

# **WALNUT CREEK APARTMENTS**

## **GENERAL PLAN EXEMPTION CHECKLIST PURSUANT TO CEQA GUIDELINES SECTION 15183**

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Prepared for

**CITY OF WEST COVINA**  
Planning Department  
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West Covina, CA 91790

Prepared by

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## 1.0 INTRODUCTION

This section provides an overview of the proposed Walnut Creek Apartments project (proposed project) and the organization of this California Environmental Quality Act (CEQA) document.

### 1.1 PROJECT OVERVIEW

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The proposed project consists of the demolition of an existing 95-stall surface parking lot and the construction of a 51-unit multi-family residential development with one floor of subterranean parking with 84 parking stalls underneath three stories of residential units. The 0.98-acre project site is located on Walnut Creek Parkway between Vincent Avenue and Glendora Avenue in the City of West Covina. The site is zoned for General Urban uses under the West Covina Downtown Plan and Code and has a General Plan designation of Neighborhood – High Density Residential (NH). As demonstrated in this environmental document, the proposed project satisfies CEQA requirements to qualify for a General Plan Exemption pursuant to CEQA Guidelines Section 15183.

### 1.2 PROJECT INFORMATION

---

|                                       |                                                                                                    |
|---------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>Project Title / Location:</b>      | Walnut Creek Apartments<br>3356 East Walnut Creek Parkway<br>West Covina, CA 91790                 |
| <b>Lead Agency Name / Address:</b>    | City of West Covina<br>Planning Division<br>1444 West Garvey Avenue South<br>West Covina, CA 91790 |
| <b>Contact Person / Phone Number:</b> | Jo-Anne Burns, Planning Manager<br>Phone: (626) 939-8422                                           |
| <b>Project Applicant's Name:</b>      | Charles Company<br>9034 West Sunset Boulevard<br>West Hollywood, CA 90069                          |

### 1.3 ORGANIZATION OF GENERAL PLAN EXEMPTION

---

The content and format of this environmental document is designed to meet the requirements of CEQA and is organized into the following five sections:

**1.0 Introduction.** This section provides an overview of the proposed project and the organization of this CEQA document.

**2.0 Project Description.** This section describes the project site and the surrounding area, provides a detailed description of the proposed project, and identifies an estimated timeline for the construction of the proposed project.

**3.0 CEQA Guidelines Section 15183.** This section outlines the conditions a project must satisfy to qualify for General Plan Exemption and discusses the City of West Covina's General Plan (PlanWC) and Downtown Plan and Code Environmental Impact Report (GPU EIR).

**4.0 Exemption Checklist and Evaluation.** This section contains the CEQA Guidelines Appendix G: Initial Study Checklist and includes a discussion of the environmental impacts and any mitigation measures associated with each impact category. This section presents the conclusions of the GPU EIR and discusses the applicability of the mitigation measures identified in this EIR to the proposed project.

**5.0 List of Preparers and Sources Consulted.** This section provides a list of the consultant team members that participated, and a list of sources and references used in the preparation of this environmental document.

## 2.0 PROJECT DESCRIPTION

This section describes the project site and surrounding area, provides a detailed description of the proposed project, and identifies an estimated timeline for the construction of the proposed project.

### 2.1 PROJECT LOCATION

The project site (Assessor's Identification Number [AIN] 8474-009-009) is located at 3356 East Walnut Creek Parkway in the City of West Covina. The 0.98-acre (42,672 square-feet) project site is located within the Lakes Entertainment Area district in Downtown West Covina approximately 1,000 feet south of Interstate 10 (I-10) and roughly 18 miles east of downtown Los Angeles.<sup>1</sup> The site is bounded by East Walnut Creek Parkway to the north, commercial development to the east and west, and West Covina Parkway to the south, as shown in **Figure 1**. The project site is located within the Downtown Plan Overlay Zone, zoned for General Urban uses under the West Covina Downtown Plan and Code, and designated for Neighborhood – High Density Residential (NH) uses under the West Covina General Plan.<sup>2</sup> The project site currently contains a 95-stall surface parking lot. The majority of the land uses surrounding the site are commercial and residential. Low-rise commercial retail uses, including a bank, a restaurant, a tattoo parlor, and an auto body shop are located adjacent to the project site. The West Covina Community Center is also located adjacent to the project site. A five-story multi-family apartment building is located across Walnut Creek Parkway to the north of the project site. Single-family residential uses are located approximately 500 feet to the east of the project site. The project site and surrounding land uses are presented in **Figure 2**.

