contact (626) 939-8422 to make arrangements with staff to view the plans.

Submitted by: Jo-Anne Burns, Planning Manager

Attachments

Attachment No. 1 - Resolution of Approval

Attachment No. 2 - CEQA Consistency Evaluation Memorandum

PLANNING COMMISSION

RESOLUTION NO. 20-###

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST COVINA, CALIFORNIA, APPROVING PRECISE PLAN NO. 20-05

PRECISE PLAN NO. 20-05

CATEGORICAL EXEMPTION

APPLICANT: Tony Blakely for Emanate Health

LOCATION: 1115 S. Sunset Avenue (Former Sunset Field Park)

WHEREAS, there was filed with the City, a verified application on the forms prescribed in Chapter 26, Article VI of the West Covina Municipal Code, requesting approval of a precise plan to:

develop the former Sunset Field Park site into a parking lot with 403-parking spaces

WHEREAS, the Planning Commission upon giving the required notice did on the 13th day of October 2020, conduct a duly advertised public hearing as prescribed by law to consider said application.

WHEREAS, studies and investigations made by this Commission and in its behalf reveal the following facts:

1. The applicant is requesting approval of a precise plan to develop the site from a vacant parcel to a 403-space parking lot intended to serve visitors, patients, and staff for Queen of the Valley Hospital. The project includes proposed surface parking, parking lot lights, landscaping, and an 8'-0" tall wall along the property line (adjacent to residential)
2. Appropriate findings for approval of a precise plan of design are as follows:
 - a. The proposed development plans and the uses proposed are consistent with the General Plan and any applicable specific plan.
 - b. The proposed development is consistent with adopted development standards for the zone and complies with all other applicable provision of the Municipal Code.

- c. Granting the permit would not be detrimental to the public interest, health, safety, and welfare and would not unreasonably interfere with the use or enjoyment of property in the vicinity of the subject property.
 - d. The site is physically suitable for the type, density and intensity of the development being proposed, including vehicle access and circulation, utilities, and the absence of physical constraints.
 - e. The architecture, site layout, location, shape, bulk and physical characteristics of the proposed development are compatible with the existing and future land uses, and do not interfere with orderly development in the vicinity.
3. The project is exempt from additional environmental review under Section 15182 (Projects Pursuant to a Specific Plan), pursuant to the requirements of the California Environmental Quality Act of 1970 (CEQA), because the project is consistent with standards and policies established by the City of West Queen of the Valley Specific Plan No. 1 (SP-1) and its adopted EIR. The City certified an EIR for Specific Plan No. 1 on November 6, 2019.

NOW, THEREFORE, the Planning Commission of the City of West Covina does resolve as follows:

1. On the basis of the evidence presented, both oral and documentary, the Planning Commission makes the following findings:
 - a. The project is a request for a Precise Plan to allow for the development of a surface parking lot accommodating 403 parking spaces. The project site is designated as "Commercial" in the City's General Plan and is zoned "Specific Plan" (SP-1). The proposed development is consistent with the General Plan land use designation and zoning for the site. The proposed project is consistent with the following General Plan policies:
 - Our Prosperous Community P2.4 Build on and grow West Covina's regional appeal
 - Our Prosperous Community P2.7a Explore health/medical campus opportunities
 - Our Prosperous Community P2.9 Support local businesses.
 - Our Well Planned Community P3.5 Support the growth of Queen of the Valley Hospital while developing a unifying vision and code for Sunset Avenue
 - b. The project involves the development of a surface parking lot with 403 parking stalls. The site is located within the Queen of the Valley Hospital Specific Plan (SP-1) area. As conditioned, the project will comply with all development standards within the Specific Plan, including incorporating a 10-foot wide landscaping buffer and 8-foot high wall adjacent to the neighboring

residential properties, and ensuring that the parking lot lighting will not spill onto the surrounding uses.

- c. The project site is adjacent to a two-story multifamily residential apartment complex to the northeast and single-family residential to the north across Walnut Creek Wash. The project is designed to be compatible with the uses within the vicinity and would not be detrimental to the public interest, health, safety, and general welfare and would not unreasonably interfere with the use and enjoyment of property.
 - d. The proposed development will expand the Queen of the Valley Hospital campus parking lot. The site is directly accessible from the campus parking lot area. The project is an infill development and is located within an urbanized area where utility connections are readily available.
 - e. All aspects of the site development are compatible with the existing and future land uses and do not interfere with orderly development in the vicinity. All site improvements and proposed landscaping will enhance the overall appearance of the site.
2. That pursuant to all of the evidence presented, both oral and documentary, and further based on the findings above, Precise Plan No. 20-05 is approved subject to the provisions of the West Covina Municipal Code, provided that the physical development of the herein described property shall conform to said plan and the conditions set forth herein which, except as otherwise expressly indicated, shall be fully performed and completed or shall be secured by bank or cash deposit satisfactory to the Community Development Director, before the use or occupancy of the property is commenced and before the Certificate of Occupancy is issued.
3. That the precise plan shall not be effective for any purpose until the applicant (or a duly authorized representative) has filed at the office of the Community Development Director, his affidavit stating he is aware of, and accepts, all conditions of this precise plan as set forth below. Additionally, no permits shall be issued until the applicant (or a duly authorized representative) pays all costs associated with the processing of this application pursuant to City Council Resolution No. 8690.
4. The costs and expenses of any enforcement activities, including, but not limited to attorneys' fees, caused by the applicant's violation of any condition imposed by this approval or any provision of the West Covina Municipal Code shall be paid by the applicant.
5. That the approval of the precise plan is subject to the following conditions:

PLANNING DIVISION

- a. Comply with plans reviewed by the Planning Commission on October 13, 2020.
- b. These conditions of approval shall be printed on or attached to the working drawings submitted to the Building Division for approval.
- c. That the project complies with all requirements of the Queen of the Valley Hospital Specific Plan (SP-1) and all other applicable standards of the West Covina Municipal Code.
- d. The approved use shall not create a public nuisance as defined under Section 15-200 of the West Covina Municipal Code.
- e. The approved use shall be in compliance with the Noise Ordinance (Chapter 15).
- f. This approval shall become null and void if the building permit is not obtained within two (2) years of the date of this approval.
- g. The applicant shall sign an affidavit accepting all conditions of this approval.
- h. That any proposed change to the approved plans be reviewed by the Planning Division, Engineering Division, Building Division, and Fire and Police Departments and that the written authorization of the Community Development Director shall be obtained prior to implementation.
- i. Graffiti-resistant coatings shall be used on all walls, fences, sign structures or similar structures to assist in deterring graffiti.
- j. Any graffiti that appears on the property during construction shall be cleaned or removed on the same business day.
- k. All outstanding fees will be due at the time of building permit issuance.
- l. This approval does not include approval of signs; a separate sign permit shall be obtained. All signs shall be required to comply with the City of West Covina Sign Code.
- m. All approved materials and colors shall be clearly indicated on the plans.
- n. All new ground-mounted, wall-mounted and/or roof-mounted equipment shall be screened from all views, in a manner that is architecturally compatible with the main building. Plans and elevations indicating the type of equipment and method of concealment shall be submitted to the Community Development Director for review and approval prior to the issuance of building permits.

- o. The location of new electrical transformers, vaults, antennas, mechanical and all other equipment not indicated on the approved plans must be approved by the Community Development Director prior to the issuance of building permit. Provide construction details prior to issuance of a building permit.
- p. An outdoor lighting plan showing electrolier types and locations, average illumination levels, points of minimum illumination and photometric data in conformance with Planning Commission Resolution No. 2513 and as requested shall be submitted to and approved by the Planning Division and the City Engineer.
- q. Parking light fixtures/poles closest to the north and east property lines shall be no taller than 20 feet in height as required by the Specific Plan. A revised photometric plan indicating that the light will not spill onto the surrounding uses shall be submitted to the Planning Division prior to building permit issuance.
- r. The parking lot shall comply with requirements of the Parking Lot Design and Lighting standards.
- s. The paved areas at the site shall be maintained clean and free of oil stains. All paved areas shall be pressure washed as needed to maintain the site in a clean and orderly manner.
- t. That prior to final building permit approval, a detailed landscape and irrigation plan in compliance with AB 1881 and executive order 13-29-15 shall be submitted for all planted areas to be affected by project. Plans shall include type, size and quantity of landscape materials and irrigation equipment. All vegetation areas shall be automatically irrigated and a detailed watering program and water budget shall be provided. All damaged vegetation shall be replaced and the site shall be kept free of diseased or dead plant materials and litter at all times. The landscape plan shall also include a combination of trees and shrubs to provide screening along the east property line adjacent to the multifamily residential property.
- u. Comply with all requirements of the "Art in Public Places" ordinance (WCMC Chapter 17), prior to the issuance of building permits. Artwork shall be installed or required fee paid prior to issuance of Certificate of Occupancy.
- v. All trees shall be indicated on the grading plan, including trees on, or near the property line on adjacent properties. The trees shall be marked as to whether they will be preserved or removed. Trees that are preserved should not be topped but should be pruned to preserve their natural form.
- w. The 8'-0" tall perimeter block wall shall be constructed of masonry, concrete or decorative block, such as slumpstone or split-face block. The wall shall be installed prior to building division permit final inspection of the parking lot.

- x. Any sidewalk, hardscape or parking facility, with potholes, broken, raised or depressed sections, large cracks, mud and/or dust, accumulation of loose material, faded or illegible pavement striping or other deterioration shall be repaired.
- y. Prior to requesting a final inspection, the Planning Division shall inspect the development.
- z. All new utilities shall be placed underground prior to issuance of Certificate of Occupancy per WCMC 23-273.
- aa. The applicant shall execute an indemnity agreement, in a form provided by the City and approved by the City Attorney, indemnifying the City against any and all actions brought against the City in connection with the approvals set forth herein.
- bb. All approved materials and colors shall be clearly indicated on the plans.
- cc. The Zoning Code gives provisions for up to two one-year extensions to keep entitlements active. Therefore, prior to final approval, (if building permits have not been obtained) you are urged to file a letter with the department requesting a one-year extension of time. The required submittal is a letter stating the reasons why an extension is needed, as well as an applicable processing fee. Please be advised that the applicant will not be notified by the Planning Division about the pending expiration of the subject entitlement.
- dd. During construction, the delivery of materials and equipment, outdoor operations of equipment, and construction activity shall be limited to the hours between 9:00 a.m. and 1:00 p.m., and between 4:00 p.m. and 8:00 p.m. (Monday through Friday) and 7:00 a.m. and 8:00 p.m. (Saturdays).
- ee. Comply with all applicable mitigation measures listed in the Queen of the Valley Specific Plan Mitigation Monitoring and Reporting Program Final Program Environmental Impact Report (State Clearinghouse Number 2018101068).
- ff. Engineering Division Requirements:
 - 1. Project shall be reviewed and approved by the City Traffic Engineer, prior to the issuance of permits. Any mitigation measures shown on the traffic study if any shall be made at the sole cost to the property owner/developer.
 - 2. Prior final of the building permit(s), inspection required by Public Works inspector.
 - 3. Prepare a hydrology/hydraulic study of existing and proposed development per the Los Angeles County Hydrology Manual.

4. The required street improvements shall include those portions of roadways contiguous to the subject property and include:
5. Existing driveway approaches shall be removed and reconstructed to meet current ADA requirements.
6. Repair all damaged and off-grade curbs, gutters and sidewalks.
7. The developer shall either pay an in-lieu fee equal to the estimated cost of street rehabilitation based on Los Angeles County Land Development Division Bond Calculation Sheets prior to the issuance of building permits or provide street rehabilitation work up to centerline of all streets contiguous to subject property.
8. Parking lot and driveway improvements on private property for this use shall comply with Planning Commission Resolution No. 2513 and be constructed to the City of West Covina Standards.
9. An itemized cost estimate based on Los Angeles County Land Development Division Bond Calculation Sheets for all on-site and off-site improvements to be constructed (except buildings) shall be submitted to the Engineering Division for approval. Based upon the approved cost estimates, required fees shall be paid and improvement securities for all on-site and off-site improvements (except buildings) and 100% labor/material securities for all off-site improvements, shall be posted prior to final approval of the plans.
10. A soils erosion and sediment control plan shall be submitted to and approved by the Planning Department and Engineering Division
11. A grading and drainage plan shall be approved prior to issuance of the building permit. The grading and drainage plan shall indicate how all storm drainage including contributory drainage from adjacent lots is carried to the public way or drainage structure approved to receive storm water.
12. Stormwater Planning Program LID Plan Checklist (Form PC) completed by Engineer of Record shall be copied on the first sheet of Grading Plans. The form can be found at the following link
<https://www.westcovina.org/home/showdocument?id=18427>
13. Comply with all regulations of the Los Angeles Regional Water Quality Control Board and Article II of Chapter 9 of the West Covina Municipal Code concerning Stormwater/Urban Run-off Pollution control.
14. Underground all utility services to the property.

15. Project shall be reviewed and approved by the City Traffic Engineer, prior to the issuance of permits.

16. Traffic Engineer Requirements:

- i. The following items need to be submitted to Traffic Engineering for approval prior to permits being issued:
 - A Traffic flow plan to and from the proposed parking lot needs to be submitted to Traffic Engineering.
 - Since the proposed parking lot is part of the overall parking for the hospital, dimensions of aisle widths between the proposed parking lot and existing parking spaces needs to show on the plans the tie in of how the existing lots will be reconfigured to accommodate new egress and ingress to proposed lot. (show aisle widths and parking spaces in existing lots opposite new driveways to proposed lot)
 - A Pedestrian Travel Plan also needs to be submitted showing the pedestrian paths of travel from the lot to the medical office buildings.

gg. Building Division Requirements:

1. All Conditions of Approval as approved by the Planning Commission shall appear as notes on the plans submitted for building plan check and permits.
2. Design shall comply with the 2020 County of Los Angeles Building Codes and 2019 California Energy and Green Building Standards Codes. Plans shall be submitted for plan check and required permits shall be obtained from the Building & Safety Division prior to start of construction.
3. Separate application(s), plan check(s), and permit(s) is/are required for:
 - a) Lighting standards and light fixtures
 - b) Grading (see Engineering Division for requirements)
 - c) Demolition work
 - d) Retaining walls (see Engineering Division for requirements)
 - e) Required masonry or concrete perimeter walls or trash enclosures
 - f) Signs
 - g) Electrical
4. All new on-site utility service lines shall be placed underground. All relocated on-site utility service lines shall be underground when the cost or square footage of an addition or alteration exceeds 50% of the existing value or area.
5. Applicant shall submit a plan identifying total parking spaces available and proximity of parking to an accessible path of travel to the various buildings, facilities and/or uses available for employee, patient, and visitor entrances on

site. All accessible spaces shall be identified and distributed proportionately within proximity of the associated building entrances. State of California Accessibility regulations requires accessible parking spaces based on number of parking spaces available and is required to be calculated separately for each parking facility (or lot), and not based on the total number of parking spaces available on the site.

6. Ten percent of patient and visitor parking spaces provided to serve hospital outpatient facilities, and free-standing buildings providing outpatient clinical services of a hospital shall be accessible parking.
7. Site shall be provided with an accessible path of travel connecting the building entrances from the public sidewalk, accessible parking, and other buildings or essential facilities located on the site.
8. All work shall be completed with a valid permit and in accordance with applicable Building Regulations.

hh. Fire Department Requirements:

1. *Additional Fire Department Requirements May be Set upon future review of a full set of architectural plans.*

ii. Police Department Requirements:

1. CCTV System Requirements:

- a) 720p (1280x720) minimum recording resolution is required. Increased resolution of 1080p (1920x1080) or better is encouraged
- b) Minimum H.264 video compression, H.265 is also acceptable
- c) Real-time recording 30 fps per camera @ 720p resolution
- d) Use caution when purchasing systems, and insure that each camera will be recording at full resolution and frame rate at the minimum spec, whether it's 720p, 1080p, or better. Recording devices often have limitations and will sometimes be advertised as supporting 720p or 1080p, however the advertising doesn't explain that the higher resolution is only for limited channels, and when maxed out will provide reduced resolution
- e) Minimum 30 day storage retention and archival for each camera (all video) at 720p resolution, 30fps (full frame rate and resolution)

- f) Design your camera system to insure that the privacy of your patrons is not infringed, and do not view or record areas where your patron(s) would have an expectation of privacy. Typically this is easily resolved by the placement of the camera, and is not an issue. However where this could present a problem as the need for both coverage and privacy exists in the same area, camera technology exists that allows for the best of both worlds. Called 'video masking', 'window blanking', and by other names, it allows the area within a larger view to be masked so that private areas cannot be seen, however surrounding areas are still viewable.
- g) The recording device must contain a USB port for police department personnel to easily access system and download video
- h) Video should be exportable in an open file format.
- i) The cameras shall capture, at minimum, the parking lot.

I HEREBY CERTIFY, that the foregoing Resolution was adopted by the Planning Commission of the City of West Covina, at a regular meeting held on the 13th day of October, 2020, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

DATE: October 13, 2020

Sheena Heng, Chairperson
Planning Commission

Mark Persico, Secretary
Planning Commission

California Environmental Quality Act Consistency Evaluation Memorandum

Sunset Field Surface Parking Lot

Prepared for | Emanate Health
140 West College Street
Covina, California 91722

Prepared by | Psomas
5 Hutton Centre Drive, Suite 300
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August 2020

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ATTACHMENTS

Attachment

- A Air Quality and Greenhouse Gas Data

1.0 PURPOSE AND BACKGROUND

1.1 PURPOSE

The proposed Sunset Field Surface Parking Lot Project (Project or Proposed Project) is implementing a surface parking lot on the former Sunset Field provided for in the approved Queen of the Valley Hospital Specific Plan (QVHSP—Approved Project) for which a Program Environmental Impact Report (PEIR) has been prepared. The purpose of this California Environmental Quality Act (CEQA) Consistency Evaluation Memorandum (CEQA Memorandum) is to assess the adequacy of the PEIR, prepared in compliance with CEQA for the Approved Project. Since the plans for the Approved Project were developed and the associated environmental document was certified, no modifications to the surface parking lot component of the Approved Project have been made. This consistency evaluation assesses whether the PEIR adequately addressed the potential environmental impacts associated with the Proposed Project; if substantial changes are proposed in the Project; if substantial changes have occurred in the circumstances; or if new information is available that was not known before, which would require major revisions of the PEIR for the Approved Project. The analysis in Section 3.0, Consistency Evaluation assesses and provides justifications for lack of no significant impact emanating from implementation of the Proposed Project.

1.2 BACKGROUND

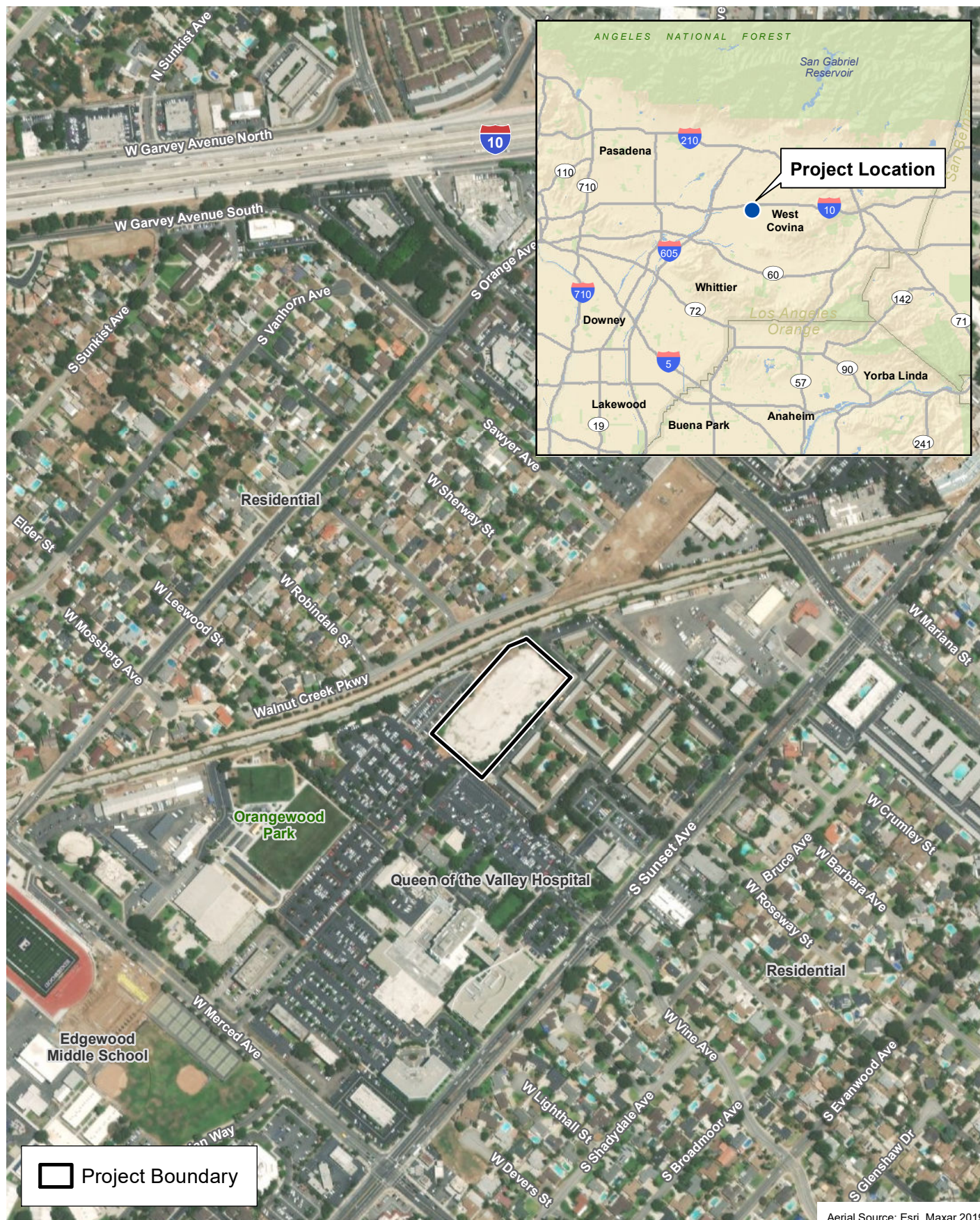
1.2.1 APPROVED PROJECT

As part of the CEQA process, a Final PEIR (Certified Final PEIR) for the Queen of the Valley Hospital Specific Plan (Approved Project) (State Clearinghouse Number 2018101068) was prepared. The Final PEIR was certified by the City of West Covina City Council on November 6, 2019.

The purpose of the Approved Project is expansion of the existing Queen of the Valley Hospital (QVH or Hospital) over the next ten+ years with the use of a Specific Plan and Program EIR, as shown in Exhibit 1, Regional Location and Local Vicinity. The Proposed Project would increase patient and support services, add several new buildings, renovate and demolish a number of existing buildings onsite. One or two stand-alone parking structures may also be included in the master planned changes to the site. The Specific Plan would govern the future development of the entire hospital campus. The phased expansion would include the following:

- Initially four existing buildings (Marian Rooms A and B and Buildings A-C) would be demolished to accommodate new buildings. This initial work would also involve adding surface parking on the former City-owned 2.8-acre Sunset Field property adjacent and to the north of the QVH grounds.
- The first phase (1A) of new construction would involve expansion and new construction of the emergency room and intensive care unit for a total of 66,000 square feet. Phase 1B would entail construction of a new medical office building and ambulatory surgery center and a new multi-story parking structure. Improve all-weather access to the Arcadia Wilderness Park by constructing a new culvert crossing.
- Phase 2 construction would include a new 5-6 story medical tower with 132,000 square feet of new building space.

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Aerial Source: Esri, Maxar 2019

Regional Location and Local Vicinity

Sunset Field Surface Parking Lot

Exhibit 1



500 250 0 500
Feet

PSOMAS

(Rev: 08/07/2020 MMD) R:\Projects\EMA\3EMA010100\Graphics\Surface_Parking\exRL_LV.pdf

- The final phase of long-range improvements would involve consolidation of the two medical towers, a new medical office building with 90,000 square feet of space, a second multi-story parking structure, and a new hospital building with 132,000 square feet.

Mitigation Measures of the Certified Final PEIR

The analysis in Section 4.0 of the Certified Final PEIR evaluated the impacts associated with the Approved Project implementation. The Mitigation Measures (MMs) associated with the Approved Project are included under each topical section of this document (i.e., Sections 3.1 through 3.19), as applicable. The Approved Project resulted in less than significant impacts on Noise and Population and Housing and less than significant impacts with implementation of the MMs on Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas (GHG) Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems.

The MMs were verified as part of the Mitigation Monitoring and Reporting Program (MMRP) and will be implemented to the satisfaction of the City of West Covina and would also apply to the Precise Plan for Surface Parking Project, as deemed necessary.

2.0 SUNSET FIELD SURFACE PARKING LOT

2.1 PROJECT LOCATION AND SETTING

The Queen of the Valley Hospital (QVH or Hospital) occupies approximately 28.8 acres and is located at 1115-1135 South Sunset Avenue in the City of West Covina. The property is at the north corner of South Sunset Avenue and West Merced Avenue approximately a half mile south of the Interstate (I)-10 Freeway in the east-central portion of the San Gabriel Valley.

The QVH is in the eastern San Gabriel Valley, which is part of the larger Los Angeles Basin and also within the South Coast Air Basin (SoCAB). The Walnut Creek Flood Control Channel is just north of the hospital, which is under the jurisdiction of various federal, State, and county agencies. The site is essentially flat and fully developed with buildings, parking lots, landscaping, and related improvements and contains no native vegetation or undisturbed land. Surrounding land uses include residential to the northeast and north across the flood control channel, community park facilities to the west, two schools to the south across Merced Avenue, and commercial uses to the southeast and east across Sunset Avenue.

The Proposed Project site is 2.8 acres of the former Sunset Field property in the north corner of the QVH. Exhibit 1, depicts Regional Location and Local Vicinity. The QVH site is fully developed and contains no native vegetation or habitat. The Proposed Project site is disturbed and undeveloped and contains turf and trees around the perimeter of the site. However, onsite vegetation is either introduced or weedy species that provide minimal habitat for native animals except for songbirds and small mammals tolerant of human activity (e.g. ground squirrels).

2.2 PROJECT DESCRIPTION

At the time the PEIR was prepared, the QVH was in negotiation with the City to acquire the 2.8-acre Sunset Field at the northeast corner of the QVH property to provide additional surface parking until new parking structures can be built. An agreement has been reached, and the proposed parking lot property is currently under the ownership of the QVH.

No substantial changes to the Approved Project activities are proposed compared to what was analyzed in the Certified Final PEIR, as part of the Approved Project. The total Project area for the proposed parking lot is 146,490 square feet (sf), of which 129,510 sf or 88 percent would be impervious and 16,980 sf or 12 percent would be landscaped. The Proposed Project would add a total of 403 parking stalls to QVH campus. The 403 stalls would include 265 standard, 100 or 25 percent compact, and 38 or 9 percent electric vehicle charging stalls. Please refer to Exhibit 2, Site Plan, for details. Additionally, a total of 19 existing stalls would be removed as part of the Project. With the removal of 19 stalls and addition of 403 stalls, the QVH campus would have a total of 1,818 stalls.

2.2.1 LANDSCAPE PLAN

There are a total of 25 existing trees within the parking lot limits of work, which would be removed to accommodate construction of the Project and a required 8-foot tall screen wall around the site. However, the Project is required to provide one tree per 10 parking stalls (41 trees), and 8 percent landscaping (11,719 sf). The Proposed Project exceeds the requirements by providing 16,980 sf of landscaped area.

	SD	STORM DRAIN LINE (<18")
	SD	STORM DRAIN LINE (≥ 18")
	FW	FIRE WATER LINE
	SS	SANITARY SEWER LINE
	W	WATER LINE
	E	ELECTRICAL LINE
	T	TELEPHONE LINE
	G	GAS LINE
	X	CHAIN LINK FENCE
		EXISTING BUILDING FOOTPRINT
		CROSS-GUTTER
		PROPERTY LINE
		WALNUT CREEK PARKWAY
		FLOW DIRECTION
		BASEBALL FIELD LIGHT POLE AND FIXTURE
		LIGHT POLE AND FIXTURE
		SIGN
	MH	MANHOLE

TOTAL PROJECT AREA	146,490 SF
PROPOSED IMPERVIOUS AREA	129,510 SF (88%)
PROPOSED LANDSCAPE AREA	16,980 SF (12%)

EXISTING ENTIRE CAMPUS:	1,434 STALLS
TOTAL PROPOSED NEW:	403 STALLS
PROPOSED STANDARD:	265 STALLS
PROPOSED COMPACT:	100 STALLS (25%)
PROPOSED EV CHARGING:	38 STALLS (9%)
EXISTING TO BE REMOVED:	19 STALLS
NEW CAMPUS TOTAL:	1,818 STALLS



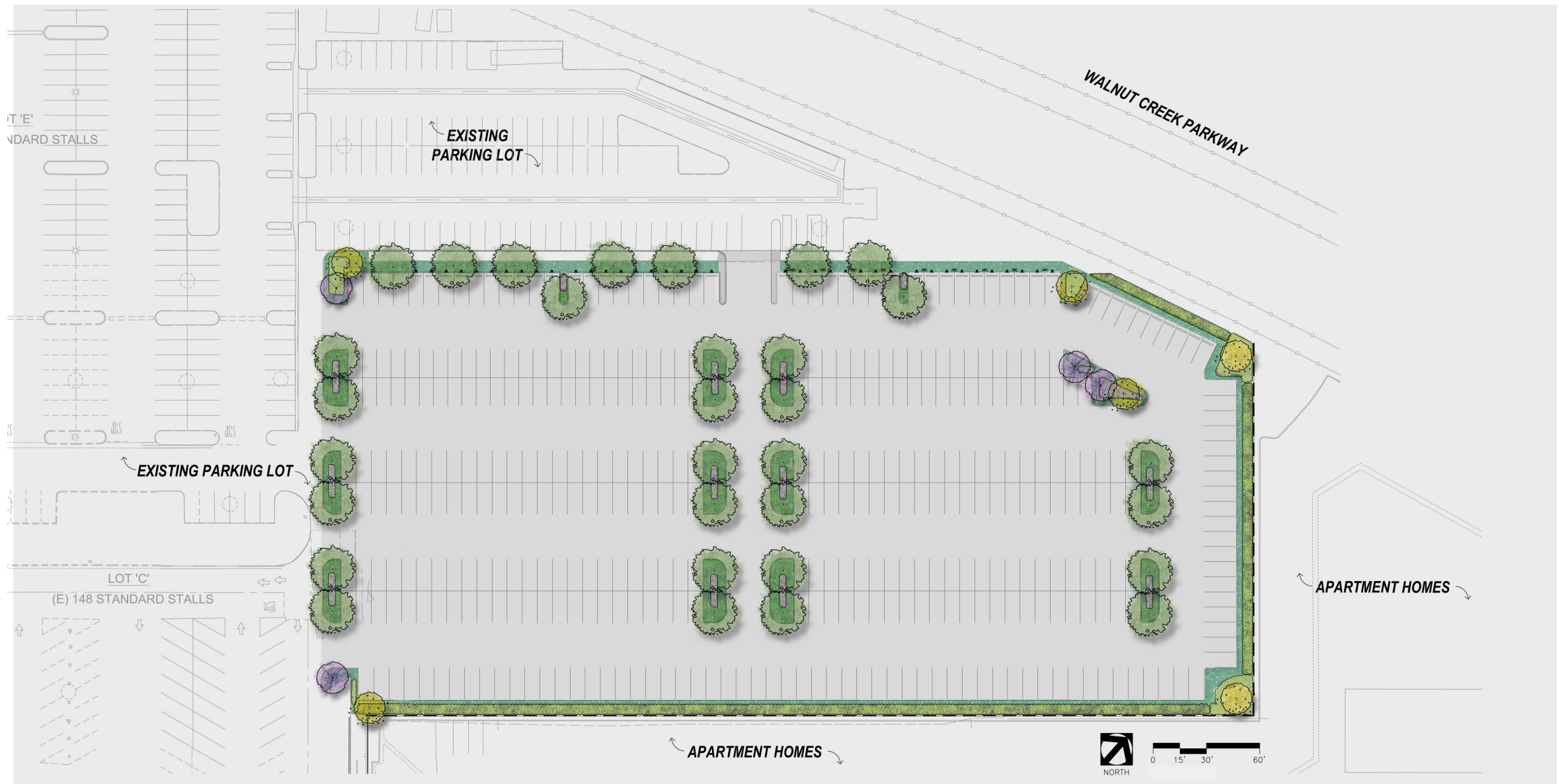
As shown on Exhibit 3a and 3b, Landscape Concept Plan, the proposed landscaping for the site would be installed around the perimeter of the site and within parking islands. The Landscape Concept Plan provides for a hierarchy of landscaping, which would include trees, medium shrub/hedge, small shrub, and ground cover. The specific options for the trees/plants are shown on Exhibit 3b. The trees are proposed along the western and southwestern boundaries of the parking lot in addition to the parking islands within the parking area; the shrubs and hedge are proposed to be installed primarily around the perimeter of the parking lot along northern, eastern, and southeastern boundaries; and the ground cover would be installed around the perimeter.

The proposed parking lot would also include parking lot lighting, which would be installed around the perimeter of the lot and the proposed parking islands. For details, please refer to Exhibit 4, Lighting Plan.

2.2.2 CONSTRUCTION

The proposed Project site has been graded, but minimal additional grading may be required, consisting of recompact existing dirt. It is anticipated that cut and fill would balance onsite. Construction of the Project would generate temporary trips associated with construction activities, which would occur in 2020 and last for two months. Construction-related traffic would primarily be associated with delivery of building materials and construction equipment, removal of construction debris, and construction workers commuting to/from the Project site.

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PLANTING LEGEND

TREE OPTIONS:		SIZE	WATER
	CERCIS OCCIDENTALIS WESTERN REDBUD	15 GAL- 24" BOX	LOW
	CERCIDIUM X 'DESERT MUSEUM' DESERT MUSEUM PALO VERDE	15 GAL- 24" BOX	LOW
	ARBUTUS UNEDO STRAWBERRY TREE	24" BOX	LOW
	SEARIS (RHUS) LANCEA AFRICAN SUMAC	24" BOX	LOW

MEDIUM SHRUB / HEDGE OPTIONS:		SIZE	SPACING	WATER
	HETEROMELES ARBUTIFOLIA TOYON	5 GAL	54"- 60" O.C.	LOW
	RHUS OVATA SUGAR BUSH	5 GAL	54"- 60" O.C.	LOW
	RUELLIA PENINSULARI BAJA RUELLIA	5 GAL	54"- 60" O.C.	LOW
	SALVIA C. WINEFRED GILMAN' WINEFRED GILMAN SAGE	5 GAL	54"- 60" O.C.	LOW

SMALL SHRUB:		SIZE	SPACING	WATER
	ARCTOSTAPHYLOS 'JOHN DOURLEY' JOHN DOURLEY MANZANITA	5 GAL	36"-48" O.C.	LOW
	GAURA LINDHEIMERI WHITE GAURA	5 GAL	36"-48" O.C.	LOW
	HESPERALOE PARVIFLORA RED YUCCA	5 GAL	36"-48" O.C.	LOW
	LEUCODENDRON 'SAFARI SUNSET' SAFARI CONEBUSH	5 GAL	48"-60" O.C.	LOW
GROUND COVER:		SIZE	SPACING	WATER
	MYOPORUM P. 'PINK' PINK AUSTRALIAN RACER	1 GAL	30"-36" O.C.	LOW
	SENECIO MANDRALISCAE BLUE CHALK STICKS	1 GAL	30"-36" O.C.	LOW

TREE SUMMARY

(REQUIRED 1 TREE PER 10 PARKING STALLS = 41 TREES REQUIRED)
NUMBER OF PARKING STALLS: 403
NUMBER OF TREES: 41

LANDSCAPE AREA TOTAL

(8% REQUIRED LANDSCAPE SQUARE FOOTAGE = 11,719 SQUARE FEET REQUIRED)
PROJECT AREA: 146,480 SQUARE FEET
LANDSCAPE AREA PROVIDED = 16,980 SQUARE FEET (11%)

Source: Lynn Capouya Inc. Landscape Architects, July 2020

Landscape Concept Plan

Sunset Field Surface Parking Lot

Exhibit 3a



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TREES



SEARSIA (RHUS) LANCEA, AFRICAN SUMAC



CERCIS OCCIDENTALIS, WESTERN REDBUD



CERCIDIUM 'DESERT MUSEUM', MUSEUM PALO VERDE



ARBUTUS UNEDO, STRAWBERRY TREE

SHRUBS



SALVIA C. WINEFRED GILMAN', WINEFRED GILMAN SAGE



GAURA LINDHEIMERI, WHITE GAURA



LEUCODENDRON 'SAFARI SUNSET', SAFARI CONEBUSH



RHUS OVATA, SUGAR BUSH



ARCTOSTAPHYLOS 'JOHN DOURLEY', MANZANITA



HESPERALOE PARVIFLORA, RED YUCCA



UELLIA PENINSULARIS, BAJA RUELLIA

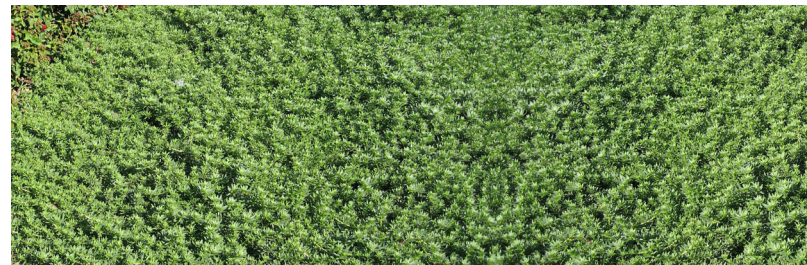


HETEROMELES ARBUTIFOLIA, TOYON

GROUND COVER



SENECIO MANDRALISCAE, BLUE CHALK STICKS



MYOPORUM P. 'PINK', PINK AUSTRALIAN RACER

Source: Lynn Capouya Inc. Landscape Architects, July 2020

Landscape Concept Plan

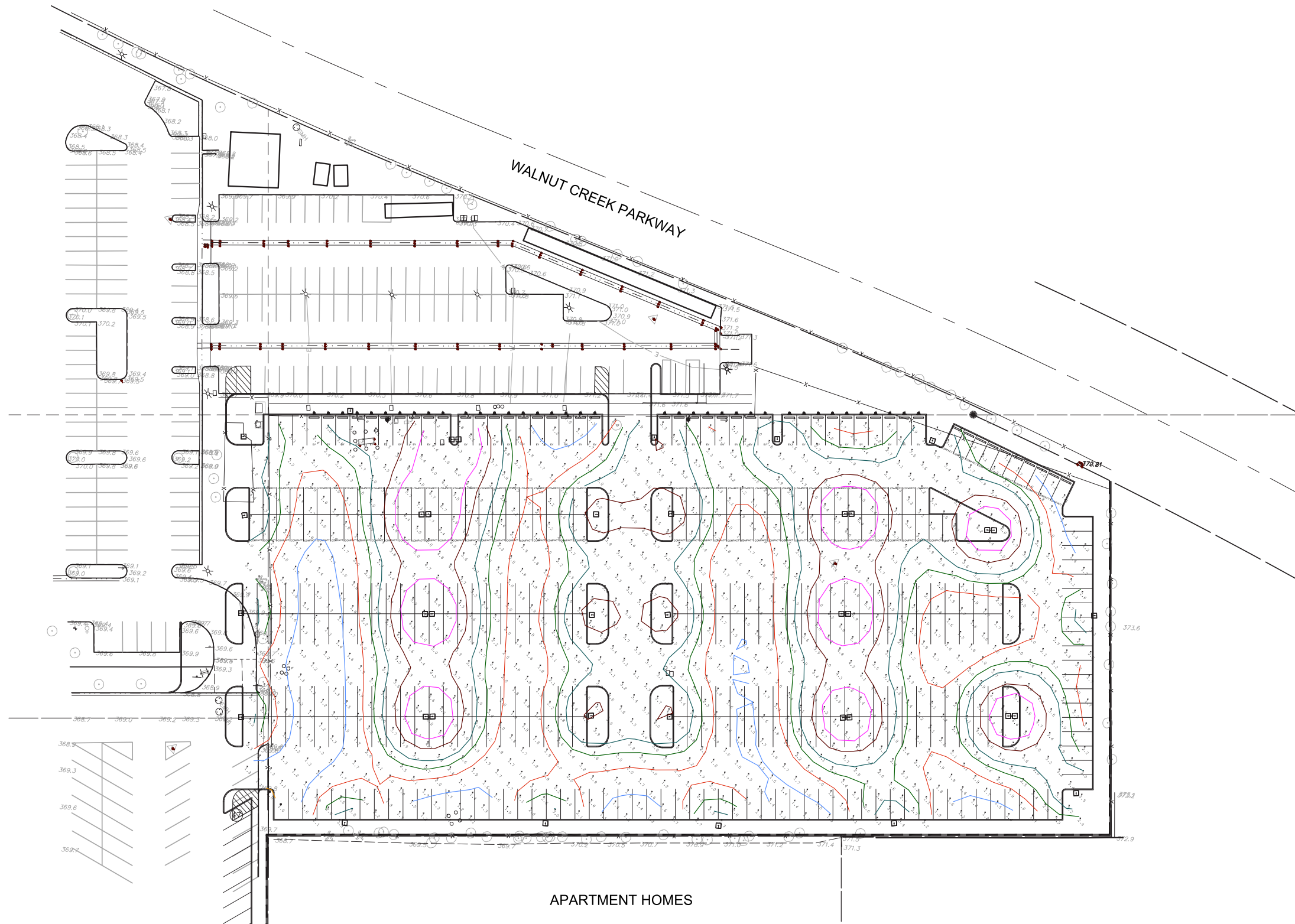
Sunset Field Surface Parking Lot

Exhibit 3b



(08/07/2020 MMD) R:\Projects\EMA\3EMA010100\Graphics\Surface_Parking\ex_LandscapePlan.pdf

D:\Projects\SEMA010100\Graphics\Surface_Parkinglex_LightingPlan_20200806.ai



Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
Parking Lot	Illuminance	Fc	2.87	7.7	1.0	2.87	7.70

Luminaire Schedule						
Symbol	Qty	Label	Arrangement	Total Lamp Lumens	LLF	Description
	9	NTA-A-NM-T5-11L-40K-UL-BZ_CON	BACK-BACK	N.A.	1.000	
	20	NTA-A-NM-T5-11L-40K-UL-BZ_CON	SINGLE	N.A.	1.000	



CREE NOCTURA SERIES:
 11,000 LUMENS
 75 W
 HEIGHT: 25'

COLOR CODES:

- MAXIMUM POINT
- MINIMUM POINT
- 0.5 FC CONTOUR
- 1.0 FC CONTOUR
- 1.5 FC CONTOUR
- 2.0 FC CONTOUR
- 2.5 FC CONTOUR
- 3.0 FC CONTOUR
- 4.0 FC CONTOUR
- 5.0 FC CONTOUR

Source: Psomas, August 2020

Lighting Plan

Sunset Field Surface Parking Lot

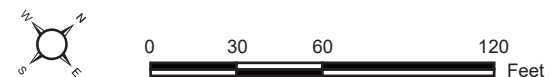


Exhibit 4



(08/07/2020 MMD) R:\Projects\EMA\3EMA010100\Graphics\Surface_Parkinglex_LightingPlan.pdf

3.0 CONSISTENCY EVALUATION

This CEQA Consistency Evaluation Memorandum (CEQA Memorandum) compares the Proposed Project to the Approved Project as analyzed in the Certified Final PEIR. This evaluation addresses each of the topical areas on the CEQA environmental checklist, as updated in December 2018. The analyses below substantiate that the Proposed Project would not result in any new significant environmental impacts, nor would it create substantially greater impacts than what were previously addressed in the Certified Final PEIR.

3.1 AESTHETICS

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project's impacts related to scenic vistas would be less than significant, as the Approved Project would not obstruct northern views of the San Gabriel Mountains or southern views of the Puente Hills along Sunset Avenue. Additionally, it was determined that implementation of the Approved Project would not damage scenic resources within a State scenic highway, as none exists in the vicinity of the QVH. Furthermore, it was indicated that the Approved Project would be compatible with the surrounding uses and not visually intrusive. Development in compliance with the development standards and design guidelines of the Specific Plan would create a visually cohesive community that would not substantially degrade the existing visual character or quality of the site and its surroundings. Lastly, it was determined that even though new sources of light and glare would be introduced, adherence to the development standards and design guidelines in the Specific Plan would ensure that potential impacts related to light and glare would be less than significant.

Mitigation Measures

- AES-1** Construction staging areas shall be located as far as practical from residential neighborhoods immediately adjacent to the Project site, and perimeter fencing shall be installed to obstruct views from adjacent ground level vantage points into the Project site during construction. Implementation of this measure shall be verified by the City during construction. **(Applicable)**
- AES-2** The development of the QVHSP limits new parking structures to 60 feet in height. Buildings would be subject to a six-story height limit in Zones 1 and 2. Zone 3 would reduce the height limit of 30 feet for parking structures and three stories for buildings. Compliance with the established height limits shall be confirmed by the City in accordance with implementation provisions outlined in Chapter 6 of the Queen of the Valley Specific Plan prior to the issuance of any building permits. **(Not Applicable)**
- AES-3** Prior to approval of any building plans for structures over 45 feet or 3 stories in height that are within 100 feet of the Orangewood Park soccer fields, a detailed shade and shadow analysis shall be conducted to accurately inform the City and park users as to any anticipated encroachment (i.e., shade or shadow) on the park fields upon completion of the involved structure(s). The hospital shall also plan for any structures in this location to be at the minimum height necessary to minimize shade and shadow impacts on City park facilities to the extent practical. This measure shall be

implemented to the satisfaction of the City Community Development Director. (**Not Applicable**)

- AES-4** Temporary nighttime lighting installed during construction for security or any other purpose shall be downward-facing and hooded or shielded to prevent light from spilling outside the staging area and from directly broadcasting security light into the sky or onto adjacent residential properties. Compliance with this measure shall be verified by the City's Building and Safety Services Department during inspections of the construction site. (**Applicable**)

Impact Analysis

Would the project:

a) Have a substantial adverse effect on a scenic vista?