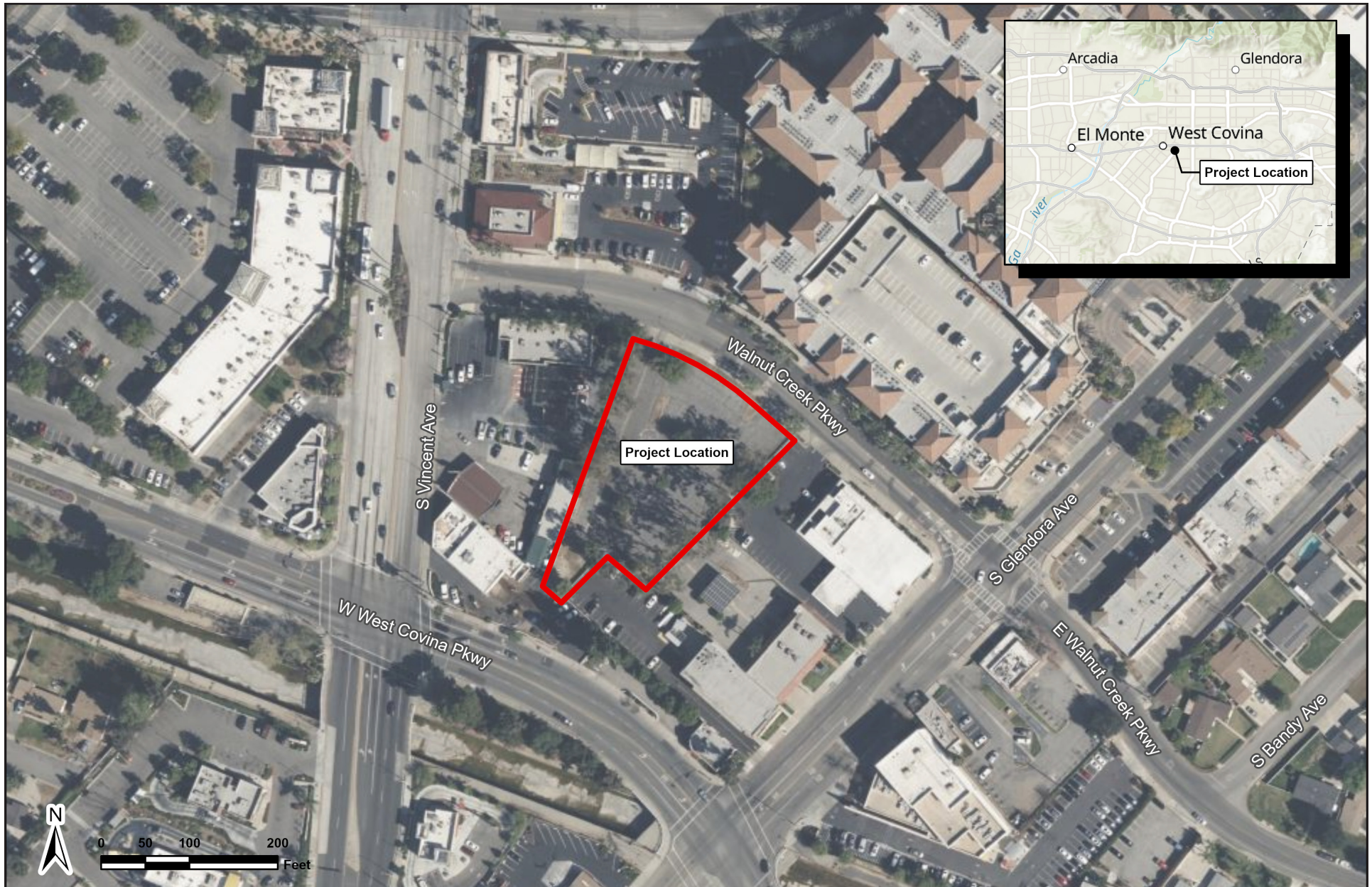
### 2.2 PROPOSED PROJECT

The proposed project includes the demolition of an existing 95-stall surface parking lot and the construction of a three-story, 51-unit multi-family residential development. The proposed project includes a unit mix of 41 one-bedroom apartments and 10 two-bedroom apartments. Units would be oriented towards the northern, western, and eastern boundaries of the project site in an hybrid court design. The U-shaped residential building would include a ground floor common space area with a courtyard/plaza, a pool and amenities space, a gymnasium, an outdoor fire pit, and a common room. The height of the building would be a maximum of 38 feet (grade to top of 3rd floor). The proposed project would incorporate conservation strategies to reduce on-site energy consumption and include the installation of high efficiency lighting fixtures to reduce lighting energy consumption by up to 20 percent and water conservation features to reduce water use by 15 percent.

The proposed project would include one level of subterranean parking for residents with a total of 84 parking stalls, including three accessible stalls, including one van stall. Vehicular ingress and egress to the subterranean parking level would be available from a proposed driveway located along Walnut Creek Parkway at the northeast corner of the project site. A seven-foot-tall white plaster finished wall would bound the entirety of the eastern, southern, and western boundaries of the property line. The project site would include terraced landscaping design features along Walnut Creek Parkway, as well as landscaping features in the interior courtyard, around the pool amenities area, and along the entirety of the seven-foot-tall wall. The site plan is provided in **Figure 3**, and floor plans and elevation drawings are shown in **Figure 4** through **Figure 8**.

<sup>1</sup>City of West Covina. *West Covina Downtown Plan & Code*. Adopted December 20, 2016.

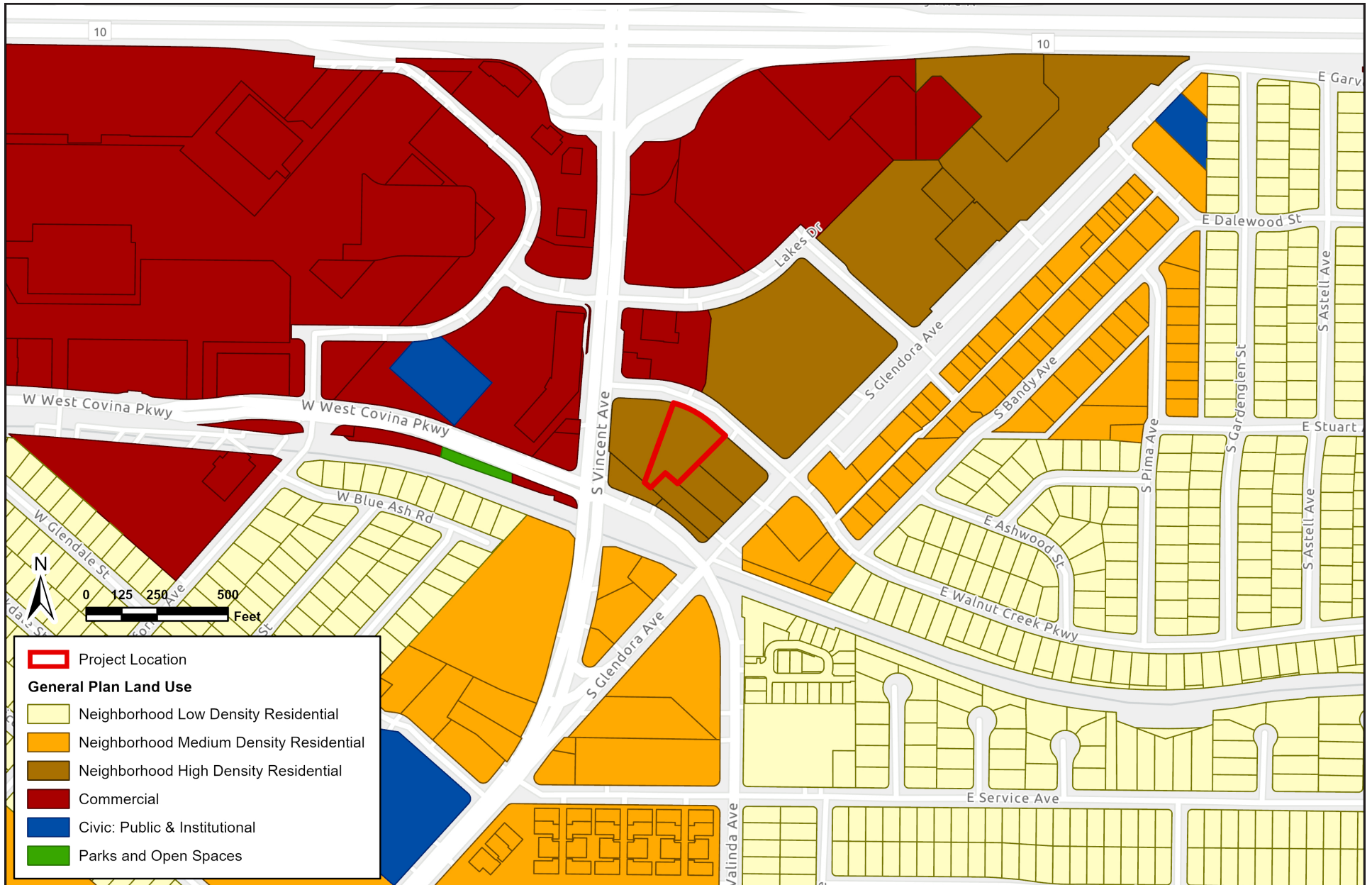
<sup>2</sup>City of West Covina. *West Covina General Plan*. Adopted December 20, 2016.