No Substantial Change from Previous Analysis. As indicated in the Certified Final PEIR, the West Covina General Plan does not identify any designated scenic vistas; nevertheless, the Los Angeles National Forest and San Gabriel Mountains are visible in the background throughout West Covina. However, due to its nature, being a surface parking lot, the Project would not create any obstructions to the northern views of the San Gabriel Mountains or southern views of the Puente Hills along Sunset Avenue during construction or operation, and impacts related to scenic vistas would be less than significant, consistent with the findings in the Certified Final PEIR. No new impacts pertaining to scenic vistas that were not previously analyzed in the Certified Final PEIR would result, and no mitigation is required.

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

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Project site is not located within or near a State scenic highway that would include scenic resources, including trees, rock outcroppings, and historic buildings. The nearest Officially Designated and Eligible State Scenic Highways are located approximately 20 miles north and over 2.5 miles south of the Project site, respectively (City of West Covina 2019). Views of the Project site from the portion of SR-57, which is an Eligible State Scenic Highway, are completely obstructed by intervening topography and structures, and there is no direct line-of-sight to the Project area such that short-term construction and long-term operational activities would affect public views from SR-57. Therefore, implementation of the Proposed Project would not result in a new impact pertaining to scenic resources within a State scenic highway that was not previously discussed and analyzed in the Certified Final PEIR, and no new mitigation is required.

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?

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would be compatible with the surrounding uses and not visually intrusive. More specifically, similar surface parking lots exist to the southwest of the Proposed Project. Views of the Project site would be available from Walnut Creek Parkway to the north and northwest; West Cameron Avenue to the northeast; and Orangewood Park to the west. In addition, a residential

community called Torrey Pines Apartments (Apartments) is located adjacent, to the east and southeast of the site.

Walnut Creek Parkway less than 0.04 mile from the Project, is located across from the Walnut Creek Wash, which is lined with vegetation, mature trees, and fencing on both sides. The vegetation and mature trees would screen the views of the Project site during construction and operation for motorists driving on Walnut Creek Parkway.

West Cameron Avenue is approximately 0.2 mile to the northeast of the Project site. While motorists may have glimpses of the Project site during construction and operation of the Project, the existing trees to the north of the site in addition to trees and vegetation along the Walnut Creek Wash would help obstruct direct views of the site. In addition, existing intervening residential and industrial structures would further obstruct views of the Project site.

Orangewood Park is located less than 0.1 mile to the west of the Project site across an existing surface parking. The existing public views from Orangewood Park are of the surface parking lot located between the park and the Project site. Given the adjacency of the existing surface lot with the Proposed Project site, the surface parking on the Project site would appear as an extension of the same viewshed to the viewers from the park. In addition, the existing surface parking lot has ornamental trees scattered within the lot and a row of trees along the northeast side of the park, thereby blocking the Proposed Project from the park users.

The apartment development located immediately to the east and northeast of the Project site is considered a sensitive land use in terms of visual quality or change in an existing viewshed. Even though private views are not protected under the above threshold, the apartment development has community walkways, common areas, and surface parking that could be considered vantage points to the Proposed Project site. However, the apartments are buffered from Project site by ornamental trees located on the west and southwest and a carport bordering the northwest of the apartment complex. During construction, staging areas would be located as far as possible from residential uses and fenced (MM AES-1) to minimize potential temporary construction impacts to the apartment residents. During operation, the Proposed Project would provide similar views as the existing surface parking lots immediately to the south, southwest, and west of the apartments to the residents of the apartment complex. In fact, the proposed surface parking would be compatible with the existing parking lots and a continuation of the same viewshed. Furthermore, The Project would not include structures that would obstruct views of the surroundings to the residents.

Overall, views into the Project site, during construction and operation, from public vantage points would not result in a new significant impact nor increase the severity of the previously identified impacts for which new MMs would be required.

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

No Substantial Change from Previous Analysis. As discussed in the Certified Final PEIR, the QVH campus as a whole is subject to nighttime lighting from a variety of sources such as security lighting from the existing buildings and parking lots and adjacent lighting from existing residential, commercial, and office uses in addition to street lighting. However, the Project site is currently undeveloped with no source of lighting. The Proposed Project would introduce new lighting sources associated with construction and operation of the proposed surface parking lot. The new source of lighting could potentially impact the existing apartments, immediately northeast of the Proposed Project, as residential uses are considered sensitive land uses in terms of lighting.

However, as discussed in the Certified Final PEIR, compliance with City's hours of construction and locating construction staging areas as far as possible from adjacent residential uses (MM AES-1) would minimize light intrusion. Additionally, temporary lighting installed for security will be downward facing and shielded to prevent lighting from spillover outside the staging area (MM AES-4). In terms of operation, while a new source of lighting would be introduced, the Project is located in an area that is already subject to nighttime lighting from the existing uses on campus and offsite adjacent uses. Adherence to the lighting design requirements in the City Municipal Code and Specific Plan would be enforced through the City's development review and permit process and would ensure that on-site development does not significantly affect adjacent uses in terms of light spillover.

Regarding glare, the Project is a surface parking lot and is not anticipated to create sources of glare that would potentially create hazards to motorists and nuisance for pedestrians and other viewers. The parking lot would not include structures with surfaces that would create glare. No impacts pertaining to glare would result.

Therefore, , the Proposed Project would not introduce a new significant impact pertaining to light and glare beyond what was analyzed in the Certified Final PEIR that would require new mitigation. The potential impacts would be the same, and no new mitigation is required.

3.2 AGRICULTURAL AND FORESTRY RESOURCES

This topic was focused out from analysis in the PEIR, as per the Farmland Mapping and Monitoring Program (FMMP), managed by the State Department of Conservation (CDC 2018), the entire City, including the QVH campus, is classified as “Urban and Built-Up Land”, which contains no agricultural resources. Similarly, the Fire and Resource Assessment Program (FRAP), maintained by the California Department of Forestry and Fire Protection (CDFFP), indicates that the entire City, including the QVH campus, does not contain any forest or forest-related resources.

Additionally, the Proposed Project site is currently disturbed and undeveloped with some ornamental trees. The site contains no agricultural or forest resources, so there is no potential for any significant impacts from the Proposed Project relative to agricultural or forest resources. Therefore, these issues will not be further evaluated in this CEQA Memorandum.

3.3 AIR QUALITY

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project would be consistent with the South Coast Air Quality Management District's (SCAQMD's) Air Quality Management Plan, because the Approved Project would have construction and operational phase emissions that were below the SCAQMD's regional emissions threshold with implementation of MMs AIR-1 through AIR-3. Additionally, it was determined that the Approved Project would not conflict with or exceed the assumptions in the AQMP because although the Approved Project required a General Plan Amendment and Zone Change, the trip and energy use would likely be reduced with implementation of the Approved Project, resulting in lower air quality emissions. The Certified Final PEIR determined that regional and local construction emissions would be less than significant with the incorporation of MMs AIR-1 and AIR-2. Long-term operational regional emissions of O₃ precursors (VOC and NO_x), CO, PM₁₀, and PM_{2.5} would be less than established thresholds and therefore impacts would be less than significant. Similarly, cumulative air quality impacts would be less than significant. With implementation of MM AIR-3, the Approved Project was determined to have less than significant impacts for (1) off-site CO hotspots, (2) exposure of persons to construction and operational phase criteria pollutants, and (3) exposure of persons during construction or operation to toxic air contaminants. Objectionable odors for the Approved Project were deemed less than significant.

Mitigation Measures

- AIR-1** During construction of the Long Range Improvements Phase of the Project, the Hospital shall use paints that have a volatile organic compound (VOC) content of 10 grams/Liter (g/L) or less for all architectural coating activities. **(Not Applicable)**
- AIR-2** During all construction phases of the Project, all off-road diesel-powered construction equipment that is greater than or equal to 50 horsepower shall be required to meet or exceed U.S. Environmental Protection Agency (USEPA) Tier 3 emission standards. **(Applicable)**
- AIR-3** Prior to the start of any construction activities, proposed building plans shall demonstrate that any standby emergency generator proposed as part of that phase shall be powered by natural gas. This measure shall be implemented to the satisfaction of the City Engineer. **(Not Applicable)**

Impact Analysis

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Substantial Change from Previous Analysis. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. It is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources and has prepared an Air Quality Management Plan (AQMP) that establishes a program of rules and regulations directed at attaining the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The main purpose of an AQMP is to bring an area into compliance with the

requirements of federal and State ambient air quality standards. For a project to be consistent with the AQMP, the pollutants emitted from the project should not (1) exceed the SCAQMD CEQA air quality significance thresholds or (2) conflict with or exceed the assumptions in the AQMP.

The SCAQMD's 2016 AQMP is the latest approved AQMP and is a regional and multi-agency effort among the SCAQMD, California Air Resources Board (CARB), Southern California Association of Governments (SCAG), and the United States Environmental Protection Agency (USEPA). The 2016 AQMP includes an analysis of emissions, meteorology, atmospheric chemistry, regional growth projects, and the impact of existing control measures. The purpose of the 2016 AQMP is to set forth a comprehensive program that would promote reductions in criteria pollutants, greenhouse gases, and toxic risk and efficiencies in energy use, transportation, and the goods movement (City of West Covina 2019).

Regional Air Quality

The SCAQMD establishes significance thresholds to assess the regional impact of project-related air pollutant emissions in the SCAQMD. As stated above, the first criteria for consistency with the AQMP requires that the Project not exceed the SCAQMD CEQA air quality significance thresholds. Table 1, SCAQMD Regional Emissions Significance Thresholds (lbs/day), summarizes the SCAQMD's mass emissions thresholds for both short-term construction and long-term operational emissions. These thresholds were also used in the air quality analysis for the Certified Final PEIR. A project with emissions below these thresholds is considered to have a less than significant effect on air quality. These regional emission thresholds cannot be used to correlate whether a specific health impact would occur to an individual receptor. These significance thresholds were developed to assist Lead Agencies with a consistent threshold that could be used to determine whether a project's emissions could significantly contribute to the total emissions occurring within an air basin. The totality of the air basin's emissions would determine whether it would be in attainment of the CAAQS and NAAQS.

TABLE 1
SCAQMD REGIONAL EMISSIONS
SIGNIFICANCE THRESHOLDS (LBS/DAY)

Criteria Pollutant	Construction	Operation
Volatile Organic Compounds (VOC)	75	55
Oxides of Nitrogen (NO _x)	100	55
Carbon Monoxide (CO)	550	550
Oxides of Sulfur (SO _x)	150	150
Particulate Matter (PM ₁₀)	150	150
Particulate Matter (PM _{2.5})	55	55
lbs/day: pounds per day		
Source: City of West Covina 2019		

The SCAQMD has established methods to quantify air emissions associated with construction activities such as air pollutant emissions generated by operation of on-site construction equipment; fugitive dust emissions related to trenching and earthwork activities; and mobile (tailpipe) emissions from construction worker vehicle and haul/delivery truck trips.

Emissions were calculated using the California Emissions Estimator Model (CalEEMod version 2016.3.2). CalEEMod is a computer program accepted by the SCAQMD to estimate anticipated

emissions associated with land development projects in California. The CalEEMod output data is included in Attachment A of this CEQA Memorandum.

The SCAQMD regional emissions thresholds (see Table 1) are based on the rate of emissions (i.e., pounds of pollutants emitted per day). Therefore, the quantity, duration, and the intensity of construction activities are important in assuring analysis of worst case (i.e., maximum daily and total emissions) scenarios. Table 2, Estimated Maximum Daily Construction Emissions (lbs/day), summarizes the worst-case daily regional emissions for the Project. MM AIR-2 requires that all off-road diesel-powered construction equipment that is greater than or equal to 50 horsepower meet or exceed U.S. Environmental Protection Agency (USEPA) Tier 3 emission standards. This mitigation measure would be required of the Proposed Project, per the Certified Final PEIR. As shown, all construction pollutants would be below the regional emissions thresholds. This is consistent with the findings for the Approved Project in the Certified Final PEIR.

TABLE 2
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS
(LBS/DAY)

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2020	7	31	20	<1	5	2
Maximum	7	31	20	<1	5	2
SCAQMD Daily Construction Thresholds	75	100	550	150	150	55
Exceeds SCAQMD Thresholds?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compound(s); NO _x : nitrogen oxides; CO: carbon monoxide; SO _x : sulfur oxides; PM ₁₀ : inhalable particulate matter with a diameter of 10 microns or less; PM _{2.5} : fine particulate matter with a diameter of 2.5 microns or less; SCAQMD: South Coast Air Quality Management District. Note: The higher of Winter or Summer data was used for this analysis. Source (thresholds): SCAQMD 2019. CalEEMod output data is in Attachment A.						

Operational emissions are comprised of area, energy, and mobile source emissions. For the Project, there would be no operational trips, because a surface parking lot is not a trip-generating land use. Emissions from area and energy sources would be minimal for the surface parking lot use and may be comprised of sources such as landscape maintenance equipment, reapplication of parking space lines (architectural coating), parking lot lights, and electric vehicle charging stations. As detailed in the Certified Final PEIR, the Approved Project's operational emissions would be less than the SCAQMD CEQA significance thresholds for all criteria pollutants. Therefore, consistent with the Approved Project, the Proposed Project's operational impact on regional emissions would also be less than significant, and no mitigation is required.

Localized Air Quality

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term local impacts to nearby sensitive receptors from onsite emissions of NO₂, CO, PM₁₀, and PM_{2.5} are examined based on SCAQMD's Local Significance Thresholds (LST) methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts.

The LST method is recommended to be limited to projects that are 5.0 acres or less. For the purposes of an LST analysis, the SCAQMD considers receptors where it is possible that an individual could remain in one location for one hour for NO₂ and CO exposure and in one location for 24 hours for

PM10 and PM2.5 exposure. The emissions limits in the lookup tables are based on the SCAQMD's Ambient Air Quality Standards (City of West Covina 2019). The closest receptors to the Project site are the residents of the multi-family dwelling units adjacent to the Project's eastern and southeastern boundary. The emissions thresholds are for receptors within 25 meters (82 feet)¹ of the Project site for all pollutants. The thresholds for receptors farther away would be higher and the Project emissions would be a smaller fraction of the thresholds.

Table 3, Maximum Localized Construction Pollutant Emissions (lbs/day), shows the maximum daily onsite emissions for construction activities compared with the SCAQMD LSTs. The maximum daily emissions would occur during the grading phase, which would occur for two weeks. As shown in Table 3, localized emissions would not exceed the applicable thresholds for NO_x, CO, PM10, and PM2.5.

**TABLE 3
MAXIMUM LOCALIZED CONSTRUCTION POLLUTANT EMISSIONS
(LBS/DAY)**

	NO_x	CO	PM₁₀	PM_{2.5}
Year 2020 Construction Activities	12	14	3	2
SCAQMD LSTs	83	673	5	4
Exceeds SCAQMD Thresholds?	No	No	No	No
lbs/day: pounds per day; NO _x : nitrogen oxides; CO: carbon monoxide; PM ₁₀ : respirable particulate matter with a diameter of 10 microns or less; PM _{2.5} : fine particulate matter with a diameter of 2.5 microns or less; Thresholds for Data is for SCAQMD Source Receptor Area 11, South San Gabriel Valley, 1-acre site, 25-meter receptor distance was used. Source: SCAQMD 2009.				

Toxic Air Contaminants Impacts

The greatest potential for toxic air contaminant (TAC) emissions during construction would be related to diesel particulate emissions associated with heavy equipment operations during site grading activities. The SCAQMD does not consider diesel-related cancer risks from construction equipment to be an issue due to the short-term nature of construction activities. Construction activities associated with the Proposed Project would be short-term (two months). The assessment of cancer risk is typically based on a 30-year exposure period for residential uses. Because exposure to diesel exhaust would be well below the 30-year exposure period, construction of the Proposed Project is not anticipated to result in an elevated cancer risk to exposed persons. As such, consistent with the Certified Final PEIR, Project-related toxic emission impacts during construction would be less than significant. No new impacts that was not previously analyzed would occur, and no mitigation is required.

¹ The SCAQMD recommends that, when sensitive receptors are located nearer than 25 meters (82 feet) from the Project site, the minimum 25 meter/82 foot distance threshold should be used.

AQMP Criterion

Consistent with the Approved Project, the Proposed Project would not exceed the SCAQMD's CEQA air quality significance thresholds for construction activities, as shown in Tables 4 and 5 above. As such, the air pollutant emissions generated by the Project are consistent with the first criterion of not exceeding the SCAQMD CEQA air quality significance thresholds. Regarding the second criterion for AQMP compliance, the Project would not exceed the assumptions of the AQMP because the surface parking lot use has been approved through the process of the Certified Final PEIR. The Proposed Project would not result in population growth or a substantial increase in air pollutant emissions. No conflict with the AQMP would occur with implementation of the Project. Therefore, the Proposed Project would not create a new significant impact pertaining to consistency with achieving the goals of the 2016 AQMP that was not previously analyzed, and no new mitigation is required.

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?

No Substantial Change from Previous Analysis. The SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. As discussed earlier in response to Threshold (a) above, the Project would be consistent with the AQMP, which is intended to bring the South Coast Air Basin (SoCAB) into attainment for all criteria pollutants.² In addition, the mass regional emissions calculated for the Project (Table 2) would be lower than the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining the applicable CAAQS and NAAQS. These health effects are not identified for specific individual receptors nor does the analysis identify the magnitude of health effects. Therefore, the Project would not create a new significant impact pertaining to cumulatively considerable criteria pollutant emissions that was not previously analyzed, and no mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

No Substantial Change from Previous Analysis. As described in response to Threshold (a), the Project would not result in substantial TAC air pollution impacts, and construction criteria pollutant emissions would be less than the LST. Therefore, construction related activities associated with the Proposed Project would not expose any nearby sensitive receptors to substantial pollutant concentrations.

The potential for impacts related to Project traffic along local roadways was also evaluated. A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at level of service (LOS) E or F or causes an intersection that operates at LOS D or better without the project to operate at LOS E or F with the project, there is a potential for a CO hotspot. These CO standards represent the lowest concentration that the federal and State governments consider necessary to protect the health of the public. Exceedance of these standards does not convey information on the severity of the health effect. The Project would not generate new long-term

² Section 15064(h)(3) of the State CEQA Guidelines states "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency".

operational trips as a result of the surface parking lot. Construction trips related workers and material deliveries would be minimal and limited to two months when the parking lot is constructed. Therefore, the Project would not increase congestion at major signalized intersections. There would be less than significant impacts and no excessive exposure of sensitive receptors to Project-generated localized CO concentrations. Therefore, the Project would not create a new significant impact or a more severe impact pertaining to sensitive receptors that we not previously analysis, and no mitigation is required.

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

No Substantial Change from Previous Analysis. According to the SCAQMD's *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Consistent with the Approved Project, the Proposed Project does not include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce objectionable odors. Furthermore, construction activities are also regulated from nuisance odors or other objectionable emissions by SCAQMD Rule 402. Rule 402 prohibits the discharge from any source of air contaminants or other material, which would cause injury, detriment, nuisance, or annoyance to people or the public. Therefore, the Proposed Project would not create a new significant impact pertaining to other emissions that was not previously analyzed, and no mitigation is required.

3.4 BIOLOGICAL RESOURCES

Certified Final PEIR

As indicated in the Certified Final PEIR, the City and surrounding communities are largely urbanized with only isolated areas that support remnant native vegetation. The analysis identified that onsite vegetation is either introduced or weedy species that provide minimal habitat for native animals except for songbirds and small mammals tolerant of human activity (e.g., ground squirrels). The onsite trees and large shrubs may provide some nesting or roosting opportunities for migratory birds or raptors, which could be impacted during construction. However, compliance with the Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, 3511 and 3513 of the *California Fish and Game Code*, as outlined in MMs BIO-1 and BIO-2, would ensure that potential impacts to nesting birds and raptors would be less than significant. Additionally, the planting of hundreds of new trees under the Specific Plan would help continue to provide nesting opportunities for avian species and raptors. Lastly, the Certified Final PEIR identified that the site is not within any established Habitat Conservation Plan (HCP) and Natural Community Conservation Plan (NCCP), and as such no impacts would occur. In terms of potential conflict with policies and ordinances protecting biological resources, including tree preservation policy, it was concluded that removal and replanting of onsite trees for Proposed Project construction would comply with the landscaping requirements of the Specific Plan, and no impacts would occur related to conflicts with local policies or ordinances.

Mitigation Measures

BIO-1 All construction activities shall comply with the federal Migratory Bird Treaty Act of 1918 (MBTA), the Golden Eagle Protection Act, and *California Fish and Game Code* Sections 3503, 3511 and 3513. The MBTA governs the taking and killing of migratory birds, their eggs, parts, and nests and prohibits the take of any migratory bird, their eggs, parts, and nests. Compliance with the MBTA shall be accomplished by completing the following:

Construction activities involving vegetation removal shall be conducted between outside of the peak nesting period (February 1 and September 1), if possible. If it is not possible for construction to occur outside of the peak nesting season, a pre-construction survey by a qualified biologist shall be conducted within 72 hours prior to construction activities to identify any active nesting locations. If the biologist does not find any active nests, the construction work shall be allowed to proceed. The biologist conducting the clearance survey shall document a negative survey with a report indicating that no impacts to active avian nests shall occur.

If the biologist finds an active nest on the Project site and determines that the nest may be impacted, the Biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the biologist in consultation with California Department of Fish and Wildlife (CDFW), and shall be based on the nesting species, its sensitivity to disturbance, and expected types of disturbance. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The Biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent

monitoring shall be provided to the Property Owner, CDFW and the City. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds. Construction within the designated buffer area shall not proceed until written authorization is received by the applicant from CDFW. **(Applicable)**

BIO-2 All construction activities shall comply with Sections 3503, 3503.5, 3511 and 3513 of the *California Fish and Game Code*, which protect active nests of any raptor species, including common raptor species. Compliance with these codes shall be accomplished by completing the following:

If vegetation is to be cleared during the potential raptor nesting season (December 1 to August 31), all suitable habitat within 500 feet of the Project site shall be thoroughly surveyed for the presence of nesting raptors by a qualified biologist within 72 hours prior to clearing. If the biologist does not find any active nests, the construction work shall be allowed to proceed. The biologist conducting the clearance survey shall document a negative survey with a report indicating that no impacts to active avian nests shall occur.

If any active nests are detected, the area shall be flagged and mapped on the construction plans with a buffer. The size of the buffer shall be determined by the biologist in consultation with CDFW, and shall be based on the nesting species, its sensitivity to disturbance, and expected types of disturbance. These buffers are typically 500 feet from the nests of raptors. The buffer area shall be avoided until the nesting cycle is complete or until it is determined that the nest has failed. Results of the pre-construction survey and any subsequent monitoring shall be provided to the Property Owner, CDFW and the City. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds. Construction within the designated buffer area shall not proceed until authorization is received by the applicant from CDFW.

Although presumed absent, prior to development of the Project site, a pre-construction burrowing owl clearance survey shall be conducted to ensure burrowing owls remain absent from the Project site. The clearance survey shall be conducted in accordance with the CDFW 2012 Staff Report on Burrowing Owl Mitigation, which requires that two clearance surveys be conducted 14 – 30 days and 24 hours prior to any grading or vegetation removal on the Project site. If burrowing owls are observed on the Project site during the pre-construction surveys, a burrowing owl passive relocation plan shall be prepared and submitted to CDFW for review and approval prior to commencement of vegetation clearing/grubbing, grading, and construction activities on the Project site. The burrowing owl relocation plan shall outline methods to passively relocate any burrowing owls occurring on the Project site and ensure compliance with the MBTA and *California Fish and Game Code*. **(Applicable)**

Impact Analysis

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?**

No Substantial Change from Previous Analysis. Although the surrounding region does contain a number of sensitive biological resources, as identified in the Certified Final PEIR, the Proposed Project site has been disturbed and subject to high levels of human activity and includes no native vegetation or habitat. Therefore, there is little or no potential for sensitive wildlife species to be present on the site. Similar to the findings in the Certified Final EIR, based on available information and existing site conditions, it is unlikely that listed/sensitive bird species are present or would be present on the Proposed Project site during operation. In light of the above, similar to the conclusion in the Certified Final EIR, no new impacts on federal or state Candidate, Sensitive, or Special Status species, that were not previously identified in the Certified Final PEIR, would result with implementation of the Proposed Project, and no mitigation is required. Migratory birds and raptors are discussed under Threshold d.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US 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?**

No Substantial Change from Previous Analysis. As identified in the Certified Final PEIR, there is no native vegetation or any sensitive natural communities within the QVH campus, including the Proposed Project site. Additionally, there are no water bodies, drainages, or wetlands as defined by State and federal resource agencies. The Walnut Creek Channel (flood control) is immediately adjacent to the north and northwest of the Proposed Project site; however, it contains no resources under the jurisdiction of State or federal resource agencies, and the Proposed Project would not have any direct impacts on this drainage channel. Construction or operational activities would not result in impacts, as the Proposed Project site contains little or no biological resources other than landscaping trees. Therefore, similar to the finding in the Certified Final PEIR, the Proposed Project would have no new impacts on riparian habitat or other sensitive natural community or any federally protected wetlands, that were not previously identified in the Certified Final PEIR, and no mitigation is required.

- 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?**

No Substantial Change from Previous Analysis. The Proposed Project site contains trees that may support avian species, but the Project site, as part of the QVH campus, has been disturbed with a high level of human activity. The Project site is not within any regionally or locally recognized wildlife movement corridors (SCW 2008). According to PlanWC and the General Plan EIR, this portion of the City of West Covina, including the Proposed Project site, does not contain known native wildlife

nursery sites. Additionally, although the Project site is adjacent and to the south of the Walnut Creek (flood control) Channel, the portion of the channel adjacent in the vicinity of the Proposed Project site is lined with concrete with vertical sides and thus would provide little or no actual support for any biological resources. The Proposed Project would not encroach into or impact the flood control corridor (i.e., channel and adjacent maintenance roads); therefore, Project development would not result in new impacts on limited wildlife movement that may occur along the channel. Thus, the Project construction or operation would not have a significant impact on regional wildlife movement through this portion of the San Gabriel Valley or within the south coast region as a whole.

The existing trees on the Proposed Project site may contain or have the potential to provide suitable nesting opportunities for avian species, as discussed in the Certified Final PEIR. In addition, the trees in the surrounding area have a potential to provide suitable nesting opportunities for a variety of raptor species. As described in the Certified Final PEIR, nesting birds are protected pursuant to the MBTA, Bald/Golden Eagle Protection Act, and Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). The literature search indicated eight species of birds and four species of raptors, including Cooper's hawk and Swainson's hawk, may be present in the general Project region. Burrowing owl is considered to be absent from the site and it is not likely to be present in the future due to the lack of available uncovered land; the extensive level of disturbance; and high level of human activity on the site.

Pre-construction clearance surveys for nesting bird and raptor surveys are required to be conducted prior to any vegetation removal, tree removal, or ground disturbing activities that may disrupt the birds during the avian and raptor nesting seasons. The mitigation measures from the Certified Final PEIR (MM BIO-1 and MM BIO-2) would apply to the Proposed Project to address the potential impact to migratory birds and nesting raptors during construction of the Proposed Project.

No new significant impacts pertaining to migratory birds and nesting raptors, that were not previously identified in the Certified Final PEIR, would result with implementation of the Proposed Project, and no new mitigation is required.

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

No Substantial Change from Previous Analysis. As identified in the Certified Final PEIR, the Approved Project's conversion of Sunset Field to hospital-related uses would not be consistent with General Plan Policy 1.11 or Action 1.11b, provided in the Certified Final PEIR. However, a City-wide ballot measure approved by the electorate determined that the proposed park conversion action was consistent with the goals and policies of the General Plan, as the funding from the sale of the land to the QVH would be placed in an account specifically for the purpose of acquiring new parkland. In addition, any street tree replacement, protection, and maintenance associated with implementation of the Approved Project would be conducted in accordance with PlanWC and specific requirements in Chapter 24.16 and Chapter 26 of the City's Municipal Code. Any onsite trees that must be removed as part of construction would be replaced in accordance with the Specific Plan, Section 4.4, Design Guidelines, Landscaping.

The Proposed Project would result in removal of 25 existing trees to accommodate the work on the site; however, the Project would plant a total of 41 trees (per requirement of 1 tree per 10 parking stalls) and provide 11,719 sf (8 percent) of landscaped area. The Project exceeds the requirement by providing 16,980 sf (12 percent) of landscape area. As such the Project would not conflict with local policies and ordinances protecting biological resources, and no new impact that was not previously analyzed in the Certified Final PEIR, would occur, and no mitigation is required.

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?

No Substantial Change from Previous Analysis. As indicated in the Certified Final PEIR, the QVH campus, including the Project site is in a highly urbanized region and not within any established HCP, NCCP, or other approved type of habitat conservation plan. In addition, there are no HCP or NCCP areas within two miles of the Project site. Therefore, the Proposed Project would not have any significant impacts in this regard, and no mitigation is required.

3.5 CULTURAL RESOURCES

Certified Final PEIR

The Certified Final PEIR identified that there are no known historical sites within the QVH campus or in the immediately surrounding area. The Approved Project would not result in any impacts on the closest historic property, located within a half mile of the QVH. Regarding archaeological resource as defined in Section 15064.5, the Certified Final PEIR indicated that even though there are no known archaeological sites located within the Project site or in the immediately surrounding area and the potential for Project-related grading to have significant impacts on archaeological resources is considered low, there is a possibility that unknown archaeological artifacts or resources may be encountered during grading. As such mitigation measures (MM CUL-1 through MM CUL-3) were proposed to reduce the impacts to less than significant level. In terms of paleontological resources, it was indicated that according to the PlanWC's Resource Conservation Element, soils and geologic formations within the City, including the Hospital campus, have a low potential to contain significant paleontological resources. Searches of databases identified that no fossil localities have been previously recorded within one mile of the Project site. Paleontological resources were not anticipated to be discovered during excavation in younger (Holocene) alluvial fan deposits. However, it would be possible that grading in older alluvial materials (i.e., Quaternary) could impact previously undiscovered paleontological resources. As such, mitigation measures (MM CUL-4) was proposed to reduce the potential impact to less than significant. Lastly, the analysis in the PEIR indicated that if human remains are found, state law requires proper treatment for the remains in accordance with applicable regulations. Section 7050.5 of the *California Health and Safety Code* describes the protocols to be followed in the event that human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. Although there was no indication that human remains would be present, it was stated that grading would have the potential to unearth previously undiscovered human remains. As such a mitigation measure (MM CUL-5) was proposed to reduce the potential impact to less than significant level.

Mitigation Measures

CUL-1 A qualified archaeologist (the "Project Archaeologist") shall be retained prior to the start of grading for Project-related construction. The Project Archaeologist shall monitor all ground-disturbing activities within the areas of native soil (i.e., below existing areas of artificial fill from previous hospital construction). If archaeological or historical resources are encountered during implementation of any phase of the Project, the Project Archaeologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity of the find in order to make an evaluation of the find.

If historical materials are found during grading, a qualified historian ("Project Historian") shall be retained to evaluate and make appropriate recommendations on the disposition of any historical artifacts in consultation with the City local historical experts as determined appropriate by the City. The disposition of any archaeological resources shall be governed by Mitigation Measure CUL-3. **(Applicable)**

- CUL-2** Prior to the start of any Project-related grading, the following note shall be placed on the Grading Plan:

“If any suspected archaeological resources are discovered during ground-disturbing activities and the archaeological monitor or Tribal representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and appropriate Tribal representatives to the site to assess the significance of the find.” **(Applicable)**

- CUL-3** The Project Archaeologist shall monitor Project-related grading as outlined in Mitigation Measure CUL-1. Any archaeological resources are uncovered during the course of Project-related grading shall be recorded and/or removed per applicable guidelines, in consultation and cooperation with the City, the South Central Coastal Information Center Staff (located at Cal State Fullerton) and appropriate Native American tribal representatives.

If a significant archaeological resource(s) is discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor and representatives of the appropriate Native American Tribe(s), Hospital Staff, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan and/or preservation plan shall be prepared and by the archaeological monitor and reviewed by representatives of the appropriate Native American Tribe(s), Hospital Staff, and the City Planning Department and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. **(Applicable)**

The Hospital shall relinquish ownership of all archaeological artifacts that are of Native American origin found on the Project site to the culturally affiliated Native American tribe(s) for proper treatment and disposition. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City Planning Department, the appropriate Native American tribe(s), and the South Central Coastal Information Center. All cultural material, excluding sacred, ceremonial, grave goods and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the Project site shall be curated, as determined by the treatment plan, according to the current professional repository standards and may include a culturally affiliated tribal curatorial facility. **(Applicable)**

- CUL-4** A qualified Paleontologist (the “Project Paleontologist”) shall be retained prior to the start of grading for any Project-related construction. Also prior to the start of grading, the Project Paleontologist shall review the grading plan to identify any areas where excavation will occur in native soils that could contain fossils (i.e., older Quaternary alluvium). The Project Paleontologist shall monitor all ground-disturbing activities in those areas and prepare a brief memo report on monitoring activities during that time. If fossiliferous materials are found during grading in other (i.e., non-marked) areas, work shall be halted until the Project Paleontologist is contacted and can evaluate the find and determine an appropriate course of action to protect significant paleontological resources. **(Applicable)**

- CUL-5** If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination

of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code*. The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner. **(Applicable)**

Impact Analysis

Would the project:

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

No Substantial Change from Previous Analysis. The Proposed Project site has been disturbed and is currently undeveloped. Consistent with the findings of the Certified Final PEIR, the Proposed Project does not include any historic resources, and the closest historic resource to the site is a farmhouse within a half mile, at 1127 West Merced Avenue. However, the Approved Project would not result in any direct or indirect impacts on the property. As there are no known historic resources located within the Project area, the Project would not result in a substantial change in the significance of a historical resources. Thus, no new impact pertaining to historic resources that was not previously identified in the Certified Final PEIR, would result, and no mitigation is required.

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

No Substantial Change from Previous Analysis. As identified in the Certified Final PEIR, per the City's General Plan EIR, no known archaeological sites are located within the QVH campus, including the Project site. However, even though the potential for discovery of archaeological resources is considered low, there is a possibility that unknown archaeological artifacts or resources would be encountered during grading activities. To address this potentially significant impact, mitigation measures (MM CUL-1 through MM CUL-3) from the Certified Final PEIR would be implemented to reduce the impacts to less than significant level, consistent with PlanWC Policy 7.7 and Action 7.7. Therefore, no new significant impacts that were not previously identified in the Certified Final PEIR, would result that would require a new mitigation measure.

c) Disturb any human remains, including those interred outside of formal cemeteries?

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, there is no indication that human remains are present within the Project site. In the unlikely event of an unanticipated encounter with human remains at the site, the *California Health and Safety Code* and the *California Public Resources Code* requires that any activity in the area of a potential find be halted and the Los Angeles County Coroner be notified, as described in MM CUL-5. Compliance

with MM CUL-5 would ensure that impacts would be less than significant. The Proposed Project would not result in a new significant impact related to the disruption of human remains, that was not previously identified, and no new mitigation is required.

3.6 ENERGY

Certified Final PEIR

The Certified Final PEIR addressed energy under Section 6.0, Other CEQA Considerations. Section 6.3 of the Certified Final PEIR provided a discussion of potential energy impacts, addressing Appendix F of the State CEQA Guidelines. The analysis quantified the short-term construction energy use and long-term energy use from hospital and medical office buildings for the Approved Project. The Certified Final PEIR noted that fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Approved Project would have no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than comparable equipment at construction sites in other parts of the State. Energy used in the construction of the Approved Project would enable the development of buildings that meet the latest energy efficiency standards, as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption. Fuel consumption associated with vehicle trips was determined to not be considered inefficient, wasteful, and unnecessary, due to the expansion of medical services and employment in a housing-rich area. Lastly, the Certified Final PEIR determined that because the Approved Project proposed expanded medical services to meet the needs of the local population, they would not need to travel further to obtain these services. Based on the above, the Proposed Project was not expected to result in excessive long-term operational building energy demand.

Mitigation Measures

No mitigation measures were required.

Impact Analysis

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?**

No Substantial Change from Previous Analysis. Project construction would require the use of construction equipment for demolition, site preparation, grading, and paving activities which is consistent with the Approved Project. All off-road construction equipment would use diesel and gasoline and would require implementation of Mitigation Measure (MM AIR-2), which requires that all equipment over 50 horsepower meet USEPA Tier 3 standards.

Construction would also include vehicles of construction workers and vendors traveling to and from the Proposed Project site, consistent with the Approved Project. Fuel energy consumed during construction would be temporary in nature, for a duration of two months. Due to the relatively small magnitude of activities, construction activities related to the Project would also not represent a significant demand on energy resources. Furthermore, there are no unusual Project characteristics that would necessitate the use of less energy-efficient construction equipment compared to similar construction sites in other parts of the State. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

Energy use for the Project would consist of electric vehicle charging spaces, lights, and landscaping equipment for the landscaped portions of the surface parking lot. The Proposed Project would not have significant long-term energy uses and would therefore not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during operations. Overall, construction and operation of the Project is necessary to provide parking for hospital and medical office building uses adjacent to the Project site and within the boundaries of the Approved Project site. Therefore, the Proposed Project would not create a new significant impact pertaining to energy consumption of resources that could be wasteful, inefficient, or unnecessary and was not previously analyzed, and no new mitigation is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Substantial Change from Previous Analysis. As discussed above, the Project would use energy during the construction phase. Operation of the Project would not result in a substantial increase in energy consumption beyond what was previously assumed in the Approved Project. As such, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, the Project would not create a significant impact pertaining to a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency, and no new mitigation is required.

3.7 GEOLOGY AND SOILS

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project would result in no impacts pertaining to loss, injury, or death involving fault rupture of a known earthquake fault, as the QVH campus has no known active or potentially active faults, and the campus is not included in an Alquist-Priolo Earthquake Fault Zone. The analysis also indicated that the primary geologic hazard for the Approved Project area is seismic ground shaking; however, implementation of MM GEO-1 would ensure the potential impacts to strong ground shaking would have less than significant impacts.

Further, it was determined that the potential for seismically induced settlement and liquefaction is low, as the campus is not in a designated Liquefaction Hazard Zone. The analysis also identified that the Approved Project site is not located within a Landslide Zone, and the potential for seismically-induced slope instability was considered low.

Additionally, the analysis determined that the Approved Project would have a less than significant impact related to soil erosion during construction and no impact during operation. The Approved Project would comply with the grading regulations of the City and the National Pollutant Discharge Elimination System (NPDES) Construction General Permit to minimize erosion during construction activities. Best Management Practices (BMPs) would also be implemented at each construction site as part of a Storm Water Pollution Prevention Plan (SWPPP). Thus, with adherence to regulations and implementation of MMs HYD-1 and GEO-2, the potential impacts related to erosion would be less than significant.

The Certified Final PEIR indicated that impacts related to unstable soil would be reduced with implementation of MM GEO-1 and MM GEO-2 and compliance with applicable local and State regulatory requirements. Also, potential impacts related to onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant and further reduced with implementation of MMs GEO-1 and GEO-2. Moreover, it was determined that with adherence to applicable regulatory requirements, and future site-specific geotechnical investigations and grading plan submittals, as outlined in MM GEO-1 and GEO-2, potential impacts related to expansive soils would be mitigated if encountered on the site.

Finally, it was indicated that the Project would not include the construction of a septic system, and no impacts would occur.

Mitigation Measures

- GEO-1** Prior to approval of Project plans, a site-specific Geotechnical Report shall be prepared for each proposed structure. The Geotechnical Report shall be prepared by a registered Civil Engineer or certified Engineering Geologist and shall contain site-specific evaluations of the seismic and geologic hazards affecting the Project and shall identify recommendations for earthwork and construction. All recommendations from forthcoming site-specific geotechnical studies shall be included in the site preparation and building design specifications. Compliance with this requirement shall be verified by the City Engineer as part of the Project certification process, which includes review and approval of the site-specific geotechnical studies by the California Geological Survey (CGS). **(Applicable)**

- GEO-2** Prior to the issuance of building permits, the final Grading Certification (on the approved City of West Covina form) shall be prepared, stamped, and signed by the appropriate professional personnel. A California registered Civil Engineer, soil engineer, and geologist (if applicable) and the grading contractor shall sign the final Grading Certification. In addition, the final compaction report shall be signed by the soils engineer and submitted for review and approval by the Building and Safety Official prior to the issuance of building permits. **(Applicable)**

See Hydrology and Water Quality for Mitigation Measure HYD-1.

Impact Analysis

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?**
 - ii) **Strong Seismic groundshaking?**
 - iii) **Seismic-related ground failure, including liquefaction?**
 - iv) **Landslides?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, no known active or potentially active faults traverse the Project site, and the site is not included in an Alquist-Priolo Earthquake Fault Zone (City of West Covina 2019). Thus, the Proposed Project would result in no new impact pertaining to risk of loss, injury, or death involving fault rupture of a known earthquake fault, and no mitigation is required.

Consistent with the discussion in the Certified Final PEIR, the Proposed Project site is situated in a seismically active region, therefore the proposed parking lot may be subject to moderate to large seismic events, resulting in strong seismic ground shaking. However, ground shaking is a common phenomenon in all of Southern California. With adherence to applicable local and State regulatory requirements and future site-specific geotechnical investigations as outlined in MM GEO-1, the Proposed Project would have less than significant impacts related to strong ground shaking. No new mitigation is required.

Similar to the findings of the Certified Final PEIR, , the Project site, is not located within a designated Liquefaction Hazard Zone and thus would not be susceptible to liquefaction (City of West Covina 2019). Additionally, because of the relatively dense nature of the underlying granular material and lack of a shallow groundwater table, potential for liquefaction is low (City of West Covina 2019). Therefore, the potential for seismically induced settlement is also considered low. The Proposed Project would result in less than significant impacts related to seismic-related ground failure. No new impact would occur, and no mitigation is required.

As discussed in the Certified Final PEIR, the Proposed Project site is not located within a Landslide Zone, and thus would not be susceptible to earthquake induced landslides (City of West Covina 2019). Additionally, the Proposed Project site, as part of the QVH campus, is in an area with no significant

slopes, and the potential for seismically-induced slope instability is considered low (City of West Covina 2019). Therefore, the potential impact related to seismically induced landslides is considered low and less than significant. No new impacts pertaining to the above issues that were not previously analyzed in the Certified Final PEIR, would occur, and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

No Substantial Change from Previous Analysis. The Proposed Project is approximately 2.8 acres, therefore it is required to comply with the NPDES Construction General Permit. In compliance with the NPDES permit, erosion potential during construction activities would be managed with BMPs implemented at the Proposed Project's construction site as part of a SWPPP to minimize erosion impacts. The Proposed Project is also required to comply with the grading regulations of the City, which would reduce erosion during construction. Similar to the Approved Project, with adherence to City, regional, and State regulations related to management of windblown dust and other sources of soil erosion, as required in MMs HYD-1 and GEO-2, the Proposed Project would have a less than significant impact related to soil erosion during construction. No new impacts or more severe impacts would occur, and no new mitigation is required. Further, as indicated in the Final Certified PEIR, the Proposed Project-related storm water quality impacts resulting from erosion during operations would have no impact, therefore, no new mitigation that was not previously identified in the Certified Final PEIR for long-term operations would result, and no new mitigation is required.

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?

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the City is not located within an area of land subsidence (USGS 2018). Thus, impacts related to soil instability would be less than significant. Further, any potential impacts related to unstable soil would be reduced with implementation of MM GEO-1, requiring site-specific geotechnical investigations and MM GEO-2, requiring approval of the final grading plan, appropriate certifications, and compaction reports per the City's grading requirements. In addition, the Proposed Project would comply with applicable local and State regulatory requirements. Therefore, potential impacts related to onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant and further reduced with implementation of MMs GEO-1 and GEO-2. No new or more severe impacts would occur that were not previously analyzed, and no new mitigation is required.

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?

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the onsite soils are granular and have low expansion potential (City of West Covina 2019). Therefore, specialized construction procedures to resist expansive soil activity are not anticipated for construction of the proposed Project. However, the potential to encounter expansive soil is considered a potentially significant impact, as identified in the Certified Final PEIR for the campus as a whole. With adherence to applicable regulatory requirements, and future site-specific geotechnical investigations and grading plan submittals, as outlined in MMs GEO-1 and GEO-2, there would be less than significant impacts related to expansive soils, if encountered on the site. No new or more severe impact that was not previously analyzed in the Certified Final PEIR would occur, and no new mitigation is required.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Substantial Change from Previous Analysis. Similar to the findings of the Certified Final PEIR, the Proposed Project does not include construction of a septic system, and there are no areas on the Proposed Project that contain existing or past septic systems or improvements, as was concluded in the Certified Final PEIR. Therefore, no new impact would occur that was not previously analyzed, and no mitigation is required.

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

No Substantial Change from Previous Analysis. This analysis was included in the Cultural Resources section in the Certified Final PEIR. Consistent with the findings of the Certified Final PEIR, soils and geologic formations within the City, including the Proposed Project area, have a low potential to contain significant paleontological resources. Paleontological resources are not anticipated to be discovered during excavation in younger (Holocene) alluvial fan deposits. However, it is possible that grading in older alluvial materials (i.e., Quaternary) could impact previously undiscovered paleontological resources. Even though excavation for the proposed surface parking lot may not reach older alluvial materials, to avoid any potential impact, MM CUL-4 from the Certified Final PEIR, consistent with the City's General Plan policies, would be applicable. No new impacts that was not previously analyzed would result, and no new mitigation is required.

3.8 GREENHOUSE GAS EMISSIONS

Certified Final PEIR

The Certified Final PEIR quantified construction and operational GHG emissions for full buildout of the Approved Project. Even with Mitigation Measure (MM GHG-1), which requires that the Hospital install solar photovoltaic panels that generate at least 25 percent of the additional electricity demand associated with the proposed structures, emissions were found to exceed the SCAQMD's recommended thresholds. In the absence of adopted thresholds, the Tier 3 threshold (3,000 MTCO₂e/year [metric tons of carbon dioxide equivalent/year]) and Tier 4 thresholds were used for this analysis (City of West Covina 2019). The Approved Project was determined to not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, due to the exceedances of the SCAQMD's recommended Tier 3 and Tier 4 thresholds of significance, even with the implementation of MM GHG-1, impacts were determined to be significant and unavoidable.