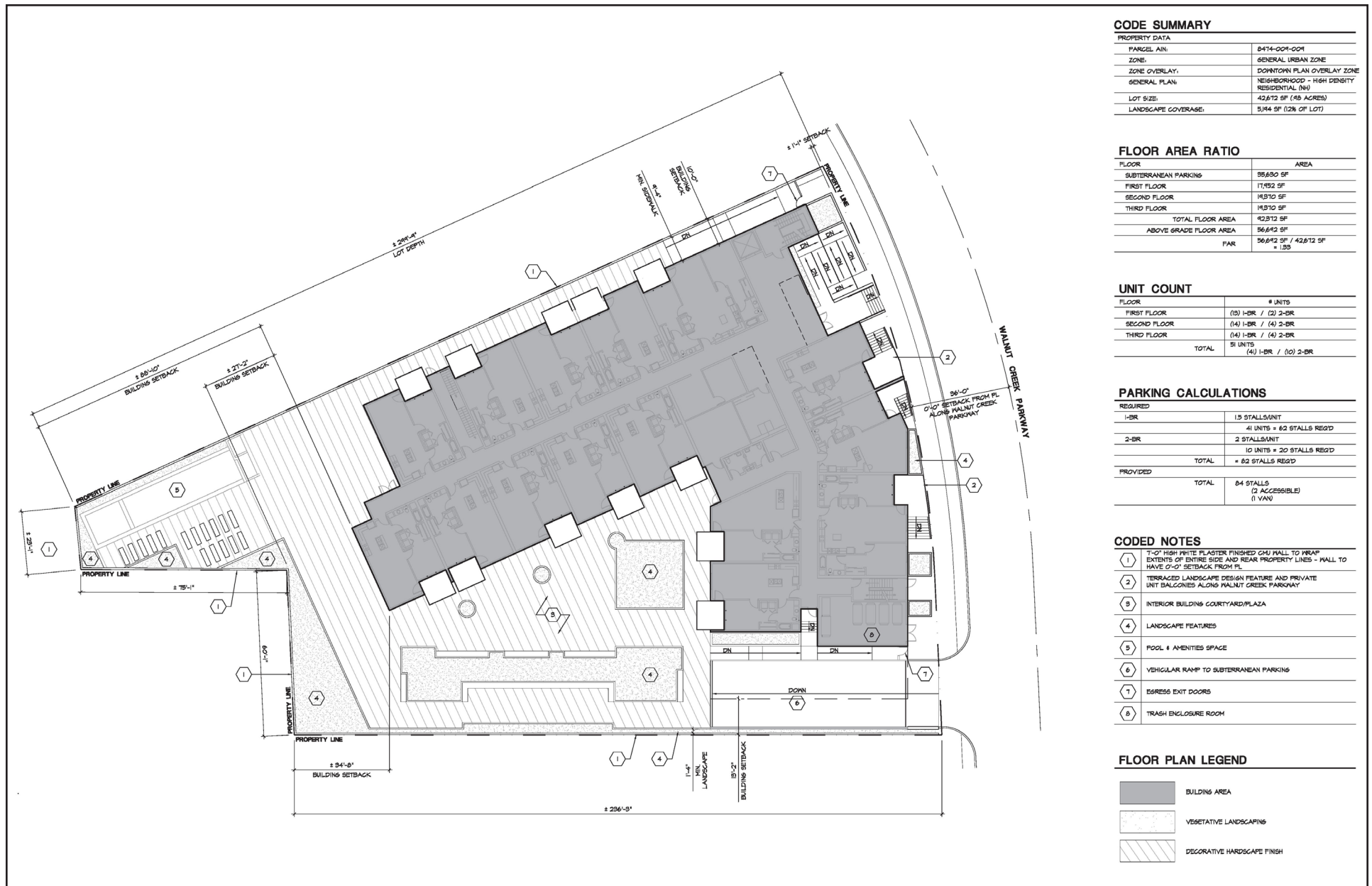
Source: TAHA, 2022.

**FIGURE 1**  
**PROJECT LOCATION**

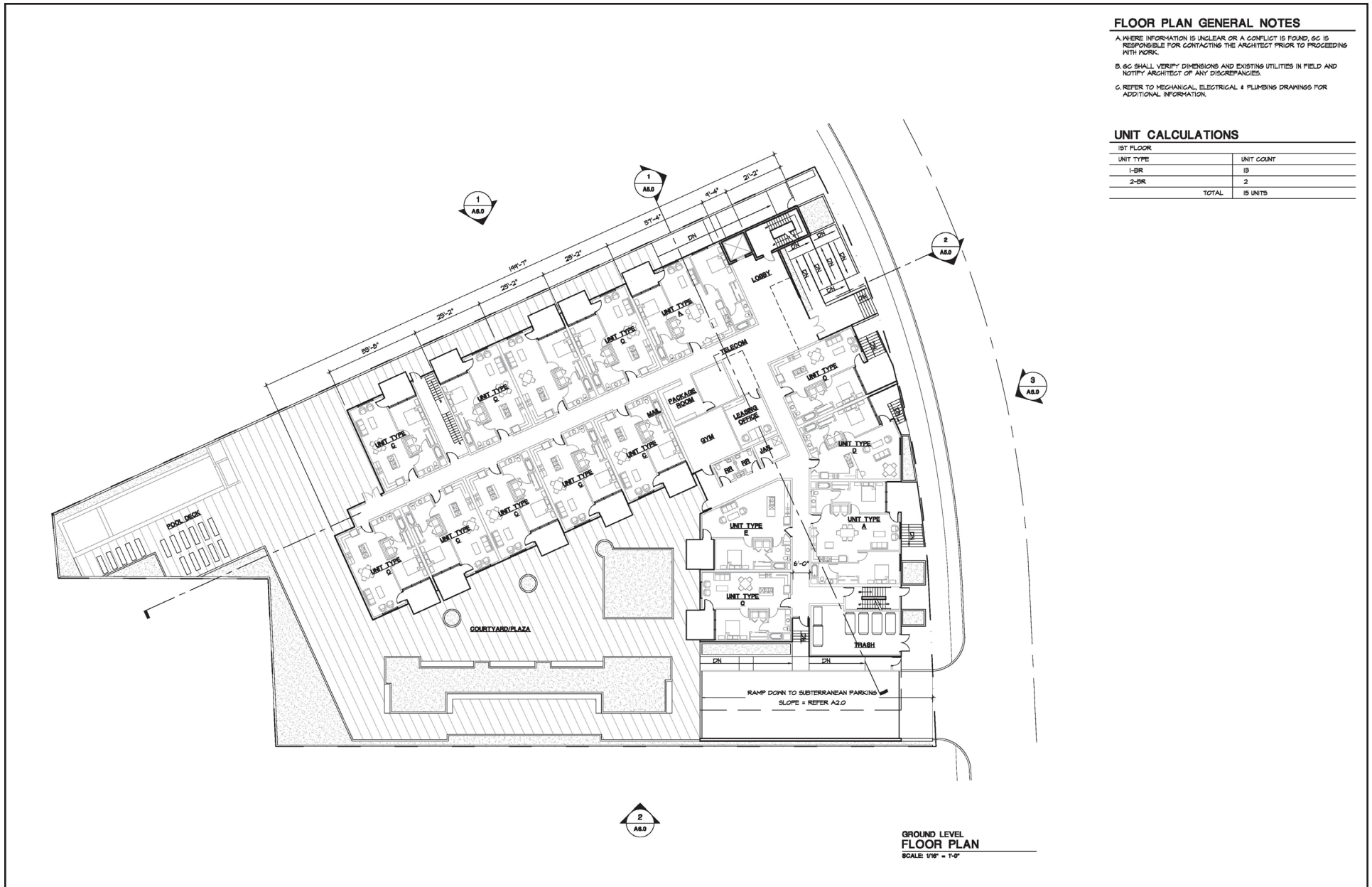




Source: SCAG, 2016; TAHA, 2022.



Source: Onyx Creative, 2023.



Source: Onyx Creative, 2023.



# FLOOR PLAN GENERAL NOTES

A. WHERE INFORMATION IS UNCLEAR OR A CONFLICT IS FOUND, GC IS RESPONSIBLE FOR CONTACTING THE ARCHITECT PRIOR TO PROCEEDING WITH WORK.