Mitigation Measures

- GHG-1** Prior to completion of all new Project-related buildings or structures, the Hospital shall install solar photovoltaic panels that generate at least 25 percent of the additional electricity demand associated with the new Project-related structure(s). The location, size, and other design parameters of the panels shall be at the discretion of the Hospital. This measure shall be implemented to the satisfaction of the City Engineer. **(Not Applicable)**

Impact Analysis

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

No Substantial Change from Previous Analysis. Consistent with the approach used for the Certified Final PEIR, GHG emissions from the Proposed Project are quantified based on the methodologies proposed by SCAQMD's GHG CEQA Significance Threshold Working Group, and therefore, the SCAQMD-recommended Tier 3 threshold of 3,000 MTCO₂e/year is used for this analysis.

Construction GHG emissions are generated by vehicle engine exhaust from construction equipment, on-road hauling trucks, vendor trips, and worker commuting trips. Each construction activity has associated off-road equipment (e.g., rollers, backhoes,) and on-road vehicles (e.g., haul trucks, concrete trucks, worker commute vehicles). Construction related GHG emissions were calculated by using the CalEEMod emissions inventory model as described in Section 3.3, Air Quality. The results of the modeling are shown in MTCO₂e/yr. The estimated construction GHG emissions for the Project are shown in Table 4.

GHG emissions generated from construction activities are finite and occur for a relatively short-term period. Unlike the numerous opportunities available to reduce a project's long-term GHG emissions through design features, operational restrictions, use of green-building materials, and other methods, GHG emissions-reduction measures for construction equipment are relatively limited. Therefore,

SCAQMD staff recommended 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. As shown in Table 4, Estimated GHG Emissions from Construction, the 30-year amortized construction emissions would be 2 MTCO₂e/yr. It should be noted that since the Proposed Project was included in the Certified Final PEIR, the emissions for the Project have been accounted for previously. However, for purposes of this analysis, GHG emissions are included to provide context for emissions compared to the threshold.

**TABLE 4
ESTIMATED GHG EMISSIONS FROM CONSTRUCTION**

Year	Emissions (MTCO₂e)
2020	53
Total	53
Annual Emissions*	2
SCAQMD Tier 3 Threshold	3,000
Exceeds Threshold?	No
MTCO ₂ e: metric tons of carbon dioxide equivalent	
* Combined total amortized over 30 years	

Operations

Once construction of the Project is complete, there would be negligible GHG emissions associated with lighting for the Project. The surface parking lot is not a trip-generating use, and therefore, there would be no mobile source emissions. Emissions from area and energy sources would be minimal and may be comprised of sources such as landscape maintenance equipment, surface parking lot lights, and electric vehicle charging stations. Therefore, any Project-generated change in GHG emissions would be nominal.

As shown in Table 4, the estimated increase in annual amortized GHG emissions would be 2 MTCO₂e/yr. This value may be compared with and is less than the proposed SCAQMD screening threshold of 3,000 MTCO₂e/yr. It is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change; therefore, any impact would be considered on a cumulative basis. Additionally, as stated previously, the Project's GHG emissions were accounted for within the Certified Final PEIR. Therefore, the Project would not create a new significant impact pertaining to GHG emissions that was not previously analyzed, and no mitigation is required.

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

No Substantial Change from Previous Analysis. The Proposed Project would provide surface parking spaces to accommodate hospital and medical office building uses of the Approved Project. The Project would be required to comply with 2019 California Green Building Standard Code (CALGreen Code). CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, recycling and recycled materials, storm water management, among others. Additionally, the Project would provide 34 electric vehicle charging spaces. The Project's emissions would be substantially less than the SCAQMD-recommended 3,000 MTCO₂e/yr Tier 3 threshold, as shown in Table 4, above. Because the Project would provide parking to support local medical

infrastructure, comply with the CALGreen Code, provide fueling for alternative electric vehicles, and result in minimal amounts of GHG emissions, the Proposed Project would not create a new significant impact pertaining to conflict with GHG emissions reduction plans that was not previously analyzed, and no mitigation is required.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Certified Final PEIR

The Certified Final PEIR determined that the construction and operation of all phases of the Approved Project would involve handling of hazardous materials in limited quantities and typical to hospitals in urban environments. Through compliance with applicable regulations, there would be less than significant impacts associated with the transport, use, or disposal of hazardous materials during construction or operation, and no mitigation was required. It was additionally identified that due to the age of some hospital buildings, it is possible that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) would be present. If present, these materials would need to be remediated prior to demolition or substantial remodeling of any buildings.

Further, the analysis identified that the Approved Project would not result in the accidental release of hazardous materials that would impact the environment or introduce a risk to public health or safety with implementation of Mitigation Measures (MMs HAZ-1 and HAZ-2). Moreover, the analysis in the Certified Final PEIR determined that despite the proximity to Edgewood Middle School and Edgewood High School (within 0.05 mile), the Hospital facilities staff did not identify any recent or historical incidents involving hazardous materials. However, to err on the side of caution, MM HAZ-3 was proposed. Additionally, no impacts pertaining to hazmat sites in or near the Project site on the official "Cortese List" (DTSC 2018b), maintained by the Department of Toxic Substances Control (DTSC), pursuant to Government Code Section 65962.5 (Appendix F), were identified. Also, it was indicated that the closest airport to the Approved Project site is the El Monte Airport in the City of El Monte (within 5.1 miles), and no private airstrips are within two miles of the Project site. Thus, no impacts were identified. In addition, the Approved Project site is at the intersection of two major streets in the City that have been fully improved within their rights-of-way. No impacts pertaining to emergency response, evacuation, or disaster plans were identified. Lastly, the Approved Project site is in a fully developed urban area surrounded by development, roads, and freeways. No significant impacts related to wildland fires were identified, and no mitigation was required.

Mitigation Measures

HAZ-1 Prior to the start of any grading or excavation during Project-related improvements, the Hospital shall have on staff or retain qualified personnel to be available should any unknown potentially hazardous materials (hazmat) be found during grading or excavation. If any unknown or suspected hazardous materials are found, work in that area shall cease immediately and the qualified hazmat professional shall evaluate/characterize the find and make appropriate recommendations for its safe removal and disposal according to applicable federal and state laws and regulations. The qualified hazmat professional shall also determine if consultation and coordination with the California Department of Toxic Substances Control (DTSC) is necessary to characterize and/or remediate the hazardous material(s). The Hospital shall inform the City Planning Department on the same day such materials are found.

If necessary, the Hospital shall enter into a Voluntary Cleanup Agreement with DTSC for remediation of the hazardous materials. Within two weeks of disposal of the material(s), the qualified hazmat professional shall prepare a closure report on the incident and submit it to the Hospital and City Planning Department. This measure shall be implemented to the satisfaction of the City Planning Department and DTSC if they are involved in the characterization and/or remediation of the material(s).
(Applicable)

HAZ-2 Prior to demolition of any structures or interior remodeling of existing buildings, the hospital shall provide evidence that an assessment for asbestos-containing materials (ACMs) and lead-based paint (LBP) has been performed and any necessary abatement has been conducted in accordance with local, State, and federal guidelines. This measure shall be implemented to the satisfaction of the City Planning Department. **(Not Applicable)**

HAZ-3 Prior to the start of Project construction and at least annually thereafter during the Project construction period, the Hospital Facilities Staff shall meet with the principals of the Edgewood Middle and High Schools and the Superintendent of the West Covina Unified School District to review the planned hospital expansion and discuss health and safety issues relative to hazardous materials at the hospital. The Hospital Staff shall also share their hazmat response and disaster preparedness plans with the school and district personnel so each has an understanding of potential risks, lines of communication and responsibility, and can comment on the plans as they may affect the adjacent school facilities. This measure shall be implemented to the satisfaction of the City Planning Director. **(Not Applicable)**

Impact Analysis

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?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would primarily involve the use of common hazardous materials, including oil and grease, solvents, diesel fuel, and other chemicals in vehicles, trucks, and heavy equipment during construction. Construction of the Proposed Project would not require extensive or on-going use of acutely hazardous materials or substances. Construction activities would be completed within two months and would involve the limited transport, storage, use, and/or disposal of common construction-related hazardous materials.

Additionally, similar to the findings of the Certified Final PEIR, the potential for substantial release of hazardous materials impacting public health or safety would be minimal. The offsite uses that were identified in government databases no longer pose a risk, as those cases were closed or eligible for closure. The Proposed Project would not create a new significant impact related to transport and use or accidental release of hazardous materials, that was not previously analyzed, and no mitigation is required.

However, although based on the available information, the Proposed Project does not have a potential to result in the accidental release of hazardous materials that would represent a significant impact on the environment or a significant risk to public health or safety, MM HAZ-1 would apply in case any unknown or suspected hazardous materials are found during excavation. In addition, the potential for surrounding land uses to cause a significant impact on the Proposed Project relative to hazardous materials is also less than significant, and no additional mitigation is warranted.

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

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, despite proximity to Edgewood Middle School and Edgewood High School, the Hospital staff have not identified any incidents in the QVH involving hazardous materials. Additionally, the Proposed Project is a surface parking lot and would not involve handling hazardous or acutely hazardous materials such that would potentially impact the said schools. The Modified Project would not create a new significant impact pertaining to handling of hazardous materials, substances, or waste within ¼-mile of a school that was not previously analyzed, and no new mitigation is required. Due to the nature and scope of the Proposed Project, implementation of MM HAZ-3 is not required.

d) Be located on a site which 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 Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, there are no hazmat sites on or near the Project site that are on the official “Cortese List” (City of West Covina 2019) maintained by the DTSC, pursuant to Government Code Section 65962.5. Therefore, the Proposed Project would not create a new significant impact on hazardous materials sites that was not previously analyzed, and no mitigation is required.

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 Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the closest airport to the Project site is the El Monte Airport located at 4233 Santa Anita Avenue, in the City of El Monte, which is approximately 5.2 miles northwest of the Proposed Project site. The Proposed Project is implementation of a surface parking lot and as such would not result in a safety hazard nor create a new significant impact on air traffic hazards that was not previously analyzed, and no mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project site is 1,350 feet from Sunset Avenue and 1,800 feet from Merced Avenue, which are two major streets that are fully improved, and the site is easily accessible from these streets. In addition, the QVH has prepared and maintains emergency and disaster preparedness plans that are regularly coordinated with City staff since the QVH provides critical public services on an ongoing basis and during emergencies and disasters. The Proposed Project construction and operation would not interfere with any adopted emergency response and evaluation plans. Therefore, the Proposed Project would not create a new significant impact related to emergency response or emergency evacuation plan that was not previously identified or analyzed, and no mitigation is required.

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

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project is in a fully developed urban area surrounded by development, roads, and

freeways, as such the site is not located in proximity to any fire hazard severity zones. Additionally, the Proposed Project activities would not involve construction or operation of habitable structures in wildland areas. Therefore, the Proposed Project would not create a new significant impact related to wildfire hazards that was not previously identified or analyzed, and no mitigation is required.

3.10 HYDROLOGY AND WATER QUALITY

Certified Final PEIR

The Certified Final PEIR determined that the Approve Project's construction and operation activities would contribute to violations of water quality standards and the degradation of storm water quality. Compliance with the requirements of the NPDES Construction General Permit, including preparation of a SWPPP as outlined in Mitigation Measure HYD-1, would ensure impacts to receiving waters would be reduced to less than significant levels. In addition, implementation of onsite BMPs would remove pollutants in the storm water from the campus and prevent pollutants from entering Walnut Creek Wash and San Gabriel River. The analysis concluded that both short- and long-term potential water quality-related impacts would be reduced to less than significant levels with implementation of MMs HYD-1 and HYD-2. Further, the implementation of the Approved Project could cause potential changes in surface runoff that would degrade water quality; however, with implementation of MM HYD-3, potential changes in drainage patterns on site that could lead to erosion, siltation, or flooding at downstream facilities would be reduced to less than significant levels. Additionally, regarding flood hazards, the Certified Final PEIR indicated that the Approved Project would not place any structures within a 100-year flood zone or impede or redirect flood flows. Further, the analysis in the Certified Final PEIR identified that expansion of the QVH and associated services would increase potable water use, but the increase was not expected to have significant impact on local water supplies, including the use of local groundwater. Implementation of the Approved Project would result in an incremental increase of offsite runoff and incrementally reduce recharge of the local groundwater by reducing infiltration flow from the former park site. However, implementation of the recommended MM HYD-3 would help reduce this potential impact to a less than significant level. Lastly, the analysis concluded that the Approved Project would not experience significant impacts related to flooding from dam failure, seiches, tsunamis, or mudflows, as the Santa Fe Dam did not impound enough water to represent a significant flooding threat; there were no enclosed bodies of water within a half mile upstream to result in a seiche; the QVH is 29 miles inland from the Pacific Ocean that would be impacted by a tsunami; and the QVH campus is not proximate to any steep slopes that would cause mud flow.

Mitigation Measures

- HYD-1** Prior to issuance of any grading or building permit, the Queen of the Valley Hospital shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (Construction General Permit) applicable at the time the grading or building permit is issued. The Queen of the Valley Hospital shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) during construction of any Project-related improvements. The SWPPP must include erosion- and sediment-control Best Management Practices (BMPs) that will meet or exceed measures required by the determined risk level of the Construction General Permit, as well as BMPs that control the other potential construction-related pollutants. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. Evidence of compliance with the NPDES Construction General Permit shall be provided to the City's Building and Safety Services Director prior to issuance of a grading permit. This measure shall be implemented to the satisfaction of the City Engineer. **(Applicable)**

HYD-2 Prior to issuance of any grading or building permit, the Queen of the Valley Hospital shall submit a Water Quality Management Plan (WQMP) for review and approval by the City's Engineering Department. The WQMP shall identify all BMPs to be incorporated into the Project to control storm water and non-storm water pollutants during and after construction (i.e., ongoing operations of the hospital). This measure shall be implemented to the satisfaction of the City Engineer. **(Applicable)**

HYD-3 Prior to issuance of any building permits, the Queen of the Valley Hospital, its engineer, and/or its contractor shall demonstrate that all applicable Low Impact Development (LID) design requirements have been included in Project plans and shall be implemented in each phase of the Project, as appropriate. LID design aspects of each facility of the Project shall include an evaluation of the use of permeable pavement and other infiltration enhancement techniques. This measure shall be implemented to the satisfaction of the City Engineer. **(Applicable)**

Impact Analysis

Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

No Substantial Change from Previous Analysis. The Certified Final PEIR discussion and analysis of potential impacts pertaining to water quality and water quality standards for the campus included the Proposed Project site. It is recognized that construction of the proposed Project could result in short-term construction impacts to surface water quality from construction-related activities. However, compliance with the requirements of the NPDES Construction General Permit, including preparation of a SWPPP, as outlined in MM HYD-1, would ensure impacts from the Proposed Project to receiving waters from storm water and non-storm water discharges during construction would be reduced to less than significant levels.

In addition, implementation of onsite BMPs, including source-control BMPs, would remove pollutants in the storm water from the Project site and prevent contributions to water pollution to Walnut Creek Wash and ultimately to the San Gabriel River. Compliance with MM HYD-1 and HYD-2 would avoid violations of water quality standards and impact to storm water quality. Thus, short- and long-term potential impacts pertaining to water quality would be reduced to less than significant levels.

Furthermore, with implementation of MM HYD-1 through MM HYD-3, the Proposed Project would be consistent with Policies 1.4, 1.5 and Actions 1.4 and 1.5 of PlanWC in addition to Policy 5.7 and Action 5.7a, which address protection of water quality and reducing urban pollution in local drainages.

No new significant impacts or more severe impacts pertaining to water quality and violating water quality standards, that were not previously analyzed would occur, and no new mitigation is required.

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

No Substantial Change from Previous Analysis. The City of West Covina is underlain by the San Gabriel Valley Groundwater Basin. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies. The Project site has been largely pervious, and its conversion to an impervious surface, the proposed surface parking lot, could incrementally increase offsite runoff and incrementally reduce recharge of the local groundwater by reducing infiltration flow from the surface parking lot. However, implementation of MM HYD-3, which requires implementation of Low Impact Development (LID) designs and improvements to help allow for onsite infiltration of runoff, would help reduce this potential impact to a less than significant level. The Proposed Project would not create a new significant impact on groundwater supplies that was not previously analyzed, and no new mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including 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?**

No Substantial Change from Previous Analysis. Of the five major drainages within the City, the Walnut Creek (flood control) Channel runs east to west and is just north of the QVH property and flows west into the San Gabriel River approximately two miles west of the City.

The Proposed Project would not change the existing drainage pattern. As indicated above, construction of the Proposed Project would convert the existing pervious to an impervious surface, which may incrementally increase onsite runoff. However, implementation of MM HYD-3, which requires implementation of LID designs and improvements to help allow for onsite infiltration of runoff, would help reduce this potential impact to a less than significant level. Also, Surface water quality in the City is governed by the Los Angeles Regional Water Quality Control Board (RWQCB), which sets water quality standards in the Water Quality Control Plan for the Los Angeles Region.

According to the Federal Emergency Management Agency (FEMA), the site is in an area of 0.2 percent annual chance of flood (i.e., 500-year storm event). Structural or Treatment Control BMPs are required for this Project under the LID conditions required by the City. Various stormwater treatment facilities are to be provided throughout the site to capture and treat stormwater runoff from the site. Additionally, implementation of MM HYD-3 would prevent potential changes in surface runoff that would degrade water quality.

The Proposed Project would not create a new significant impact that was not previously analyzed, and no new mitigation is required.

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

Consistent with the findings of the Certified Final PEIR, there is no risk of on-site hazard due to tsunamis, seiche, or mudflow due to the location of the Project. The Proposed Project site is 29 miles inland from the Pacific Ocean and at an elevation of 360 feet higher than sea level. Thus, tsunamis would not pose a threat, and no significant impact is anticipated.

A seiche is a standing wave within an enclosed body of water. There are no such bodies of water or tanks within a half mile and at a higher elevation that would result in substantial water flow at the Proposed Project site. Therefore, the Project would not be subject to significant impacts from seiches.

Additionally, the Project site is not in proximity to any steep slopes, that could result in mud flow across the site. Thus, the proposed surface parking lot would not be subject to a significant impact from mudflows.

Therefore, the Proposed Project would not create new significant impacts related to tsunami, seiche, and mud flow that were not previously analyzed, and no mitigation is required.

3.11 LAND USE AND PLANNING

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project would not physically divide an established community, as the QVH campus was developed with hospital-related uses and facilities, and no established community existed within campus. Thus, no impacts would result. Additionally, with approval of the General Plan Amendment, Zone Change, and Specific Plan, the Approved Project would be consistent with short- and long-range goals, policies, and actions outlined in PlanWC and with regional planning goals developed by the Southern California Association of Government (SCAG). With implementation of MM LUP-1, potential land use or planning impacts of the Project would be less than significant. Lastly, the Certified Final PEIR determined that the Approved Project would not result in any conflicts with HCP or NCCP, as none exists in the vicinity of the site.

Mitigation Measures

- LUP-1** Except for surface parking, any improved uses placed adjacent to the residential uses to the northeast of the QVHSP property, including the former Sunset Field site, shall be located and designed to minimize impacts related to views, lighting, and noise on local residents. In addition to the required noticing for precise plans per the Municipal Code, property owners and residents living northeast of the site (i.e., Torrey Pines Apartment Homes) shall be notified of a public hearing at least 30 days prior to the hearing for any buildings in the portions of Specific Plan Zones 1 or 3, adjacent to these residences. This process is in addition to the Municipal Code's requirement to hold a public hearing for new buildings and to notify owners and residents within 300 feet of the proposed building of the public hearing. This measure shall be implemented to the satisfaction of the City Community Development Director. **(Not Applicable)**

Impact Analysis

Would the project:

a) Physically divide an established community?

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would not be expected to physically divide an existing community, as the site is currently undeveloped and no established community exists on the site. There is an existing residential development to the northeast of the site (i.e., Torrey Pines Apartment Homes). The development of a surface parking lot would not encroach into the existing development, nor would it restrict access to them. The Proposed Project would not physically divide the surrounding adjacent community during construction or operation. No new significant impact that was not previously analyzed, would occur, and no mitigation is required.

c) 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?

No Substantial Change from Previous Analysis. The Certified Final PEIR determined that with the amendment to the General Plan Land Use Map to change the land use designation of the former Sunset Field (i.e., Proposed Project) site from "Parks and Open Spaces" to "Commercial" the Approved

Project would be consistent with applicable goals, policies, and actions of the General Plan. In light of this approval as part of the Certified Final PEIR, the Proposed Project would not result in any inconsistency with the General Plan. No impacts would occur, and no mitigation is required.

Additionally, since the Proposed Project is consistent with what was approved as part of the Certified Final PEIR and no changes have occurred that would result in a new significant impact, the Proposed Project would also be consistent with the regional planning goals developed by the Southern California Association of Governments (SCAG). No new significant impacts would result, and no mitigation is required.

Overall, the Proposed Project would not result in a new significant impact pertaining to conflict with any land use plan, policy, or regulation that was not previously analyzed, and no mitigation is required.

3.12 MINERAL RESOURCES

Certified Final PEIR

This topic was focused out from analysis in the Certified Final PEIR.

According to the California Geological Survey (CGS) mapping website, a portion of the City, including all of the Hospital campus, including the Proposed Project site, is in an MRZ-2 zone, which contains known mineral resources. However, the entire City, including the Proposed Project site, is developed with various urban uses, so implementation of the Proposed Project would have no significant impacts on available mineral resources. Therefore, this issue will not be evaluated further in this CEQA Memorandum.

3.13 NOISE

Certified Final PEIR

The Certified Final PEIR determined that the Approved Project would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above existing levels, and therefore, there would be less than significant impact. The Approved Project would not generate or expose persons or structures to excessive groundborne vibration from the construction; all Project-related vibration levels would be below the annoyance and structural damage thresholds at nearby offsite structures. Approved Project-related noise would not exceed established thresholds relative to offsite noise generated by onsite traffic as well as from future onsite sources and would therefore have less than significant impact. It was also determined that the Approved Project would not result in exposure of people residing or working in the Project area to excessive noise levels from either airport or airstrip-related activities.

Mitigation Measures

No mitigation measures were required.

Impact Analysis

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?**

No Substantial Change from Previous Analysis. The Project's construction and operational activities were quantified within the Approved Project. Noise level increases associated with construction-related truck trips were not anticipated to result in an audible (+5 a-weighted decibel scale [dBA]) change in noise levels due to the relatively small number of truck trips compared to existing traffic volumes. This noise impact was determined to be less than significant due to the limited duration of occurrence and because construction traffic would be limited to the allowed hours of construction activity. Noise from construction activities on Proposed Project site would intermittently exceed the ambient noise level by more than 5 dBA. The Project would be required to comply with the requirements established under Municipal Code Section 15-95 – Construction and Building Projects. Therefore, consistent with the Approved Project, the Project would likewise have less than significant impacts for temporary increases in ambient noise levels from construction activities. Similarly, since the Project would not generate vehicle trips and does not include any stationary sources of noise, the Project would not create a new significant impact pertaining to substantial permanent increases in ambient noise levels in excess of applicable standards that was not previously analyzed, and no mitigation is required.

- b) **Generation of excessive groundborne vibration or groundborne noise levels?**

No Substantial Change from Previous Analysis. Construction and operation of the Project was included within the vibration analysis quantified within the Certified Final PEIR. Specifically, the parking lot use considered the closest locations of construction equipment relative to the multi-family residential uses (Torrey Pines), which is adjacent to the Project's eastern and southeastern boundaries. The analysis demonstrated that the vibration levels for construction activities would not

exceed the annoyance or structural damage criteria at the Project site. The Project would also have construction equipment operating at the same distances as those analyzed in the Certified Final PEIR. Therefore, consistent with the Approved Project, the Proposed Project would also result in less than significant impacts to generation of excessive groundborne vibration or groundborne noise levels. Therefore, the Project would not create a new significant impact associated with groundborne vibration or noise levels that was not previously analyzed, and no mitigation is required.

- 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 Substantial Change from Previous Analysis. Consistent with the Approved Project, the Project site is located approximately 7 miles northwest of the San Gabriel Valley Airport. The Project site is also located well outside the existing and projected 65-dBA CNEL noise contour, which would occur within 2 miles of an airport. Aircraft overflights do not significantly contribute to the noise environment at the Project site, and the Project would not expose users of the surface parking lot to excessive noise levels. In addition, the Project site is not located within the vicinity of a private airstrip. Therefore, the Project would not create a new significant impact associated with excessive noise levels proximate to public or private airports that was not previously analyzed, and no mitigation is required.

3.14 POPULATION AND HOUSING

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project would not induce population growth, either directly or indirectly, as no residential units were proposed as part of the Approved Project and the potential increase in employment would be negligible and would not result in a significant impact. Additionally, it was identified that the Approved Project would not displace existing housing or people, necessitating the construction of housing elsewhere, as no housing existed within the campus.

Mitigation Measures

No mitigation measures were required.

Impact Analysis

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)?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project site never provided residential housing, and no existing nearby homes would be removed or relocated as a result of the Proposed Project. The Proposed Project does not involve the construction of habitable structures; therefore, it would not induce substantial population growth directly. Additionally, consistent with the findings of the Certified Final PEIR, the on-site infrastructure improvements would address the needs of the Proposed Project and would not expand roads or other infrastructure off-site such that would result in indirect population growth. Further, the Proposed Project would generate short-term construction jobs but as indicated in the Certified PEIR, the construction jobs would be typically filled by existing residents of the region and would not induce housing demand near the construction site due to the temporary nature of construction projects. Thus, the potential growth associated with project-generated jobs during construction would not be substantial. Therefore, direct or indirect population growth as a result of the Proposed Project would not result in a new impact that was not previously discussed or analyzed, and no mitigation is required.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, and as indicated above and in the Land Use Section, the Project is development of a parking lot in an undeveloped site. There is no existing housing and associated population on the site that would be displaced as a result of the Proposed Project. Therefore, construction of replacement housing elsewhere would not be required. The Proposed Project would not create a new significant impact pertaining to displacement of people or housing that was not previously discussed or analyzed, and no mitigation is required.

3.15 PUBLIC SERVICES AND RECREATION

Certified Final PEIR

The Certified Final PEIR identified that no new, expanded, or altered fire protection services or facilities would be required to provide fire protection service in the future for the Approved Project. Implementation of MMs PS-1 and PS-2 would help ensure that impacts related to increased demand for fire protection services would be reduced to less than significant levels. Further, the Approved Project would comply with all applicable codes, ordinances, and requirements related to safety in addition to payment of development impact fees (DIFs). The Approved Project would not require new or physically altered police facilities that would result in significant environmental impacts. With implementation of MMs PS-1 and PS-3, impacts related to police protection services would be less than significant. Additionally, the Approved Project would not increase demand on the existing school system in the area. The Certified Final PEIR identified that hospital associated uses would not involve development of a residential component that would result in a direct increase/generation of population. With implementation of MM PS-4, the potential impacts would be reduced to less than significant. Further, implementation of the Approved Project would not require new or physically altered parks or recreation facilities. The Certified Final PEIR identified the City would continue to be in compliance with the Quimby Act despite the conversion of the Sunset Field property to hospital-related uses, and impacts would be less than significant. Lastly, the Approved Project would not result in generation of population such that would increase demand on the existing libraries serving the City. The Approved Project would not result in construction of new or physically altered library facilities. No physical impacts would occur.

Mitigation Measures

- PS-1** Pursuant to Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, prior to issuance of each building permit, the Queen of the Valley Hospital shall be responsible for payment of the City's Development Impact Fees (DIFs) including police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as appropriate and in amounts established by City Council Resolution. The fees paid shall be those in effect at the time of issuance of the building permit, subject to applicable fee credits for community facilities provided as part of the Project. **(Applicable)**
- PS-2** The Queen of the Valley Hospital shall verify that all Project-related improvements comply with applicable codes, ordinances and standard conditions, including the current edition of the California Fire Code and the West Covina Fire Department regarding fire prevention and suppression measures, fire hydrants, automatic fire extinguishing systems, access, water availability, and fire sprinkler system, among other measures. Prior to issuance of building permits, the Planning Department and West Covina Fire Department shall verify compliance with applicable codes and that appropriate fire safety measures are included in the project design. All such codes shall be complied with and all measures shall be implemented prior to issuance of a certificate of occupancy. **(Applicable)**
- PS-3** The Hospital shall comply with PlanWC appropriate Crime Prevention Through Environmental Design (CPTED) features as determined by West Covina Police Department (WCPD) for all improvements related to the Proposed Project. CPTED features incorporated into the design of spaces shall include, but not be limited to, territorial reinforcement, strategic natural surveillance, well-lit spaces, and

appropriate maintenance. CPTED review of each proposed development shall be completed by the WCPD prior to issuance of building permits. **(Applicable)**

- PS-4** Prior to the issuance of each building permit, the Property Owner/Developer shall pay applicable developer's fees to the impacted school district(s) pursuant to Section 65995 of the *California Government Code*. Under State law, payment of the developer fees provides full and complete mitigation of the project's impacts on school facilities. Evidence that these fees have been paid shall be submitted to the Planning Department. **(Not Applicable)**

Impact Analysis

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:**
- i) **Fire protection?**
 - ii) **Police protection?**
 - iii) **Schools?**
 - iv) **Parks?**
 - v) **Other public facilities?**

No Substantial Change from Previous Analysis.

Fire Protection

No Substantial Change from Previous Analysis. Development of the Proposed Project would provide additional surface parking until new parking structures can be built. Compared to the Approved Project, the Proposed Project would result in substantially reduced demand for fire protection services. Additionally, the Proposed Project does not include a residential component and would not directly or indirectly induce population growth such that would result in increased demand for fire protection services. The Proposed Project may minimally increase the demand for fire protection and emergency services compared to existing levels. However, this minimal increase was already analyzed in the Certified Final PEIR, as part of projected demand for such services. Development of the Proposed Project would comply with all applicable code and ordinance requirements including but not limited to construction, access, water mains, fire flows, and fire hydrants. In addition, the Proposed Project would be required to pay all applicable DIFs including fire facilities, as outlined in MMs PS-1 and PS-2. The Project's potential impacts on fire protection services would be less than significant, no new impact would result that was not previously analyzed, and no new mitigation is required.

Police Protection

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would not involve construction or operation of structures or infrastructure such that would increase demand for long-term police protection services.

Additionally, as previously indicated, the Proposed Project does not include a housing component and would not induce population growth, resulting in increased demand for police protection services. The Proposed Project may minimally increase the demand for police protection services compared to existing levels. However, this minimal increase was already analyzed in the Certified Final PEIR, as part of projected demand for such services. The Proposed Project's compliance with MMs PS-2 and PS-3, would ensure impacts would be less than significant, no new impact that was not previously analyzed would result, and no new mitigation is required.

Schools

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would not generate demand for schools, as the Project does not involve development of new land uses such that would generate population and associated demand for school services. Even though no impact would result, MM PS-4 regarding payment of developer fees would apply. Thus, the Project would not result in a new impact that was not previously analyzed, and no new mitigation is required.

Libraries

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project does not include a residential component that would result in a direct increase/generation of population, such that it would result in increased demand on the existing libraries serving the City. Therefore, it is not expected that libraries within the vicinity of the Project site would be impacted by construction and operation of the Proposed Project, as a result the Project would not result in construction of new or physically altered library facilities that would result in a new significant impact. No new impacts that were not previously analyzed would occur, and no mitigation is required.

Parks and Recreation

No Substantial Change from Previous Analysis. The proposed surface parking lot is the former Sunset Field, which was acquired by the QVH to provide additional surface parking until new parking structures can be built. Despite the conversion of the former park to a proposed parking lot, as indicated in the Certified Final PEIR, the City would continue to be in compliance with the Quimby Act, with a ratio of City-owned parkland to population over 3.0 acres per 1,000 residents. The City would use the revenue from the sale of the property into the City's in-lieu park fee account to purchase parkland elsewhere in the City. Additionally, the Proposed Project does not include a residential component that would result in generation of population, and thus, would not increase demand on the existing parks and recreational uses serving the City. Therefore, it is not expected that parks and recreation facilities within the vicinity of the Proposed Project site would be impacted by construction and operation of the Proposed Project. Thus, no new significant impact that was not previously analyzed would occur, and no mitigation is required.

3.16 TRANSPORTATION

Certified Final PEIR

The Certified Final PEIR estimated that at buildout, the project would generate 9,587 total average daily trips (ADT) with 776 total AM peak hour trips and 924 total PM peak hour trips. With implementation of MMs TRA-1 through TRA-9, the Approved Project would have less than significant impacts regarding traffic impacts during all phases of construction and operation, parking, and General Plan consistency. However, even after implementing MMs TRA-1 through TRA-3, there would still be significant adverse traffic impacts at the following intersections: Merced Avenue/Sunset Avenue (ROW constraints); Cameron Avenue/Sunset Avenue (PM Peak); and West Covina Parkway/Sunset Avenue (PM Peak). These impacts required adoption of a Statement of Overriding Considerations.

The Certified Final PEIR identified that eight intersections would have significant traffic impacts that require mitigation at the end of the Approved Project buildout. However, implementation of the improvements outlined in MM TRA-1 would reduce the traffic impacts of the Approved Project after buildout to less than significant levels except for Vine Avenue/Sunset Avenue. MM TRA-3 was therefore deemed necessary to reduce traffic impacts at Vine Ave/Sunset Avenue under buildout conditions to less than significant levels.

Regarding vehicle miles traveled (VMT) analyses, at time of the Certified Final PEIR, the State Office of Planning and Research (OPR) had not yet issued formal guidelines for calculating traffic impacts for projects under CEQA using VMT instead of level of service (LOS) as a metric to determine significant impacts. Therefore, the impacts for this project were determined based on LOS.

The QVH site and immediate surrounding area do not include any roadway or other design features, which are or would produce significant traffic hazards. Therefore, the Approved Project would not have any significant impacts in this regard, and no mitigation was required. Additionally, emergency vehicle access was deemed sufficient for the existing and future needs of the hospital, and thus there would be no significant impacts in this regard, and no mitigation was deemed necessary.

As demonstrated in the Certified Final PEIR, the Approved Project was consistent with the goals and policies of PlanWC relative to alternative transportation. The Approved Project would not conflict with adopted policies regarding alternative (i.e., non-vehicular) transportation, so there would be no impacts in this regard, and no mitigation was required.

The closest airport to the QVH site is the El Monte Airport located at 4233 Santa Anita Avenue, El Monte, which is 5.1 miles northwest of the hospital property. It was determined that activities at the hospital would not influence air traffic patterns at El Monte or any other airport in the region. Impacts would be less than significant, and no mitigation was required.

Mitigation Measures

TRA-1 Prior to the issuance of building permits for improvements identified under Phase 1 of the Project, the Queen of the Valley Hospital shall make fair share contributions towards the installation of the following improvements:

- **Cameron Ave/Sunset Ave**
 - Convert the outside lane on Sunset Avenue to a shared thru-right turn lane in both directions. This will require additional striping on the downstream side of the intersection in both directions and will require that parking be prohibited on Sunset Avenue within the improvement area.
- **Merced Ave/Dalewood St/Garvey Ave**
 - Restripe the eastbound approach to include one thru lane and one exclusive right turn lane.
 - Convert the intersection to two-way stop control, with free eastbound and westbound movements.
- **Merced Ave/California Ave**
 - Restripe both approaches on Merced Avenue to include one exclusive left turn lane, one thru lane, and one shared thru-right turn lane.
- **Cameron Ave/Orange Ave**
 - Restripe both approaches on Orange Avenue to include one exclusive left turn lane and a shared thru-right turn lane.

Prior to issuance of any building permits beyond Phase 1, identified improvements at these intersections will need to be physically in place to mitigate potential impacts of Project-related traffic. This measure shall be implemented to the satisfaction of the City Engineer. **(Not Applicable)**

TRA-2 Prior to the issuance of building permits for any improvements identified under Phase 2 of the Project, the Queen of the Valley Hospital shall make a fair share contribution toward the installation of the following improvements:

- **West Covina Pkwy/I-10 WB Ramps**
 - Restripe the northwest-bound West Covina Parkway approach to include two left turn lanes, one thru lane, and a shared thru-right turn lane.

Prior to completion of construction under Phase 2, these improvements shall be physically in place to mitigate Project-related traffic impacts. This measure shall be implemented to the satisfaction of the City Engineer. **(Not Applicable)**

TRA-3 Prior to issuance of building permits for any improvements identified beyond Phase 2 of the Project, the Queen of the Valley Hospital shall make fair share contributions towards the installation of the following improvements:

- **Vine Avenue/Sunset Avenue**
 - Restripe both approaches of Sunset Avenue to include two thru lanes and a shared thru-right turn lane. This will require additional striping on the downstream side of the intersection in both directions and will require that parking be prohibited on Sunset Avenue in the improvement area.
 - Widen the project driveway across from Vine Avenue to provide two left turn lanes and a shared thru-right turn lane for traffic exiting the hospital campus.
- **West Covina Pkwy/Sunset Ave**
 - Restripe both approaches of West Covina Parkway to include two thru lanes and an exclusive right turn lane. This should only require restriping, but if needed, right-of-way is available.

Prior to certification of Project completion, these improvements shall be physically in place to mitigate Project-related traffic impacts. This measure shall be implemented to the satisfaction of the City Engineer. **(Not Applicable)**

TRA-4 Prior to the start of any major construction activity or improvement on the Project site, the Queen of the Valley Hospital shall discuss planned activities with the City and prepare a Traffic Control Plan (TCP) for City review and approval. The TCP shall provide for appropriate temporary control measures, including barricades, warning signs, speed control devices, flaggers, and other measures to mitigate potential traffic hazards and protect public safety. The TCP would also ensure coordination with emergency response providers to provide sufficient emergency response access to the Project site and to surrounding areas. This measure shall be implemented to the satisfaction of the City Engineer and City Planning Department, as appropriate. **(Applicable)**

TRA-5 Prior to completion of Phase 1 improvements, the Hospital shall document to the City that it has provided at least the following based on the Project Parking Study:

- Provide 85 parking spaces for the new/expanded Emergency Room (per parking generation rate based on the existing campus), either as surface parking or on the ground level of the nearest planned parking structure.
- Maintain existing parking spaces designated for maternal and child health center in existing location adjacent to the Family Birth & Newborn Center. **(Applicable)**

TRA-6 Prior to the start of any phase of Project improvements that contains a parking structure, the Queen of the Valley Hospital shall provide documentation as to the location, need, and appropriate size of the structure, to the satisfaction of the City Engineer and the City Planning Department. **(Not Applicable)**

TRA-7 Any parking structure constructed as part of the Project shall be opened and available for parking prior to the completion of the phase within which it is being constructed. **(Not Applicable)**

- TRA-8** During all phases of construction, signs shall be posted, and information placed on the Queen of the Valley Hospital's website on where complaints regarding parking, noise, etc. during construction should be directed. The Queen of the Valley Hospital shall make a good faith effort to resolve complaints by local neighbors regarding parking or other construction-related issues. **(Applicable)**
- TRA-9** During all phases of Project construction, the Queen of the Valley Hospital shall provide sufficient onsite or designated offsite parking for construction workers to prevent parking in adjacent residential areas. Construction workers will be given information in writing on specific parking locations they can use if offsite parking is needed. This measure shall be implemented to the satisfaction of the Planning Department. **(Applicable)**
- TRA-10** At least twice a year the Queen of the Valley Hospital shall provide printed information to its employees regarding carpooling and ridesharing. Copies of this information shall be transmitted to the City Planning Department. **(Not Applicable)**

Impact Analysis

Would the project:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

No Substantial Change from Previous Analysis. Construction of the Project would generate temporary trips associated with construction activities, which would occur in 2020 for two months. Construction-related traffic would primarily be associated with delivery of building materials and construction equipment, removal of construction debris, and construction workers commuting to/from the Project site. The maximum number of trips to occur per day would be 41 round trips/day, during the grading phase, which would occur for two weeks. Construction trips would be consistent with the analysis in the Certified Final PEIR, and MM TRA-4 regarding preparation of a Traffic Control Plan (TCP); MM TRA-8 regarding posting of signs during all phases of construction; and MM TRA-9 regarding parking for construction workers would apply.

The Proposed Project's surface parking lot is not a trip-generating land use, and would therefore not conflict with a program, plan, ordinance, or policy addressing the circulation system. The trip-generating land uses analyzed within the Certified Final PEIR required implementation of several mitigation measures, including MM TRA-5. The Proposed Project implements MM TRA-5, which requires that prior to completion of Approved Project Phase I improvements, the QVH shall provide 85 parking spaces for the new/expanded Emergency Rates, either as surface parking or on the ground level of the nearest planned parking structure. The Project would accommodate parking for the Approved Project land uses and existing uses at the QVH campus. Additionally, MM TRA-10 regarding providing information to employees about carpooling and ridesharing that would help reduce parking demand would apply. Thus, no new significant impact that was not previously analyzed would occur, and no mitigation is required.

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

No Substantial Change from Previous Analysis. Section 15064.3(b)(1) of the State CEQA Guidelines refers to evaluating transportation impacts using vehicle miles traveled (VMT) for land

use projects. The Proposed Project is would not generate any long-term change in traffic; it is not a trip-generating use and would therefore not generate VMT. The CEQA Guidelines Section 15064.3(b) states that, for many projects, a qualitative analysis of construction traffic may be appropriate. The Project is a short-term, construction-based activity. The VMT generated by the Proposed Project would occur on a short-term basis. After construction of the Project, there would be no changes to the operational trips analyzed in the Certified Final PEIR. As such, the Project would not conflict or be inconsistent with Section 15064.3(b) of the State CEQA Guidelines and would not create a significant impact pertaining to VMT, and no mitigation is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?

d) Result in inadequate emergency access?

No Substantial Change from Previous Analysis. Consistent with the analysis in the Certified Final PEIR, the Proposed Project site and immediate surrounding area do not contain any roadway or other design features, which are or would produce significant traffic hazards. Therefore, the Project would not have any significant impacts in this regard, and no mitigation is required. Additionally, consistent with the Approved Project, emergency vehicles can access the site at two points: the main hospital entrance at Sunset Avenue/Vine Street and a secondary access on Merced Avenue at the northwest corner of the site. Emergency vehicle access is also sufficient for the existing and future needs of the Project. Therefore, the Project would not create a new significant impact pertaining to incompatible uses or emergency access that was not previously analyzed in the Certified Final PEIR, and no mitigation is required.

3.17 TRIBAL CULTURAL RESOURCES

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project could potentially result in an impact to unknown tribal cultural resources. However, it was concluded that implementation of MMs CUL-1 through CUL-5 and TCR-1 through TCR-2 would reduce the impact to a less than significant level, consistent with PlanWC policies and actions.

Additionally, it was identified that there are no known historical sites within the Hospital campus or in the immediately surrounding area. Therefore, the Proposed Project would not result in any impacts on the closest historic property, located within a half mile of the Hospital campus.

Regarding archaeological resource as defined in Section 15064.5, the PEIR indicated that even though there are no known archaeological sites located within the QVH area or in the immediately surrounding area and the potential for grading to have significant impacts on archaeological resources is considered low, there is a possibility that unknown archaeological artifacts or resources would be encountered during grading. As such MMs CUL-1 through CUL-3 were proposed to reduce the impacts to less than significant level.

In terms of paleontological resources, it was indicated that according to the *PlanWC's* Resource Conservation Element, soils and geologic formations within the City, including the QVH campus, have a low potential to contain significant paleontological resources. Searches of databases identified that no fossil localities have been previously recorded within one mile of the site. Although not anticipated to be discovered, it would be possible that grading in older alluvial materials (i.e., Quaternary) could impact previously undiscovered paleontological resources. As such, MM CUL-4 was proposed to reduce the potential impact to less than significant.

Lastly, the analysis in the Certified Final PEIR indicated that if human remains are found, state law requires proper treatment for the remain in accordance with applicable regulations. Section 7050.5 of the *California Health and Safety Code* describes the protocols to be followed in the event that human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. Although there was no indication that human remains would be present, it was stated that grading would have the potential to unearth previously undiscovered human remains. As such MM CUL-5 was proposed to reduce the potential impact to less than significant level.

Mitigation Measures

- TCR-1** Prior to the start of grading for each phase of the Project, the Queen of the Valley Hospital shall enter into a Cultural Resources Monitoring Agreement with qualified Tribal representatives, and that a professional archaeological monitor meeting Secretary of Interior standards has been retained to conduct monitoring of all grading activities and has the authority to temporarily halt and redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist and Tribal representatives shall attend any pre-grading meetings with the City and contractors to explain and coordinate the requirements of the monitoring program for each phase of Project work as appropriate. **(Applicable)**

- TCR-2** During all Project-related grading activities, the City, Queen of the Valley Hospital representatives, Project Archaeologist, and the Tribal representative(s) shall be allowed to monitor and have received a minimum of 30 days advance notice of all grading and trenching activities. The Project Archaeological Monitor shall observe all mass grading and trenching activities per the Cultural Resources Monitoring Agreement. If the Tribal representatives suspect that an archaeological resource may have been unearthed, the archaeologist, in consultation with the tribal representative, shall immediately halt and redirect grading operations in a 100-foot radius around the find to allow identification and evaluation of the suspected resource. In consultation with the appropriate Native American Tribe(s), the archaeological monitor shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2. **(Applicable)**

See Cultural Resources for Mitigation Measures CUL-1 through CUL-3 and CUL-5.

Impact Analysis

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)?**

No Substantial Change from Previous Analysis. The proposed parking lot is the former Sunset Field and has been disturbed and is currently undeveloped with no structures on the site. Consistent with the Certified Final PEIR, the California Register of Historic Places (CRHP) database does not indicate any archaeological or historic resources within West Covina; however, the City has listed 31 built structures, which it considers historically significant in a survey commissioned by the City (West Covina 2019). These resources are considered eligible to be listed on the CRHP based on local significance. Of these 31 structures, one property, 1127 West Merced Avenue, is located within a half mile of the Proposed Project area. None of these structures are within or immediately adjacent to the Project site, so criteria (a) under Threshold 15.1 is not met; therefore, no new significant impacts that was not previously analyzed would occur in this regard, and no mitigation is required.

- 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.**

No Substantial Change from Previous Analysis. Consistent with the Certified Final PEIR and as discussed above in Section 3.5, Cultural Resources, the potential for the Proposed Project-related grading to have significant impacts on archaeological and paleontological resources is considered low. But the proposed construction activities could potentially disturb native soils, therefore archaeological or tribal cultural resources may be uncovered at the site. Although the likelihood of

encountering archaeological and paleontological resources in the APE is considered low, the *California Health and Safety Code* and the *California Public Resources Code* describes procedures for monitoring and protocols to be followed in the event that archaeological and/or tribal cultural resources are discovered during construction activities. As such MMs CUL-1 through CUL-3 would ensure impacts would be less than significant level.