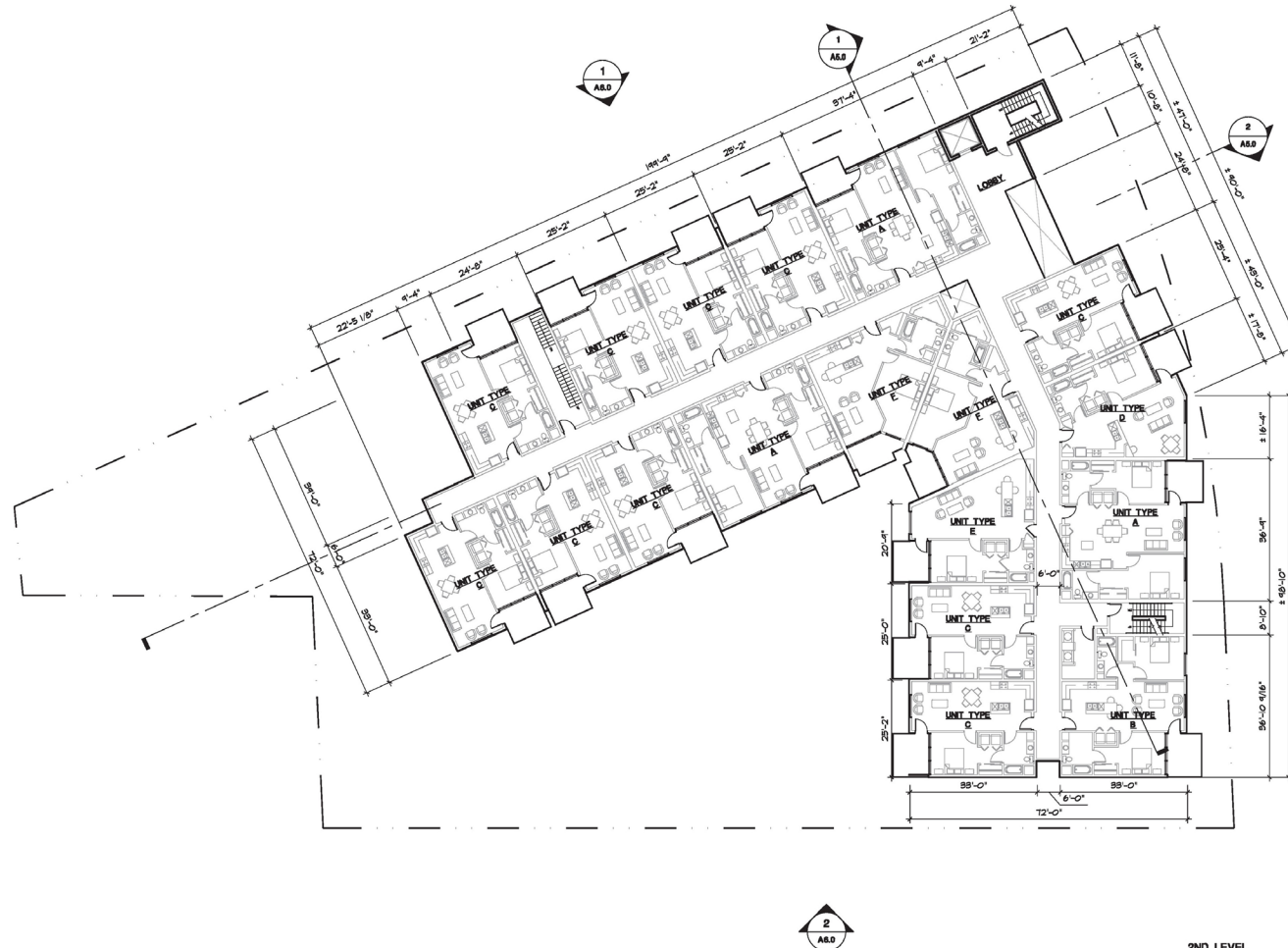
B. GC SHALL VERIFY DIMENSIONS AND EXISTING UTILITIES IN FIELD AND NOTIFY ARCHITECT OF ANY DISCREPANCIES.

C. REFER TO MECHANICAL, ELECTRICAL & PLUMBING DRAWINGS FOR ADDITIONAL INFORMATION.

D. ALL PRIVATE OPEN SPACES ARE MIN. 100 SQ. FT. AND A MIN. OF 8'X9'.

## UNIT CALCULATIONS

| 2ND FLOOR |            |
|-----------|------------|
| UNIT TYPE | UNIT COUNT |
| 1-BR      | 14         |
| 2-BR      | 4          |
| TOTAL     | 18 UNITS   |



2ND LEVEL  
FLOOR PLAN  
SCALE: 1/8" = 1'-0"

Source: Onyx Creative, 2023.

### FLOOR PLAN GENERAL NOTES

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B. GC SHALL VERIFY DIMENSIONS AND EXISTING UTILITIES IN FIELD AND NOTIFY ARCHITECT OF ANY DISCREPANCIES.

C. REFER TO MECHANICAL, ELECTRICAL & PLUMBING DRAWINGS FOR ADDITIONAL INFORMATION.

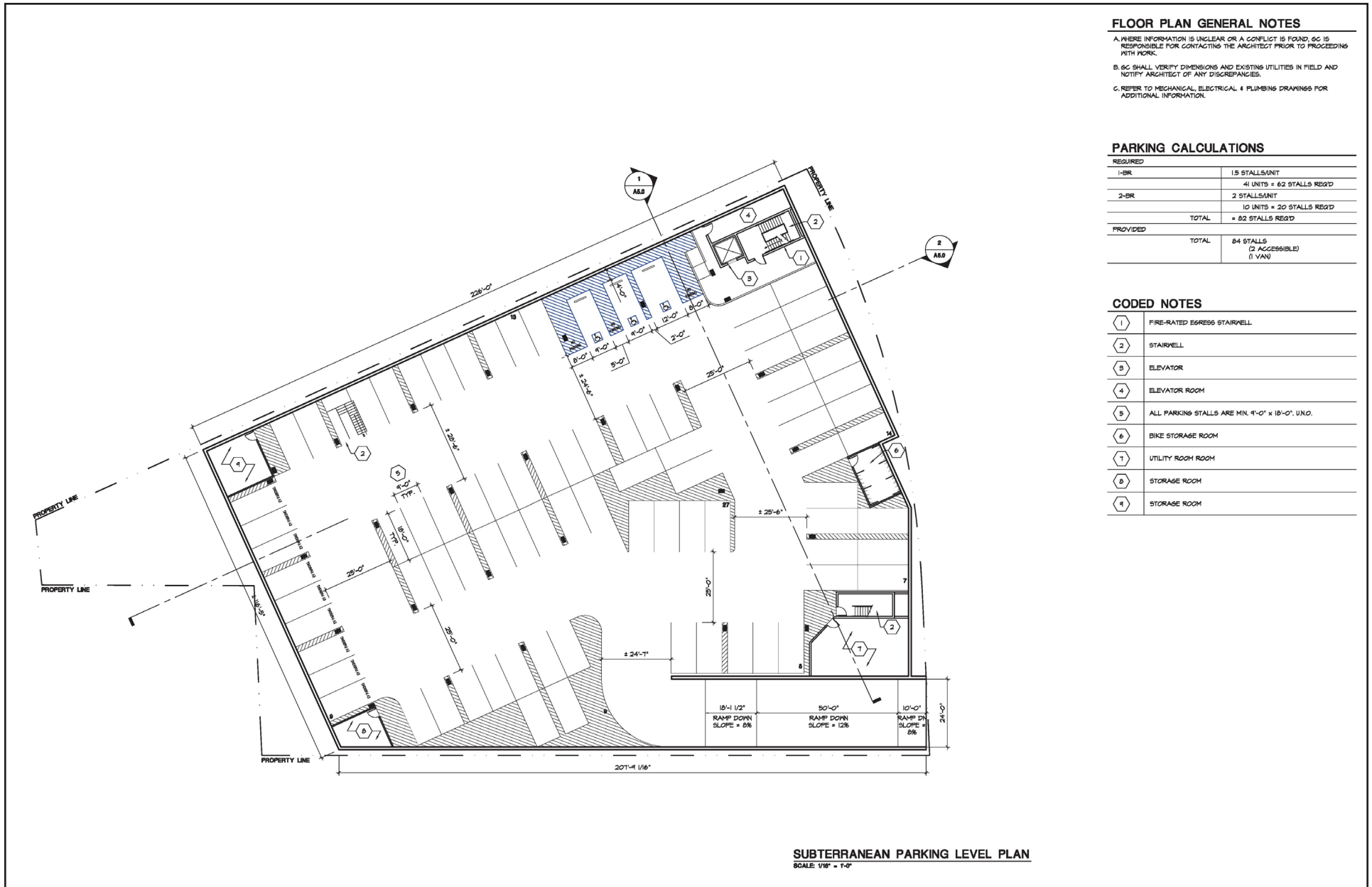
### UNIT CALCULATIONS

| 3RD FLOOR |            |
|-----------|------------|
| UNIT TYPE | UNIT COUNT |
| 1-BR      | 14         |
| 2-BR      | 4          |
| TOTAL     | 18 UNITS   |