The Certified Final PEIR stated there is no indication that human remains are present within the QVH area, although Project-related grading has the potential to unearth previously undiscovered human remains. In the unlikely event of an unanticipated encounter with human remains at the Project site, the *California Health and Safety Code* and the *California Public Resources Code* requires that any activity in the area of a potential find be halted and the Los Angeles County Coroner be notified, as described in CUL-5. This represents a potentially significant impact that requires mitigation consistent with state regulations. Therefore, MM CUL-5 is applicable to address potential impacts if human remains that were of Native American origin were found during Project grading. The Proposed Project would not result in a new significant impact that was not previously analyzed, and no new mitigation is required.

3.18 UTILITIES AND SERVICE SYSTEMS

Certified Final PEIR

The Certified Final PEIR identified that the Approved Project would incrementally increase demand for wastewater treatment services with completion of each of the four phases of the Specific Plan. Implementation of the Approved Project would comply with applicable Sanitation Districts of Los Angeles County (LACSD) requirements and would not exceed wastewater treatment requirements of the LARWQCB. Impacts would be less than significant and no mitigation required.

Additionally, it was identified that the Approved Project would require the construction of new water, recycled water, and sewer lines on site. However, no off-site improvements would be needed. Construction of infrastructure improvements within and immediately adjacent to the QVH area would result in short-term impacts related to air quality and traffic. These impacts were addressed in the Certified Final PEIR. Further, MMs UTL-1 through UTL-3 were proposed to ensure water, sewer, and landscape plans would be in compliance with applicable City municipal codes and plans.

Furthermore, it was determined that the Approved Project would not require the construction of new storm water drainage facilities or expansion of existing facilities. The storm water runoff from the Approved Project site would not exceed the capacity of the storm drain system, and no infrastructure improvements would be required beyond the installation of onsite storm drain facilities. In addition, LID and BMP systems would be implemented to ensure water quality standards and storm water runoff would not exceed capacity of the existing storm drains. Impacts would be less than significant and no mitigation required.

In addition, the analysis identified that the Approved Project's increased demand for water Would be met by Suburban Water Systems through 2040. Any future development meeting the applicable requirements would comply with the City's water conservation requirements (MMs UTL-3 and UTL-4). Thus, impacts would be less than significant with implementation of the above mitigation measures. The Approved Project would not require off-site improvements in regard to wastewater treatment. Wastewater generated by non-residential and associated uses would be treated at the San Jose Creek Water Reclamation Plant, which had available treatment capacity. Impacts would be less than significant and no mitigation required.

Further, the Approved Project would result in generation of solid waste during construction and operation. The Approved Project site would be accommodated by the Victorville Sanitary Landfill with an anticipated closure date of October 1, 2047 and available capacity for the QVH's short-term construction and demolition waste as well as on-going operational waste. Impacts would be less than significant, and no mitigation was required. Lastly, construction and operation associated with implementation the Approved Project would be conducted in compliance with applicable statutes and regulations related to solid waste, as described in the Certified Final PEIR. Implementation of MMs UTL-4 and UTL-5 would ensure impacts would be less than significant.

Mitigation Measures

- UTL-1** Water and sewer plans shall be designed and constructed to meet the applicable requirements of Suburban Water Systems and City of West Covina Municipal Code. Approval of the plans by the Suburban Water Systems shall be required prior to final map approval or issuance of permits, whichever occurs first. **(Applicable)**

- UTL-2** Landscaping associated with future development in the Queen of the Valley Hospital Specific Plan (QVHSP) area shall be implemented in compliance with Section 26-515, *Landscape Criteria*, of the City of West Covina Development Standards, which sets landscape standards and water conservation requirements. In addition, all landscape areas and irrigations systems shall be subject to the water efficiency provisions contained in Division 1, of Article XIV of Chapter 26 of the Municipal Code, and the Planning Commission Guidelines for Water Efficient Landscaping, unless otherwise exempted. and Section 26.750 of the West Covina Municipal Code includes the requirements and standards of the Model Water Efficient Landscape Ordinance or MWEL. **(Applicable)**
- UTL-3** Landscape plans prepared for future development in the QVHSP area shall be developed in compliance with Section 26.708, *Landscape Plans*, of the City of West Covina Development Code, which requires final map landscaping plans including planting design and an irrigation system to be prepared by a licensed landscape architect and submitted by the applicant for review and approval by the planning director or duly authorized representative. **(Applicable)**
- UTL-4** Demolition and construction activities during implementation of the Queen of the Valley Hospital Specific Plan shall be conducted in compliance with requirements of Chapter 7, Article XVI, *Waste Reduction, Reuse and Recycling of Construction and Demolition Debris*, of the West Covina Municipal Code, which requires diversion of construction waste into landfills for every “covered project” as set forth in section 7-261(a) and (b). Construction and demolition wastes shall be made available for deconstruction, salvage, and recovery prior to demolition. Further, demolition and construction waste requires the recycling or salvage for re-use of a minimum of 65 percent of the construction and demolition debris in compliance with State and local statutory goals and policies. Prior to permit issuance, the Project applicant shall submit a “Waste Diversion Plan” shall be submitted to the Department of Public Works. The Project Applicant may be exempt from meeting the 65 percent diversion requirement if the applicant uses the city franchised hauler/collector pursuant to section 12-17 of the West Covina Municipal Code and provides the completed documentation as required by Section 7-262 including receipts and/other documentation from the waste hauler/collector bearing the name(s) of the City of West Covina franchised hauler/collector. **(Applicable)**
- UTL-5** Development in the QVHSP area shall comply with Chapter 12, *Garbage and Rubbish Collection*, of the West Covina Municipal Code, which requires that collection and disposal of refuse, recyclables or green waste shall only be conducted by entities contracted by the City to do so (either through its own employees or through an entity under exclusive franchise with the City), as identified in the Municipal Code. In addition, the Project shall comply with Article III, *Trash Enclosure District*, of the West Covina Municipal Code, outlining the regulations pertaining to proper storage and disposal of solid waste in commercial areas of the City. **(Applicable)**

Impact Analysis

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would increase impervious surfaces by developing the existing pervious surface into an impervious parking lot and thus would contribute to runoff. However, the surface parking lot has been analyzed as part of the phased implementation of the Approved Project, which identified that only on-site, no off-site improvements would be needed in regard to the construction of new water and sewer lines. Further, the Proposed Project would not require the construction of new storm water drainage facilities or expansion of existing facilities since storm water runoff from the Approved Project site would not exceed the capacity of the storm drain system. However, new storm drain, water, and sanitary sewer lines would be constructed as part of the Proposed Project. Low Impact Development (LID) and Best Management Practice (BMP) systems would be implemented to ensure water quality standards and storm water runoff would not exceed capacity of the existing storm drains. Further, implementation of MMs UTL-1 through UTL-3 would ensure water, sewer, and landscape plans are in compliance with applicable City municipal codes and plans. Impacts for the Proposed Project would be less than significant and not more severe than what was previously analyzed, and no new mitigation is required.

Similarly, due to the nature of the Proposed Project, use of dry utilities would not be such that would result in significant impacts. As shown on Exhibit 2, Site Plan, new electrical, gas, and telephone lines would be extended to the site to accommodate operation of the proposed Project.

The Proposed Project would not result in a new significant impact to utilities and service system uses, including water, wastewater, storm water drainage, electric power, natural gas, or telecommunication facilities, and no new mitigation is required.

- b) **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple years?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project would not generate long-term potable water demands. However, the Proposed Project would require water supplies for landscaping in the surface parking lot. The Certified Final PEIR identified that Suburban Water Systems has available water supplies to meet the water demands of the QVH campus, which includes the proposed surface parking lot, through 2040. Final water plans would be designed and infrastructure installed in compliance with applicable requirements of the Suburban Water Systems, LACSD, West Covina Municipal Code, and Development Standards of the QVHSP in compliance with West Covina Development Standards (MM UTL-1). Additionally, the Proposed Project would comply with the City's water conservation requirements (MMs UTL-3 and UTL-4). Thus, impacts would be less than significant, no new impact would result that was not previously analyzed, and no new mitigation is required.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Substantial Change from Previous Analysis. The Project proposes construction of a surface parking lot on a site that is currently undeveloped. The Project would generate wastewater during construction. Due to the nature of the Project, long-term generation of wastewater during operation is not anticipated such that would require conveyance or treatment at the San Jose Creek Water Reclamation Plant. During construction, portable toilets may be required for construction workers at the construction site, and these portable toilets would be regularly cleaned and their contents disposed of offsite by an outside company. Wastewater from these portable toilets would not exceed the treatment requirements of the San Jose Creek Water Reclamation Plant, as the plant has adequate treatment capacity for the Hospital campus, according to the Certified Final PEIR. Thus, the Proposed Project would not need new or expanded treatment facilities and would not result in a new impact that was not previously analyzed. No mitigation is required.

- 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?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, the Proposed Project, the former Sunset Field is a disturbed, graded site. Development into a surface parking lot would result in generation of solid waste during construction and minimal solid waste during operation. As determined in the Certified Final PEIR, XXXX Landfill provides solid waste disposal service to the Hospital. As indicated in the analysis, the landfill has enough capacity and a closure date of October 1, 2047. Therefore, the Proposed Project's solid waste disposal needs during construction and operation would be adequately met by the landfill. Additionally, the Project would implement MMs UTL-4 and UTL-5. Impacts would be less than significant, and no additional mitigation is required.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No Substantial Change from Previous Analysis. Consistent with the findings of the Certified Final PEIR, all waste generated during construction of the Proposed Project would be handled and disposed of in compliance with all applicable federal, State, and local statutes and regulations related to solid waste. In addition, the Hospital campus operations are below the 50 percent disposal rate targets set for the City by CalRecycle and is in compliance with AB 939 and SB 1016. The Proposed Project would not conflict with statutes and regulations related to solid waste. Implementation of MMs UTL-4 and UTL-5 would ensure impacts would be less than significant and no new mitigation is required.

3.19 WILDFIRE

Certified Final PEIR

Effective December 28, 2018, the State adopted amendments to the State CEQA Guidelines requiring the analysis and mitigation of wildfire as a separate topic in draft CEQA documents. The issues of interference with an adopted emergency response or evacuations plans and exposure of people to a significant risk of loss, injury, or death involving wildfire were discussed in the Hazards and Hazardous Materials section of the PEIR.

For a summary and discussion of impacts pertaining to risk of wildfire from the Certified Final PEIR, please refer to Section 3.9, Hazards and Hazardous Materials of this document.

Mitigation Measures

No mitigation measures were required.

Impact Analysis

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?

This CEQA Memorandum has identified that the QVH campus is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2011) nor is it in a State Responsibility Area (SRA) (CAL FIRE 2019). Therefore, the Proposed Project would not have significant impacts related to emergency response plan or emergency evacuation plan, and no mitigation is required.

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?

This CEQA Memorandum has identified the QVH campus is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2011) nor is it in a State Responsibility Area (SRA) (CAL FIRE 2019). Therefore, the Proposed Project would not have significant impacts related to exacerbation of wildfire risks and associated exposure to pollutant concentrations from a wildfire or spread of wildfire, and no mitigation is required.

b) 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?

This CEQA Memorandum has identified the QVH campus is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2011) nor is it in a State Responsibility Area (SRA) (CAL FIRE 2019). Therefore, the Proposed Project would not have significant impacts pertaining to exacerbation of fire as a result of installation or maintenance of associated infrastructure, and no mitigation is required.

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?

This CEQA Memorandum has identified the QVH campus is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2011) nor is it in a State Responsibility Area (SRA) (CAL FIRE 2019). Therefore, the Proposed Project would not have significant impacts related to downslope or downstream flooding or landslides, post-fire slope instability or drainage changes, and no mitigation is required.

4.0 CONCLUSIONS

Based on the analysis provided in this CEQA Consistency Evaluation Memorandum, there is substantial evidence to determine that the Proposed Project does not represent a substantial change from the previously Approved Project evaluated in the Certified Final PEIR; no substantial changes have occurred with respect to the circumstances under which the Proposed Project is undertaken; and new information of substantial importance that was not previously known has become available that would require substantial revisions of the Certified Final PEIR. The proposed Project would not have any new or substantially more severe impacts than what was evaluated in the Certified Final PEIR. In the absence of a new significant impacts, no new mitigation measures are required.

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5.0 REFERENCES

- California Department of Forestry and Fire Protection (CAL FIRE). 2019 (June 20). California State Responsibility Areas for Fire Protection – Los Angeles, West Covina. Sacramento, CA: CALFIRE.
<https://www.arcgis.com/home/item.html?id=5ac1dae3cb2544629a845d9a19e83991>
MapView/1115 S. Sunset Avenue, West Covina, CA 91790
- .2011 (September). CAL FIRE Very High Fire Hazard Severity Zone in LRA – Los Angeles, West Covina. Sacramento, CA: CALFIRE. <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/LosAngelesCounty/WestCovina.pdf>
- Psomas. 2019 (April). *Queen of the Valley Hospital Specific Plan Zone Change No. 17-02Draft Program Environmental Impact Report SCH No. 2018101068, City of West Covina, California*. Santa Ana, CA: Psomas.
- South Coast Air Quality Management District (SCAQMD). 2019 (April). SCAQMD Air Quality Significance Thresholds. Diamond Bar, CA: SCAQMD. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.
- .2009 (March). *SCAQMD Air Quality Significance Thresholds*. Diamond Bar, CA: SCAQMD. <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>.

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Attachment A

Air Quality and Greenhouse Gas Data

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Parking Lot	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0543	1.2000e-004	0.0127	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0270	0.0270	7.0000e-005		0.0288
Unmitigated	0.0543	1.2000e-004	0.0127	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0270	0.0270	7.0000e-005		0.0288

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	9.4000e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0437					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.1900e-003	1.2000e-004	0.0127	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0270	0.0270	7.0000e-005		0.0288
Total	0.0543	1.2000e-004	0.0127	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0270	0.0270	7.0000e-005		0.0288

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	9.4000e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0437					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Landscaping	1.1900e-003	1.2000e-004	0.0127	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0270	0.0270	7.0000e-005		0.0288
Total	0.0543	1.2000e-004	0.0127	0.0000		5.0000e-005	5.0000e-005		5.0000e-005	5.0000e-005		0.0270	0.0270	7.0000e-005		0.0288

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Precise Plan for the Surface Parking Project - Los Angeles-South Coast County, Annual

Precise Plan for the Surface Parking Project

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Parking Lot	123.41	1000sqft	2.83	123,410.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - .

Land Use - Parking Lot

Construction Phase - Per Data Needs

Off-road Equipment -

Off-road Equipment - Drill rig for compact drilling equipment

Off-road Equipment - 1 grader, 1 excavator, 1 loader, 1 rubber tired dozer (bulldozer), 1 plate compactor, 1 dumper

Off-road Equipment - .

Off-road Equipment - .

Trips and VMT - .

Demolition - .

Grading - .

Energy Use -

Construction Off-road Equipment Mitigation - Tier 3 required per PEIR

Table Name	Column Name	Default Value	New Value
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	Tier	No Change	Tier 3
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tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 3
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tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstructionPhase	NumDays	10.00	5.00
tblConstructionPhase	NumDays	20.00	5.00
tblConstructionPhase	NumDays	6.00	10.00
tblConstructionPhase	NumDays	3.00	10.00
tblGrading	MaterialExported	0.00	5,300.00
tblGrading	MaterialExported	0.00	240.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0471	0.3391	0.1733	5.7000e-004	0.0721	0.0116	0.0837	0.0358	0.0107	0.0465	0.0000	53.0606	53.0606	9.4400e-003	0.0000	53.2967
Maximum	0.0471	0.3391	0.1733	5.7000e-004	0.0721	0.0116	0.0837	0.0358	0.0107	0.0465	0.0000	53.0606	53.0606	9.4400e-003	0.0000	53.2967

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					

2020	0.0322	0.2411	0.2038	5.7000e-004	0.0331	6.8300e-003	0.0399	0.0153	6.8100e-003	0.0221	0.0000	53.0606	53.0606	9.4400e-003	0.0000	53.2967
Maximum	0.0322	0.2411	0.2038	5.7000e-004	0.0331	6.8300e-003	0.0399	0.0153	6.8100e-003	0.0221	0.0000	53.0606	53.0606	9.4400e-003	0.0000	53.2967

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	31.65	28.91	-17.62	0.00	54.17	41.17	52.37	57.25	36.53	52.46	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	9-1-2020	9-30-2020	0.2364	0.1554
		Highest	0.2364	0.1554

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.8400e-003	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	13.7624	13.7624	5.7000e-004	1.2000e-004	13.8116
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	9.8400e-003	1.0000e-005	1.5900e-003	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	1.0000e-005	1.0000e-005	0.0000	13.7654	13.7654	5.8000e-004	1.2000e-004	13.8149

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.8400e-003	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	13.7624	13.7624	5.7000e-004	1.2000e-004	13.8116
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	9.8400e-003	1.0000e-005	1.5900e-003	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	1.0000e-005	1.0000e-005	0.0000	13.7654	13.7654	5.8000e-004	1.2000e-004	13.8149

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2020	9/7/2020	5	5	
2	Site Preparation	Site Preparation	9/8/2020	9/21/2020	5	10	
3	Grading	Grading	9/22/2020	10/5/2020	5	10	
4	Paving	Paving	10/6/2020	10/19/2020	5	10	
5	Architectural Coating	Architectural Coating	10/20/2020	10/26/2020	5	5	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 5

Acres of Paving: 2.83

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 7,405

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Bore/Drill Rigs	1	8.00	221	0.50
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Graders	0	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Scrapers	0	8.00	367	0.48
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Grading	Dumpers/Tenders	1	8.00	16	0.38
Grading	Excavators	1	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Plate Compactors	1	8.00	8	0.43
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	8.00	80	0.38
Paving	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	2	5.00	0.00	8.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

Worker	6.0000e-005	5.0000e-005	5.1000e-004	0.0000	1.4000e-004	0.0000	1.4000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1277	0.1277	0.0000	0.0000	0.1278
Total	1.0000e-004	1.2400e-003	7.7000e-004	0.0000	2.1000e-004	0.0000	2.1000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.4360	0.4360	2.0000e-005	0.0000	0.4366

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.3000e-004	0.0000	3.3000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.7000e-004	0.0156	0.0185	3.0000e-005		7.3000e-004	7.3000e-004		7.3000e-004	7.3000e-004	0.0000	2.7455	2.7455	8.9000e-004	0.0000	2.7677
Total	7.7000e-004	0.0156	0.0185	3.0000e-005	3.3000e-004	7.3000e-004	1.0600e-003	5.0000e-005	7.3000e-004	7.8000e-004	0.0000	2.7455	2.7455	8.9000e-004	0.0000	2.7677

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	4.0000e-005	1.1900e-003	2.6000e-004	0.0000	7.0000e-005	0.0000	7.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.3083	0.3083	2.0000e-005	0.0000	0.3089
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	5.0000e-005	5.1000e-004	0.0000	1.4000e-004	0.0000	1.4000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1277	0.1277	0.0000	0.0000	0.1278
Total	1.0000e-004	1.2400e-003	7.7000e-004	0.0000	2.1000e-004	0.0000	2.1000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.4360	0.4360	2.0000e-005	0.0000	0.4366

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0301	0.0000	0.0301	0.0166	0.0000	0.0166	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.3100e-003	0.0659	0.0306	6.0000e-005		3.3600e-003	3.3600e-003		3.0900e-003	3.0900e-003	0.0000	4.9465	4.9465	1.6000e-003	0.0000	4.9865
Total	6.3100e-003	0.0659	0.0306	6.0000e-005	0.0301	3.3600e-003	0.0335	0.0166	3.0900e-003	0.0196	0.0000	4.9465	4.9465	1.6000e-003	0.0000	4.9865

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.3000e-004	4.4500e-003	9.8000e-004	1.0000e-005	2.6000e-004	1.0000e-005	2.7000e-004	7.0000e-005	1.0000e-005	8.0000e-005	0.0000	1.1562	1.1562	8.0000e-005	0.0000	1.1582
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2000e-004	9.0000e-005	1.0300e-003	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2553	0.2553	1.0000e-005	0.0000	0.2555
Total	2.5000e-004	4.5400e-003	2.0100e-003	1.0000e-005	5.3000e-004	1.0000e-005	5.5000e-004	1.4000e-004	1.0000e-005	1.5000e-004	0.0000	1.4115	1.4115	9.0000e-005	0.0000	1.4137

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Fugitive Dust					0.0118	0.0000	0.0118	6.4600e-003	0.0000	6.4600e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.3800e-003	0.0278	0.0329	6.0000e-005		1.3000e-003	1.3000e-003		1.3000e-003	1.3000e-003	0.0000	4.9465	4.9465	1.6000e-003	0.0000	4.9865
Total	1.3800e-003	0.0278	0.0329	6.0000e-005	0.0118	1.3000e-003	0.0131	6.4600e-003	1.3000e-003	7.7600e-003	0.0000	4.9465	4.9465	1.6000e-003	0.0000	4.9865

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.3000e-004	4.4500e-003	9.8000e-004	1.0000e-005	2.6000e-004	1.0000e-005	2.7000e-004	7.0000e-005	1.0000e-005	8.0000e-005	0.0000	1.1562	1.1562	8.0000e-005	0.0000	1.1582
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2000e-004	9.0000e-005	1.0300e-003	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2553	0.2553	1.0000e-005	0.0000	0.2555
Total	2.5000e-004	4.5400e-003	2.0100e-003	1.0000e-005	5.3000e-004	1.0000e-005	5.5000e-004	1.4000e-004	1.0000e-005	1.5000e-004	0.0000	1.4115	1.4115	9.0000e-005	0.0000	1.4137

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0331	0.0000	0.0331	0.0169	0.0000	0.0169	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0105	0.1131	0.0584	1.2000e-004		5.0900e-003	5.0900e-003		4.6900e-003	4.6900e-003	0.0000	10.5631	10.5631	3.3200e-003	0.0000	10.6462
Total	0.0105	0.1131	0.0584	1.2000e-004	0.0331	5.0900e-003	0.0382	0.0169	4.6900e-003	0.0216	0.0000	10.5631	10.5631	3.3200e-003	0.0000	10.6462

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.9300e-003	0.0985	0.0217	2.6000e-004	5.7000e-003	3.1000e-004	6.0000e-003	1.5600e-003	2.9000e-004	1.8600e-003	0.0000	25.5514	25.5514	1.7800e-003	0.0000	25.5959
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.5000e-004	2.8000e-004	3.0900e-003	1.0000e-005	8.2000e-004	1.0000e-005	8.3000e-004	2.2000e-004	1.0000e-005	2.2000e-004	0.0000	0.7660	0.7660	2.0000e-005	0.0000	0.7666
Total	3.2800e-003	0.0987	0.0248	2.7000e-004	6.5200e-003	3.2000e-004	6.8300e-003	1.7800e-003	3.0000e-004	2.0800e-003	0.0000	26.3174	26.3174	1.8000e-003	0.0000	26.3625

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0129	0.0000	0.0129	6.5800e-003	0.0000	6.5800e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3900e-003	0.0594	0.0724	1.2000e-004		2.6200e-003	2.6200e-003		2.6200e-003	2.6200e-003	0.0000	10.5631	10.5631	3.3200e-003	0.0000	10.6462
Total	3.3900e-003	0.0594	0.0724	1.2000e-004	0.0129	2.6200e-003	0.0155	6.5800e-003	2.6200e-003	9.2000e-003	0.0000	10.5631	10.5631	3.3200e-003	0.0000	10.6462