3RD LEVEL  
FLOOR PLAN  
SCALE: 1/8" = 1'-0"

Source: Onyx Creative, 2023.



Source: Onyx Creative, 2023.



Source: Onyx Creative, 2022.

## **2.3 CONSTRUCTION ACTIVITIES AND SCHEDULE**

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Construction of the proposed project would begin in January 2024 and is anticipated to last approximately six months. Construction would consist of demolition, excavation, site preparation, grading, building construction, and paving. Construction of the subterranean parking would require approximately 15,835 cubic yards of soil to be exported from the project site. Construction activities would take place five days per week, from Monday through Friday, eight hours per day, between the hours of 7:00 a.m. through 8:00 p.m. Operation of the proposed project is expected to commence in June 2024.



## 3.0 CEQA GUIDELINES SECTION 15183

This section outlines the conditions a project must satisfy to qualify for General Plan Exemption and discusses the City of West Covina's General Plan (PlanWC) and Downtown Plan and Code Environmental Impact Report (GPU EIR).

### 3.1 GENERAL PLAN EXEMPTION REQUIREMENTS

Section 15183(d) of the CEQA Guidelines ("Projects Consistent with a Community Plan or Zoning") provides an exemption from additional environmental review for projects which meet the following conditions:

- (1) The proposed project is consistent with:
  - a. A community plan adopted as part of a general plan;
  - b. A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or
  - c. A general plan of a local agency, and
- (2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

To qualify as "consistent" with existing zoning, community plan, or general plan policies, the density of the project must be equal to or less than the standard expressed for the involved parcel(s) in the general plan for which an EIR has been certified, and the project complies with the density-related standards contained in that plan (CEQA Guidelines Section 15183(i)(2)).

The CEQA Guidelines Section 15183(c) further states that "if an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for the project solely on the basis of that impact". An impact is not peculiar if uniformly applied development standards or procedures are imposed with a finding that they will substantially mitigate the applicable environmental impact (CEQA Guidelines Section 15183(f)). Such uniformly adopted policies or procedures do not have to be addressed in the prior EIR or included in the community plan or the general plan.

The exemption applies only to the extent that all feasible mitigation measures for a significant effect specified in the EIR are or will be undertaken by the public agency having jurisdiction to implement such mitigation measures (CEQA Guidelines Section 15183(e)(1)(2)).

### 3.2 GENERAL PLAN AND DOWNTOWN PLAN AND CODE EIR

The City of West Covina prepared a Final EIR, State Clearinghouse Number 2016021069, which evaluated the environmental impacts of the City of West Covina 2016 General Plan Update and Downtown Plan and Code (GPU EIR). The Downtown Plan and Code encompasses three distinct centers: the Civic Center Area including City Hall, library, courthouse, and surrounding areas; the Plaza West Covina Area and adjacent parking structure, parking lot and surrounding buildings; and the Lakes Entertainment Area, including the movie theater, and the adjacent retail and mixed-use buildings. It identifies the need for a planning strategy to create a bigger unifying vision for

the Downtown as a place, integrate these three centers, and create a 24-7 environment for its residents. It also guides private and public investment activities within these centers. Furthermore, it articulates a compelling vision and clear and precise standards, in a form-based code, to ensure a prosperous, accessible, resilient, healthy, and inclusive future for West Covina's Downtown.<sup>3</sup>

A project is consistent with a general plan if the density of the project is the same or less than the standard contemplated for the involved parcel(s) in the general plan for which an EIR has been certified, and the project complies with the density-related standards contained in that plan. Density standards are expressed in various ways, including based on the number of dwelling units per acre, the number of people in a given area, floor area ratio (FAR), and other measures of building intensity, building height, and size limitations and use restrictions. Density standards for this area are contained in the Downtown Plan and Code, which implements the City's General Plan.

The project is consistent with the density standards contained in the Downtown Plan and Code, as analyzed in the GPU EIR, measured in dwelling units per acre. Under the Downtown Plan and Code, the allowable housing density for the project site, designated for Neighborhood – High Density Residential (NH) land uses, is 21 to 54 dwelling units per acre maximum. The proposed project would have a housing density of 52.04 dwelling units per acre. Additionally, the Downtown Plan and Code allows hybrid court building types to be constructed at a maximum of 3 stories or 40 feet in height. The multifamily building would be a maximum of 38 feet as measured from grade to the top of the third floor (48 feet to the top of the stair tower).

Based on population forecast projections by the Southern California Association of Governments (SCAG), the GPU EIR states that West Covina's population is expected to grow from 107,873 in 2016 to 116,700 by 2040. Development facilitated by the GPU EIR and implementation of the Downtown Plan and Code would result in approximately 2,100 residential units and approximately 7,161 residents by 2035.<sup>4</sup> Therefore, future residential growth facilitated by the implementation of the GPU EIR would increase the City's 2016 population of 107,873 to 115,034, which is below SCAG's 2040 population forecasts of 116,700. Based on West Covina's estimated average household size of 3.41 persons, the proposed project this would introduce 174 residents to the West Covina population for a total of 115,208 persons, which would be within the SCAG's 2012 to 2040 population projections.

Accordingly, CEQA Guidelines Section 15183 exemption applies to the proposed project because the project is consistent with the City's General Plan, the GPU EIR was certified for the West Covina General Plan, and all feasible mitigation measures identified in the GPU EIR as being applicable to the proposed project will be implemented, as further discussed in the Exemption Checklist.

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<sup>3</sup>City of West Covina. *West Covina Downtown Plan & Code*. Adopted December 20, 2016.

<sup>4</sup>*Ibid.*

## 4.0 EXEMPTION CHECKLIST AND EVALUATION

CEQA Guidelines Section 15183 Exemption Checklist provides an analysis of potential environmental impacts resulting from the project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the proposed project would result in a potentially significant impact triggering additional review under CEQA Guidelines Section 15183.

- Items checked “Peculiar Impact that is not Substantially Mitigated” indicates that the project could result in a peculiar impact, including a physical change that belongs exclusively or especially to the project or that is a distinctive characteristic of the project or the project site and that peculiar impact is not substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines Section 15183(b)(1)(f)).
- Items checked “Impact not Analyzed as Significant Effect in GPU EIR” indicates that the project could result in a significant effect that was not analyzed as significant in the GPU EIR. Such a project impact is not significant if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines Section 15183(b)(2), (c), (f)).
- Items checked “Potentially Significant Offsite or Cumulative Impact Not Discussed in GPU EIR” indicates the project could result in a significant offsite or cumulative impact that was not discussed in the GPU EIR. Such an offsite or cumulative project impact is not significant if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines Section 15183(b)(3), (c), (f)).
- Items checked “Adverse Impact More Severe Based on Substantial New Information” indicates that there is new information that leads to a determination that a project impact is more severe than discussed in the GPU EIR. Such an impact is not more severe if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (CEQA Guidelines Section 15183(b)(4), (c), (f)).