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	tons/yr										MT/yr					
Hauling	2.9300e-003	0.0985	0.0217	2.6000e-004	5.7000e-003	3.1000e-004	6.0000e-003	1.5600e-003	2.9000e-004	1.8600e-003	0.0000	25.5514	25.5514	1.7800e-003	0.0000	25.5959
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.5000e-004	2.8000e-004	3.0900e-003	1.0000e-005	8.2000e-004	1.0000e-005	8.3000e-004	2.2000e-004	1.0000e-005	2.2000e-004	0.0000	0.7660	0.7660	2.0000e-005	0.0000	0.7666
Total	3.2800e-003	0.0987	0.0248	2.7000e-004	6.5200e-003	3.2000e-004	6.8300e-003	1.7800e-003	3.0000e-004	2.0800e-003	0.0000	26.3174	26.3174	1.8000e-003	0.0000	26.3625

3.5 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.6900e-003	0.0370	0.0382	6.0000e-005		1.9500e-003	1.9500e-003		1.8000e-003	1.8000e-003	0.0000	5.2362	5.2362	1.6400e-003	0.0000	5.2773
Paving	3.7100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	7.4000e-003	0.0370	0.0382	6.0000e-005		1.9500e-003	1.9500e-003		1.8000e-003	1.8000e-003	0.0000	5.2362	5.2362	1.6400e-003	0.0000	5.2773

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111

Total	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111
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Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.7000e-003	0.0301	0.0448	6.0000e-005		1.5900e-003	1.5900e-003		1.5900e-003	1.5900e-003	0.0000	5.2362	5.2362	1.6400e-003	0.0000	5.2773
Paving	3.7100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	5.4100e-003	0.0301	0.0448	6.0000e-005		1.5900e-003	1.5900e-003		1.5900e-003	1.5900e-003	0.0000	5.2362	5.2362	1.6400e-003	0.0000	5.2773

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111
Total	2.3000e-004	1.9000e-004	2.0600e-003	1.0000e-005	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.5107	0.5107	2.0000e-005	0.0000	0.5111

3.6 Architectural Coating - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0172					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.1000e-004	4.2100e-003	4.5800e-003	1.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396
Total	0.0178	4.2100e-003	4.5800e-003	1.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2000e-004	9.0000e-005	1.0300e-003	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2553	0.2553	1.0000e-005	0.0000	0.2555
Total	1.2000e-004	9.0000e-005	1.0300e-003	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2553	0.2553	1.0000e-005	0.0000	0.2555

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Archit. Coating	0.0172					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	1.5000e-004	3.3900e-003	4.5800e-003	1.0000e-005		2.4000e-004	2.4000e-004		2.4000e-004	2.4000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396
Total	0.0173	3.3900e-003	4.5800e-003	1.0000e-005		2.4000e-004	2.4000e-004		2.4000e-004	2.4000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2000e-004	9.0000e-005	1.0300e-003	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2553	0.2553	1.0000e-005	0.0000	0.2555
Total	1.2000e-004	9.0000e-005	1.0300e-003	0.0000	2.7000e-004	0.0000	2.8000e-004	7.0000e-005	0.0000	7.0000e-005	0.0000	0.2553	0.2553	1.0000e-005	0.0000	0.2555

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

[illegible]

Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	13.7624	13.7624	5.7000e-004	1.2000e-004	13.8116

Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	13.7624	13.7624	5.7000e-004	1.2000e-004	13.8116
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	43193.5	13.7624	5.7000e-004	1.2000e-004	13.8116
Total		13.7624	5.7000e-004	1.2000e-004	13.8116

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	43193.5	13.7624	5.7000e-004	1.2000e-004	13.8116
Total		13.7624	5.7000e-004	1.2000e-004	13.8116

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	9.8400e-003	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003
Unmitigated	9.8400e-003	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.7200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	7.9800e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.5000e-004	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003
Total	9.8500e-003	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003

Mitigated

[illegible]

Landscaping	1.5000e-004	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003
Total	9.8500e-003	1.0000e-005	1.5900e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.0600e-003	3.0600e-003	1.0000e-005	0.0000	3.2700e-003

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

City of West Covina
Memorandum
A G E N D A

ITEM NO. 3.

TO: Planning Commission

DATE: October 13, 2020

FROM: Planning Division

SUBJECT: SUBCOMMITTEE FOR DESIGN REVIEW NO. 20-79

APPLICANT: Jay Summers

LOCATION: 1615 Cambridge Court

REQUEST: The applicant is requesting to construct a 77-square foot entry porch and an 80 square foot deck on the front elevation of the single-family residence.

BACKGROUND:

At the September 22, 2020 Subcommittee for Design Review Meeting, the Subcommittee reviewed the proposed 77 square-foot entry porch to the existing two-story single-family residence. Staff had made a recommendation that the proposed front entry porch be reduced in height to match the existing single-story roof-line because the two-story entry porch design intensifies the mass of the two-story house, making it look out of scale with other homes in the neighborhood. Smaller entry porches help create a more human scale to the home and are encouraged.

Commissioner Jaquez opined that the proposed entry porch was too high and not in sync (harmony) with the single-family residence. Commissioner Kennedy found that the proposed design was out-of-character within the existing neighborhood. The Subcommittee agreed with staff's recommendation and directed the applicant to redesign the front entry porch by reducing its height. However, the applicant requested that the proposal be forwarded to the Planning Commission for reconsideration.

DISCUSSION:

The project involves the construction of a 17'-0" high, 77 square foot entry porch and an 80 square foot balcony along the front elevation. Balconies on the front elevation are common within this neighborhood and would not impose any potential privacy impacts. The proposed porch and balcony comply with the required front yard setbacks. Staff surveyed 19 homes within the same street on Cambridge Court to determine if there were other properties in the neighborhood with front entry porches designed similar to the project. Staff found no other properties with a front entry porch with a similar over-height design, all existing porches in the neighborhood are at the same roof-line as the first floor.

RECOMMENDATION:

Planning staff recommends that the Planning Commission direct the applicant to redesign the proposed porch so that its top ridge is no higher than the first floor roof-line.

LARGE ATTACHMENTS:

Plans are available to the public for review at West Covina City Hall. Since City Hall is currently closed to the public due to COVID 19, please contact (626) 939-8422 to make arrangements with staff to view the plans.

Submitted by: Rene Aguilar, Planning Assistant

PLANNING DEPARTMENT STAFF REPORT

SUBJECT

INITIATION OF CODE AMENDMENT NO. 20-08

GENERAL EXEMPTION

APPLICANT: City of West Covina

LOCATION: Downtown Plan Area

REQUEST: To initiate a code amendment that consist of certain changes to the West Covina Downtown Plan & Code.

BACKGROUND

The City Council adopted the Downtown Plan in conjunction with the General Plan on December 20, 2016. The Downtown Plan is a form-based code which regulates development in the Downtown (formerly central business district) area. The Downtown Plan was created during the General Plan update and multiple study sessions were held with the Planning Commission and City Council to review the standards. At the time of adoption, there was an expectation that modifications might be necessary after the first year to address any issues that were not foreseen when the Downtown Plan was reviewed and adopted. The Downtown Plan was adopted as Article XV in Chapter 26 (Zoning) of the West Covina Municipal Code.

Since the adoption of the Downtown Plan, two separate amendments have been adopted. Code Amendment No. 17-02 (Ordinance No. 2443) was adopted on August 21, 2018, and was considered a "clean-up" amendment which revised a number of items in the Code including entitlement expiration dates, list of permitted uses, building heights, allowed building types, sign standards, minor modification/minor site plan review process, wall/fence standards, and parking standards. Code Amendment No. 18-03 (Ordinance No. 2450) was adopted on December 18, 2018, which revised the commercial parking requirement calculation for the T-5 Urban Center, T-4 General Urban and T-4 Urban Neighborhood Zones to 0.65 of cumulative parking standards from the Municipal Code for non-residential uses.

DISCUSSION

On September 30, 2020, the Planning Division received a correspondence from Aaron Talarico of MLC Holdings, Inc. (Attachment No. 2) requesting that a code amendment be initiated to consider amending the West Covina Downtown Plan & Code to:

- Revise the ground floor height to reflect ground floor residential uses (from 12 feet to 10 feet)
- Allow the same area of private open space (100 square feet) on upper levels with a smaller minimum dimension of 6 feet (Code requires 8 feet)
- Reduce the minimum width of individual rowhouse units from 18 feet to 16 feet.
- Remove the maximum width requirements for stoops (maximum allowed in Code is 8 feet)

The City of West Covina Fee Schedule adopted on June 18, 2017, includes a category of “Code Amendment Proposed by Applicant”. In cases where an applicant is proposing a Code Amendment consideration, the Fee Schedule establishes a deposit of \$2,500 with final cost being the fully burdened hourly rate of staff time, actual costs (for publishing in the newspaper) and cost of City Attorney time. If it is the desire of the Planning Commission to initiate the code amendment, the \$2,500 fee would need to be paid prior to staff commencing work on the code amendment. The applicant intends to submit the Code Amendment application and fees along with other entitlement applications required to allow for the construction of a multifamily residential development at 1600 & 1616 W. Cameron Avenue.

STAFF RECOMMENDATIONS

Staff is recommending that the Planning Commission adopt a resolution initiating a code amendment to the West Covina Downtown Plan & Code.

Submitted by: Jo-Anne Burns, Planning Manager

Attachments

Attachment No. 1 - Code Amendment Initiation Resolution

Attachment No. 2 - Request Letter

ATTACHMENT NO.1

P L A N N I N G C O M M I S S I O N

R E S O L U T I O N N O .

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF WEST COVINA, CALIFORNIA, INITIATING CODE AMENDMENT NO. 20-08 RELATED TO DEVELOPMENT STANDARDS FOR THE WEST COVINA DOWNTOWN PLAN AND CODE

WHEREAS, on October 13, 2020, the Planning Commission considered the initiation of a code amendment related to development standards for the West Covina Downtown Plan and Code; and

WHEREAS, the studies and investigations made by the Planning Commission reveal the following facts:

1. The Downtown Plan and Code currently requires a 12'-0" minimum ground floor height. It is appropriate to reduce the ground-floor height for residential uses, and increase the ground floor height for mixed-use and commercial uses in order to improve urban building designs.
2. The Downtown Plan and Code currently requires a minimum 8 feet depth and width for private open space. It is appropriate to reduce the minimum depth to 6 feet without reducing the 100 square feet minimum private open space area requirement.
3. The Downtown Plan and Code currently requires the minimum width of individual rowhouse units to be 18 feet. It is appropriate to reduce the minimum width of individual rowhouse units to 16 feet in order to allow for higher density development within the Downtown Plan area.
4. The Downtown Plan and Code currently limits the width of stoops to 8 feet. It is appropriate to remove the maximum width requirement for stoops achieve more creative and better building design quality.
5. The proposed action is considered to be exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to Section 15061(b)(3) of the CEQA Guidelines, in that the proposed action consists of a code amendment, which does not have the potential for causing a significant effect on the environment.

NOW, THEREFORE, BE IT RESOLVED, the Planning Commission of the City of West Covina, in conformance with Section 26-153(a)(3) of the West Covina Municipal Code, does hereby initiate an application for a Code Amendment related to development standards within the Downtown Plan and Code.

I HEREBY CERTIFY, that the foregoing Resolution was adopted by the Planning Commission of the City of West Covina, at a regular meeting held on the 13th day of October 2020 by the following vote.

AYES:

NOES:

ABSTAIN:

ABSENT:

DATE: October 13, 2020

Sheena Heng, Chairperson
Planning Commission

Mark Persico, Secretary
Planning Commission

September 29, 2020

City of West Covina
Planning Commission
1444 West Garvey Ave. South
West Covina, CA 91790

SUBJECT: PROPOSED AMENDMENT TO THE WEST COVINA DOWNTOWN PLAN & CODE

Dear Commissioners,

MLC Holdings, Inc. respectfully requests that the Planning Commission consider an amendment to the West Covina Downtown Plan & Code. The amendment will adjust development standards to allow for the development of modern, compact townhomes within West Covina's downtown area, similar to those previously approved at the Cameron 56 community located on West Cameron Avenue. These changes include the following:

- Revise the ground floor height to reflect ground floor residential uses (10 feet versus 12 feet)
- Allow the same area of private open space (100 SF) to occur on upper levels with a smaller minimum dimension (6 feet versus 8 feet)
- Adjust the minimum width of individual rowhouse units from 18 feet to 16 feet
- Remove the maximum width requirements for stoops

Although the purpose of requesting this amendment is based upon our current application for the proposed project located at 1600-1616 West Cameron Avenue, similar exceptions were made for the Cameron 56 townhome community located next door. We are requesting an amendment because we believe these changes will also benefit the City in implementing the vision for West Covina's downtown by providing standards that allow similar projects to be built in the future. The revised standards better reflect current market conditions by allowing design features that are more desirable to buyers, conform to current building practices, and include a broader range of design solutions. Furthermore, the proposed changes still achieve the vision of the West Covina Downtown Plan & Code: To create pedestrian friendly, compact, urban development that encourages walkability.

The following provides a more detailed justification for each of the proposed changes:

Ground Floor Height — Form-based codes ("FBCs") are intended to better address the physical design of public spaces by focusing on how physical forms, such as buildings, define the public realm. This is achieved by specifying appropriate street frontages and building types that reflect the intended character of the neighborhood or "transect" as natural, rural, suburban, and varying degrees of urban. FBCs typically focus on building types and frontages that deemphasize parking by removing parking and garages from the streetscape and designing buildings that define the edges of the public street to emphasize pedestrian orientation. Although FBCs do provide development standards, the intent is to use these development standards to control the overall form at the interface between private development and the public realm, in this case West Cameron Avenue. The proposed floor height of 10 feet combined with the 18" tall stoops

along Cameron will result in a ground floor height of 11.5". The resulting height along the public street will not be discernably different from what was envisioned by the Form-based code.

Interior to the project, stoops are not provided in order to meet the requirements of the Americans with Disability Act. As such, these homes will be 10-feet at the ground level. This is also necessary to fit within the maximum height limit of 35 feet as required by the code for buildings located within 100 feet of single-family uses.

Lastly, a ground floor height of 12-feet is typical for commercial buildings, not residential homes. Residential floor heights are shorter, ranging from 8 feet to 10 feet. The proposed homes are designed to offer for-sale townhomes at prices that are attainable to first-time homebuyers and to address the regional housing crisis. Increasing the residential ground floor height to 12 feet requires more framing, which results in less efficient construction. Less efficient construction does not support environmental sustainability and adds considerable construction cost, impacting affordability.

Upper Floor Open Space — The Downtown Code's requirements for the Rowhouse building type specify a minimum open space area of 100 SF and a minimum dimension of 8'x8'. These standards are based upon the assumption that private open space will be provided on the ground floor in a rear yard. This is evident in the prototype illustrated in the FBC and by the accompanying description which states, "The primary building sits at the front of the property with the garage at the rear, separated from the primary building by a rear yard." This type of townhome is typically found in older, lower density neighborhoods. Modern, high-density townhomes are not designed this way for three reasons:

1. Buyers prefer direct access between the garage and their home. They do not want to go outside if it is raining.
2. This configuration does not use land efficiently, which results in lower densities and is contrary to the goal of compact, urban development.
3. This requires two separate structures, which is more costly and inefficient to build.

The result of this older configuration is fewer, more expensive, less desirable homes; Therefore, modern townhomes are designed with an attached garage accessed by a rear alley. This new configuration looks similar in form but requires private open space be provided either in the front, i.e. a patio, or in upper floor balconies. Since patios are not a permitted frontage and are not urban in character, balconies are required. Balconies also offer a more appropriate location for private open space, adjacent to second floor kitchens and living rooms. This location allows the private open space to act as an extension of the primary living area, providing access to outdoor dining and barbecuing without needing to navigate stairs. Furthermore, when private open spaces, such as a patio, are not connected to indoor living areas, they tend to become unsightly storage areas rather than attractive outdoor living space.

Balconies located at the front of the building add to a pedestrian friendly street. Similar to porches and stoops, balconies provide additional outdoor space along the street and encourage a more dynamic street scene with outdoor activity occurring on upper floors as well as on the ground floor. The presence of balconies also encourages safety and security for pedestrians by adding more eyes on the sidewalk.

Upper floor balconies are typically designed with smaller minimum dimensions due to constructability and cost. For this reason, most codes require a smaller minimum dimension, typically five or six feet, for upper floor balconies (Please see attached examples). Deeper balconies increase construction costs, which ultimately affect the sales price and reduce affordability. At Cameron 56, the townhome community located next door, we were given an exception on the minimum balcony dimension six feet. These balconies are usable, comfortable, and a desirable design feature. The code will still require a minimum total private open space area of 100 square feet to ensure adequate space is provided. The reduced dimension will also allow for more compact and efficient development, which supports the goals and purpose of the Downtown Plan. As an example, the currently proposed project would lose 10-15 residential units if a minimum 8-foot balcony is required.

Minimum Width of Rowhouse Units — The currently permitted width of a Rowhouse ranges from 18 feet to 36 feet. The proposed amendment would allow a range of 16 feet to 36 feet. The 16-foot dimension is a typical width for townhomes with tandem garages. Tandem garages are a key strategy to achieving higher density townhomes and higher densities are required to address the regions severe housing shortage. This reduced dimension will not have a discernable impact on the overall building form while allowing for more compact and higher density development. Furthermore, each home will still maintain an evident delineation of individual units as required by the Code.

Stoop Dimensions — The current requirement provides both minimum and maximum dimensions for stoops. While requiring a minimum makes sense to ensure usability and accessibility, limiting stoops to a maximum dimension reduces designers' ability to provide design solutions that may be superior to those currently permitted. By eliminating the maximum dimension, designers will have greater flexibility to adapt their designs to the site constraints and provide the desired pedestrian friendly streetscape envisioned by the Code.

For these reasons, we request that the Planning Commission consider the proposed changes to allow future townhome communities, similar to Cameron 56, to be built in downtown West Covina. This proposed amendment will not only benefit our project, but will support future projects that propose urban, compact development. By providing these modifications, the City will be encouraging the development envisioned by the West Covina Downtown Plan & Code.

Sincerely,



Aaron Talarico
Director of Entitlements & Forward Planning
MLC Holdings, Inc.
5 Peters Canyon Road Suite 310
Irvine, CA 92606
(949) 813-3813

Attachment 1

9/22/2020

§ 23.20.100 OPEN SPACE.

(B) *Private open space.* Private open space is devoted to the recreation and leisure use of one or more dwelling units and located immediately adjacent to such unit(s).

(1) The common open space requirement may be reduced by one square foot for each square foot of private open space that is provided, up to a maximum reduction of 50% of the open space requirement or 200 square feet per unit (150 square feet for one-bedroom or efficiency units). This reduction will be granted only if the following standards are met:

(a) Patios (cannot exceed two feet above the adjoining on-site ground, on any side) with a minimum dimension of eight feet and a minimum area of 200 square feet (150 square feet for one-bedroom or efficiency units).

(b) Decks and balconies with a minimum dimension of five feet.

Attachment 2

9/22/2020

Chapter 17.45 - MIXED/MULTIUSE ZONE | Code of Ordinances | El Monte, CA | Municode Library

- . Private Residential Open Space.
 - a. For stand-alone multi-family residential projects or as part of a mixed-use development, each residential unit shall be provided with at least one area of private open space accessible directly from the living area of the unit, in the form of a fenced yard or patio, a deck or balcony at a minimum area of one hundred fifty (150) square feet per unit for first floor units and one hundred (100) square feet per unit for upper floors.
 - b. The minimum dimension, width or depth, of a balcony shall be five (5) feet.

Attachment 3

9/22/2020

Glendora Municipal Code (Glendora, California)

Usable Open Space. Each multiple-family development shall provide a minimum of four hundred square feet of usable open space per residential unit, subject to the following standards:

- a. The usable open space may be comprised of common open space shared by more than one residential unit or private open space for the exclusive use of the residents of one unit;
- b. Common open space at the ground level shall have a minimum area of two hundred twenty-five square feet and no dimension less than fifteen feet. Private open space located at the ground level shall have a minimum area of one hundred fifty feet square feet and no dimension less than ten feet. Open space provided on a balcony or roof deck shall have a minimum area of sixty square feet and no dimension less than six feet.
- c. Private open space located at the ground level adjacent to a street shall be screened to a minimum height of five feet.
- d. Parking facilities, driveways, service areas, required setback areas abutting a street and portions of balconies or roof decks, which extend into required setback areas, are not usable open space.

Attachment 4

9/22/2020

Division III. - Condominiums | Code of Ordinances | Whittier, CA | Municode Library

Minimum Dimensions. The minimum dimension of required usable open space shall be five feet except as follows:

1. Private open space shall not be less than eight feet in any dimension and shall have a minimum area of not less than one hundred square feet except for balconies, which shall have a minimum dimension of six feet by ten feet;
2. Where open space is contiguous to a required yard, the minimum dimension shall be two feet;
3. Where a condominium faces a required side yard, that portion of the required yard in excess of five feet shall be allowed to contribute to open space.

Attachment 5

9/22/2020

Sec. .290. - "R-3" Medium density multiple-family zone. | Zoning | Pomona, CA | Municode Library

M. Open Space.

Usable open space shall be provided in two forms, private and common open space. Private open space shall be directly related to individual units. Common open space shall be dispersed throughout the development and shall be available to all residents of the development.

1. Private Open Space. "Private open space" means and is defined as usable space assigned for the exclusive use of the occupant of a specific dwelling unit.
 - a. Ground Floor Units.
 - (1) Area. One hundred square feet per unit,
 - (2) Dimensions. The minimum dimension shall be eight feet.
 - (3) Enclosure. This space shall be enclosed in a manner to define the privacy of the space;
 - b. Above Ground Floor Units.
 - (1) Area. Seventy square feet per unit in the form of terraces, balconies or rooftop patios.
 - (2) Dimensions. The minimum dimension shall be six feet.

City of West Covina
A G E N D A

ITEM NO. 5. a.

DATE: October 13, 2020

TO: Planning Commission
FROM: Planning Division
SUBJECT: Forthcoming - November 10, 2020

Attachments

10.13.20 Forthcoming

FORTHCOMING PLANNING COMMISSION HEARING

October 27, 2020

A. CONSENT CALENDAR

None

B. PUBLIC HEARINGS

None

C. NON-HEARING ITEMS

None

November 10, 2020

A. CONSENT CALENDAR

None

B. PUBLIC HEARINGS

(1)

CONDITIONAL USE PERMIT NO. 20-07

ADMINISTRATIVE USE PERMIT NO. 20-10

SUBCOMMITTEE FOR DESIGN REVIEW NO. 20-36

APPLICANT: Gerardo Limon

LOCATION: 1208 S Hollencrest Drive

REQUEST: Large Home Addition

(2)

CONDITIONAL USE PERMIT NO. 20-10

APPLICANT: Enas Farid

LOCATION: 2847 Countrywood Lane

REQUEST: Home Addition

(3)

CODE AMENDMENT NO. 19-06

APPLICANT: City Initiated

LOCATION: Citywide

REVISIONS TO THE ACCESSORY DWELLING UNIT STANDARDS

C. NON-HEARING ITEMS

None