A project does not qualify for a Section 15183 exemption if it is determined that it would result in one or more of the following: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR, 2) a significant impact that was not analyzed as significant in the GPU EIR, 3) a potentially significant offsite impact or cumulative impact not discussed in the GPU EIR, or 4) a more severe impact due to substantial new information that was not known at the time the GPU EIR was certified. However, if a project having any of the foregoing impacts can be substantially mitigated through the imposition of uniformly applied development policies or standards, further environmental review is not required.

An analysis of each potential environmental effect for each subject area is provided below. The technical studies used to support the analysis are attached as appendices.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The proposed project would potentially affect the environmental factors checked below, involving at least one impact that is 1) a peculiar impact that was not identified as a significant impact under the GPU EIR, 2) a significant impact that was not analyzed as significant in the GPU EIR, 3) a potentially significant offsite impact or cumulative impact not discussed in the GPU EIR, or 4) a more severe impact due to substantial new information that was not known at the time the GPU EIR was certified, as indicated below and described in the checklist on the following pages.

- |                                                    |                                                         |                                                             |
|----------------------------------------------------|---------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture/Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources             | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions       | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation                 | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                       | <input type="checkbox"/> Mandatory Findings of Significance |

### DETERMINATION: (To be completed by the Lead Agency):

On the basis of this initial evaluation:

- ☒ I find that the proposed project WOULD NOT result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time the prior EIR. NO FURTHER ACTION is required and a Notice of Determination (Section 15094) will be filed indicating that the project IS ELIGIBLE for an EXEMPTION under CEQA Guidelines Section 15183.
- ☐ I find that the proposed project would result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time the prior EIR. I find that FURTHER ENVIRONMENTAL REVIEW is necessary to analyze those effects that are subject to CEQA, and therefore, this project is NOT ELIGIBLE for an EXEMPTION under CEQA Guidelines Section 15183.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
For

|                                                                                                                                                                                                                                                                                                                                                     | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.1 AESTHETICS.</b> <i>Would the project:</i>                                                                                                                                                                                                                                                                                                    |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Have a substantial adverse effect on a scenic vista?                                                                                                                                                                                                                                                                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?                                                                                                                                                                                            | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) 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? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                                                                                                                                                                                                               | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts to aesthetic resources on pages 49 through 77. The GPU EIR analyzes the potential for development accommodated by the GPU to result in adverse effects on scenic vistas and resources, light or glare that could adversely affect day or nighttime views, degradation of the visual character of the City or specific neighborhoods, and damage to scenic resources.

The following General Plan policy was amended and added to the GPU EIR as Mitigation Measure AES-1 to reduce project impacts to scenic vistas to a less than significant level:

- PlanWC Policy P1.9: During the review of public and private development projects, analyze potential impacts to views of natural areas from public streets, parks, trails, and community facilities.

The following policies were included in the GPU to protect scenic resources, and ensure impacts to scenic resources would be less than significant:

- PlanWC Policy P1.6: Preserve, conserve, and add to public open space.
- PlanWC Policy P1.11, Downtown Plan Policy P1.1: Plan to maximize the social, economic, and environmental benefits of trees.



The GPU EIR states that these policies and actions in the GPU and Downtown Plan would protect visual quality and character, and ensure impacts would be less than significant:

- PlanWC Policy P2.3: Focus new growth in the Downtown Area to create vibrancy and invest in key public improvements.
- PlanWC Action A2.3a: Invest in infrastructure and improve the public realm.
- PlanWC Policy P2.6: Create a diversity of housing options.
- PlanWC Action A2.6a: Support higher-intensity and high-quality multifamily development in the Downtown.
- PlanWC Policy P3.3: New growth will complete, enhance, and reinforce the form and character of the unique West Covina neighborhoods, districts, and corridors.
- PlanWC Action A3.3: Adjust regulations for the neighborhoods, districts, and corridors to reflect the nature of intended change.

The following General Plan policy was amended and added as a result of the GPU EIR to reduce project impacts associated with light and glare effects to less than significant:

- PlanWC Policy P1.10 (Included as GPU EIR Mitigation Measure AES-4): To preserve nighttime views within and immediately adjacent to single family residential zones, require property owners within and directly adjacent to these zones to utilize shielding and directional lighting methods to direct lighting away from adjoining properties.

The following action was included in the GPU to ensure project impacts associated with light and glare would be less than significant:

- PlanWC Action A1.10. Adopt development standards that prevent glare and light trespass and assess the impact of outdoor lighting during the development review process.

## Project-Specific Impacts

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

No scenic vistas are available on the project site or within the surrounding area, and the West Covina General Plan does not identify any designated scenic vistas. However, the Angeles National Forest and San Gabriel Mountains north of the City, and the San Jose Hills east of the project site, and are visible throughout West Covina. The Angeles National Forest and San Gabriel Mountains are located approximately seven miles north of the project site, while the San Jose Hills are located approximately 4.3 miles to the east. However, views of the San Gabriel Mountains and San Jose Hills are limited due to intervening buildings and existing ornamental landscaping, and construction of the proposed project would not interrupt views of these visual features. The proposed project is an in-fill development consistent with the goals of the GPU EIR and Downtown Plan. New buildings and development anticipated in the Downtown Plan areas could reduce views of scenic vistas. However, as stated in the GPU EIR, Mitigation Measure AES-1/ PlanWC Policy P1.9, along with the West Covina Municipal Code (WCMC), would preserve scenic vistas from public viewing points. The project site is relatively flat and surrounded by existing commercial and residential development that is one to five stories in height. Therefore, no impacts related to scenic vistas would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is not located on or within the vicinity of a scenic highway. The nearest state-designated scenic highway is State Route 91, which is approximately 17 miles southeast of the project site.<sup>5</sup> The project site is not within the viewshed of this scenic highway. Section 2.1, "Our Natural Community," of the City's identifies the San Jose Hills, located approximately 4.3 miles to the east of the project site and visible from Walnut Creek Parkway, as a scenic resource. The proposed project would not directly affect the San Jose Hills, or damage views of the San Jose Hills due to intervening development, distance, and relatively low elevation of these hills. Therefore, no impacts related to scenic highways would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**c) Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?**

The project site is zoned General Urban Zone and designated Neighborhood – High Density Residential (NH) under the General Plan land map. The proposed project would demolish the existing 95-stall surface parking lot and replace it with a three-story, 51-unit multi-family apartment building. The proposed project would have a housing density of 52.04 dwelling units per acre, which is consistent with the housing density standards for the Neighborhood – High Density Residential (NH) General Plan land use designation.<sup>6</sup> The proposed project would provide 1.5 parking stalls per one-bedroom unit and two parking stalls per two-bedroom unit, which is consistent with the parking requirements for the General Urban Zone.<sup>7</sup> The proposed three-story multi-family residential building would have a flat roof and a building height of 38 feet, which is within the height limits specified for the T-4 General Urban Zoning District in the Downtown Plan and Code. Additionally, the proposed project would also include terraced design landscaping along Walnut Creek Parkway. With implementation of the proposed project, the visual character and quality of the project site would be consistent with applicable zoning designations and would not degrade the existing visual quality of the project site and its surroundings. Therefore, no impacts related to visual quality would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

Due to the urban setting of the project site, a moderate level of ambient nighttime light already exists on the project site and its vicinity. Existing nighttime lighting sources within the project site and its vicinity include surface parking lot lights, streetlights, vehicle headlights, and interior and exterior building illumination. The proposed project would introduce a three-story residential building which would include windows on each floor and residential balconies. The proposed project would also provide decorative exterior lighting to illuminate walkways, paths, and general congregation areas. Light sources would be shielded so that nighttime lighting does not spillover onto adjacent properties or cause glare. The seven-feet-tall wall which would surround the western, eastern, and southern

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<sup>5</sup>California Department of Transportation. *California Scenic Highway System Map*, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed November 9, 2022.

<sup>6</sup>City of West Covina. *City of West Covina 2016 General Plan Update and Downtown Plan and Code Final EIR SCH#2016021069*. December 2016.

<sup>7</sup>*Ibid.*

property lines of the proposed project, would further reduce ground-level spillover lighting onto adjacent land uses. The proposed project would be required to comply with Section 26-570 of the City's Zoning Code, which requires that all buildings, landscaping, and parking lot lights be hooded and directed away from adjoining properties. The City has also adopted "Parking Lot and Lighting Standards" which non-residential and multi-residential developments must comply with. Additionally, the proposed project does not include features that would be a major source of glare. Implementation of PlanWC Policy 1.10 and PlanWC Action A1.10 (GPU EIR Mitigation Measure AES-4) would ensure compliance with WCMC Section 26-749.240(i) and would reduce light and glare impacts to a less than significant level. Therefore, a less-than-significant impact related to light and glare would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a less than significant level.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The GPU EIR included two mitigation measures to address impacts to Aesthetics. These mitigation measures were incorporated into GPU Policies P1.9 and P1.10. Implementation of PlanWC Policies P1.9 and P1.10 would ensure potential project-related aesthetic impacts would be less than significant. No additional mitigation measures contained in the GPU EIR apply to aesthetic impacts.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes No |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>4.2 AGRICULTURE AND FORESTRY RESOURCES.</b> <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i> |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                            |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                         |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                         |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                         |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                         |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                         |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses agricultural resources impacts on page 287. As noted therein, West Covina is an almost completely urbanized community, and no areas within the city are currently zoned, designated, or utilized for agricultural or forestry activities. According to the GPU EIR, no part of West Covina, including the project site, is designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance by the State's Farmland and Mapping Program; and no part of the City is subject to an existing Williamson Act contract.<sup>8</sup> The GPU EIR concluded that impacts

<sup>8</sup>California Department of Conservation. *California Important Farmland Finder*, <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed November 9, 2022.

associated with conversion of farmland would be less than significant, and no mitigation measures specific to agricultural impacts were required or identified.

### **Project Specific Impacts**

- a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

The project site is located in an urbanized area and is designated for regional commercial uses. The project site and its surrounding area are not zoned for agricultural use or subject to a Williamson Act Contract. No farmland, agricultural uses, or related operations are present within the project site or surrounding area. Due to its urban setting, the project site and its surroundings are not included in the Farmland Mapping and Monitoring Program of the California Department of Conservation. Therefore, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

- c) **Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**
- d) **Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

As discussed above, the project site is currently designated for regional commercial uses. It is not zoned for and would not rezone any forest land or timberland. No existing forest land or timberland is located within the project site or surrounding area. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is located in an urbanized area and is surrounded by commercial and residential uses. The project site is currently being developed with commercial uses. As discussed above, the site does not contain farmland or forest land. The proposed project would not result in the conversion of farmland to non-agricultural use or forest land into non-forest use. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Agriculture and Forestry Resources found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Agriculture and Forestry Resources.



|                                                                                                                                                                                                                                                                                             | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.3 AIR QUALITY.</b> <i>Would the project:</i>                                                                                                                                                                                                                                           |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                                                                                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                                                                                      | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?                                                                                                                                                                           | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses air quality impacts on pages 64 through 77. The GPU EIR examined a range of potential impacts related to local and regional air quality and determined that the GPU would be consistent with the adopted South Coast Air Quality Management District 2012 Air Quality Management Plan (AQMP) growth forecasts. The GPU EIR includes several goals and policies intended to reduce air emissions and improve air quality. It also includes Mitigation Measure T-1(c), which requires future projects to analyze and mitigate, if necessary, potential secondary effects of intersection-level traffic congestion. The GPU EIR finds that, with implementation of Mitigation Measure T-1(c), implementation of the GPU would not result in traffic congestion at intersections that would expose sensitive receptors to substantial pollutant concentrations. The GPU EIR concludes that impacts to air quality would be less than significant with mitigation incorporated. In addition, the following policies were included in the GPU to ensure impacts to air quality would be less than significant:

- PlanWC Policy P1.1: Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.
- PlanWC Policy P1.3: Minimize the adverse impacts of growth and development on air quality and climate.

**Air Quality Topical Information.** Air quality is typically characterized by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency (USEPA) to be of concern with respect to health and welfare of the general public. These specific pollutants, known as criteria air pollutants, are pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. These pollutants are common byproducts of human activities and have been documented through scientific research to cause adverse health effects. The federal ambient concentration criteria are known as the National Ambient Air Quality

Standards (NAAQS), and the California ambient concentration criteria are referred to as the California Ambient Air Quality Standards (CAAQS). Federal criteria air pollutants include ground-level ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), respirable particulate matter ten microns or less in diameter (PM<sub>10</sub>), fine particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>), and lead. In addition to the federal criteria pollutants, the state regulates visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Air toxics are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. Air toxics are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Air toxics include, but are not limited to, diesel PM, metals, gases absorbed by particles, and certain vapors from fuels and other sources.

**Regulatory Framework.** The Clean Air Act (CAA) governs air quality at the national level and the USEPA is responsible for enforcing the regulations provided in the CAA. As required by the CAA, NAAQS have been established for the seven criteria air pollutants described above. These pollutants are common byproducts of human activities and have been documented through scientific research to cause adverse health effects. The CAA grants the USEPA authority to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS concentrations have been met on a regional scale relying upon air monitoring data from the most recent three-year period. The NAAQS are summarized in **Table 1**.

Air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). The CCAA is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts at the regional and local levels. The CCAA requires all areas of the state to achieve and maintain the CAAQS by the earliest feasible date. The CAAQS are also summarized in **Table 1**, which also presents the attainment status designations for the Los Angeles County portion of the South Coast Air Basin (SCAB).

The 1977 Lewis Air Quality Management Act established the SCAQMD in order to coordinate air quality planning efforts throughout Southern California. The SCAQMD has jurisdiction over a total area of 10,743 square miles, consisting of the SCAB—which comprises 6,745 square miles including Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties—and the Riverside County portion of the Salton Sea and Mojave Desert Air Basins. The proposed project would be located in the City of West Covina, which is situated in the SCAB portion of Los Angeles County and is within the jurisdiction of the SCAQMD. The SCAQMD is tasked with preparing regional programs and policies designed to improve air quality within the SCAB, which are assessed and published in the form of the Air Quality Management Plan (AQMP). The current adopted publication is the 2022 AQMP, which is intended to serve as a regional blueprint for achieving the federal air quality standards and healthful healthy air.

| TABLE 1: AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS DESIGNATIONS                                                                                                                                                                                  |                         |                       |                   |                       |                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------|-------------------|-----------------------|--------------------------|
| Pollutant                                                                                                                                                                                                                                                  | Averaging Period        | California            |                   | Federal               |                          |
|                                                                                                                                                                                                                                                            |                         | Standards (CAAQS)     | Attainment Status | Standards (NAAQS)     | Attainment Status        |
| Ozone (O <sub>3</sub> )                                                                                                                                                                                                                                    | 1-Hour Average          | 0.09 ppm (180 µg/m³)  | Nonattainment     | --                    | --                       |
|                                                                                                                                                                                                                                                            | 8-Hour Average          | 0.070 ppm (137 µg/m³) | Nonattainment     | 0.070 ppm (137 µg/m³) | Nonattainment – Extreme  |
| Carbon Monoxide (CO)                                                                                                                                                                                                                                       | 1-Hour Average          | 20 ppm (23 mg/m³)     | Attainment        | 35.0 ppm (40 mg/m³)   | Attainment               |
|                                                                                                                                                                                                                                                            | 8-Hour Average          | 9.0 ppm (10 mg/m³)    | Attainment        | 9.0 ppm (10 mg/m³)    | Attainment               |
| Nitrogen Dioxide (NO <sub>2</sub> )                                                                                                                                                                                                                        | 1-Hour Average          | 0.18 ppm (338 µg/m³)  | Attainment        | 0.10 ppm (188 µg/m³)  | Attainment               |
|                                                                                                                                                                                                                                                            | Annual Arithmetic Mean  | 0.03 ppm (57 µg/m³)   | Attainment        | 0.053 ppm (100 µg/m³) | Attainment               |
| Sulfur Dioxide (SO <sub>2</sub> )                                                                                                                                                                                                                          | 1-Hour Average          | 0.25 ppm (655 µg/m³)  | Attainment        | 0.075 ppm (196 µg/m³) | Attainment               |
|                                                                                                                                                                                                                                                            | 24-Hour Average         | 0.04 ppm (105 µg/m³)  | Attainment        | 0.14 ppm (365 µg/m³)  | Attainment               |
|                                                                                                                                                                                                                                                            | Annual Arithmetic Mean  | --                    | --                | 0.030 ppm (80 µg/m³)  | Attainment               |
| Respirable Particulate Matter (PM <sub>10</sub> )                                                                                                                                                                                                          | 24-Hour Average         | 50 µg/m³              | Nonattainment     | 150 µg/m³             | Attainment (Maintenance) |
|                                                                                                                                                                                                                                                            | Annual Arithmetic Mean  | 20 µg/m³              | Nonattainment     | --                    | --                       |
| Fine Particulate Matter (PM <sub>2.5</sub> )                                                                                                                                                                                                               | 24-Hour Average         | --                    | --                | 35 µg/m³              | Nonattainment            |
|                                                                                                                                                                                                                                                            | Annual Arithmetic Mean  | 12 µg/m³              | Nonattainment     | 12.0 µg/m³            | Nonattainment            |
| Lead (Pb)                                                                                                                                                                                                                                                  | 30-day Average          | 1.5 µg/m³             | Attainment        | --                    | --                       |
|                                                                                                                                                                                                                                                            | Calendar Quarter        | --                    | --                | 1.5 µg/m³             | Unclassified/ Attainment |
|                                                                                                                                                                                                                                                            | Rolling 3-Month Average | --                    | --                | 0.15 µg/m³            | Unclassified/ Attainment |
| Sulfates                                                                                                                                                                                                                                                   | 24-Hour Average         | 25 µg/m³              | Attainment        | No Federal Standards  |                          |
| Hydrogen Sulfide                                                                                                                                                                                                                                           | 1-Hour Average          | 0.03 ppm (42 µg/m³)   | Attainment        |                       |                          |
| Vinyl Chloride                                                                                                                                                                                                                                             | 24-Hour Average         | 0.01 ppm (26 µg/m³)   | Attainment        |                       |                          |
| CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million; µg/m³ = micrograms per cubic meter.<br>SOURCE: SCAQMD, NAAQS and CAAQS Attainment Status for South Coast Air Basin, January 2023. |                         |                       |                   |                       |                          |

The SCAQMD has also established various rules to manage and improve air quality in the SCAB. The proposed project proponent would comply with all applicable SCAQMD Rules and Regulations pertaining to construction activities, including, but not limited to:

- Rule 402 (Nuisance) states that a person should not emit air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons

or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- Rule 403 (Fugitive Dust) controls fugitive dust through various requirements including, but not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, limiting vehicle speeds on unpaved roads to 15 miles per hour, and maintaining effective cover over exposed areas. Rule 403 also prohibits the release of fugitive dust emissions from any active operation, open storage piles, or disturbed surface area beyond the property line of the emission source and prohibits particulate matter deposits on public roadways.

The SCAQMD published a CEQA Air Quality Handbook to guide air quality assessments for CEQA projects within its jurisdiction.<sup>9</sup> SCAQMD methodologies recommend that air pollutant emissions be analyzed in both regional and local contexts. Regional emissions refer to all emissions that would be associated with construction and operation of a project, while localized emissions refer to only those emissions that would be produced by sources located on the project site. To assist in the assessment of air pollutant emissions under impact criteria a), b), and c) above, the SCAQMD established maximum daily threshold values for air pollutant emissions from CEQA projects within the SCAB. **Table 2** presents the SCAQMD mass daily air quality significance thresholds for regional and localized emissions of regulated pollutants resulting from construction activities.<sup>10</sup> The localized significance thresholds (LSTs) are quantitative screening values specific to SCAQMD SRA 11 applicable to a one-acre construction disturbance area within 50 meters of sensitive receptors and were obtained from the SCAQMD LST guidance document.<sup>11,12</sup> The LST values were derived from regionally-specific modeling of emissions and are designed to prevent localized pollutant concentrations from exceeding applicable ambient air quality standards at sensitive land uses near construction sites.

| TABLE 2: SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS – MASS DAILY EMISSIONS      |     |                 |     |                 |                  |                   |
|---------------------------------------------------------------------------------|-----|-----------------|-----|-----------------|------------------|-------------------|
| Pollutant                                                                       | VOC | NO <sub>x</sub> | CO  | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| <b>CONSTRUCTION</b>                                                             |     |                 |     |                 |                  |                   |
| Regional Threshold (lbs./day)                                                   | 75  | 100             | 550 | 150             | 150              | 55                |
| Localized Threshold (lbs./day)                                                  | --  | 84              | 760 | --              | 13               | 5                 |
| <b>OPERATIONS</b>                                                               |     |                 |     |                 |                  |                   |
| Regional Threshold (lbs./day)                                                   | 55  | 55              | 550 | 150             | 150              | 55                |
| Localized Threshold (lbs./day)                                                  | --  | 84              | 760 | --              | 4                | 2                 |
| <b>Note:</b> lbs./day = pounds per day<br><b>SOURCE:</b> SCAQMD, 2009 and 2023. |     |                 |     |                 |                  |                   |

**Existing Setting.** Air quality within the SCAB region is characterized by concentrations of air pollutants measured at 37 monitoring stations located throughout the SCAQMD jurisdiction. The SCAB is divided geographically into 38 source receptors areas (SRAs), each of which contains an air quality monitoring station excluding SRA 7. The SRA boundaries were drawn based on proximity to the nearest air monitoring station, the local emission inventories, and surrounding

<sup>9</sup>SCAQMD. *CEQA Air Quality Handbook (Version 3)*. Revised 2001.

<sup>10</sup>SCAQMD. *SCAQMD Air Quality Significance Thresholds – Mass Daily Thresholds*. March 2015.

<sup>11</sup>SCAQMD. *Final Localized Significance Threshold Methodology Appendix C Mass Rate Lookup Tables*. October 21, 2009.

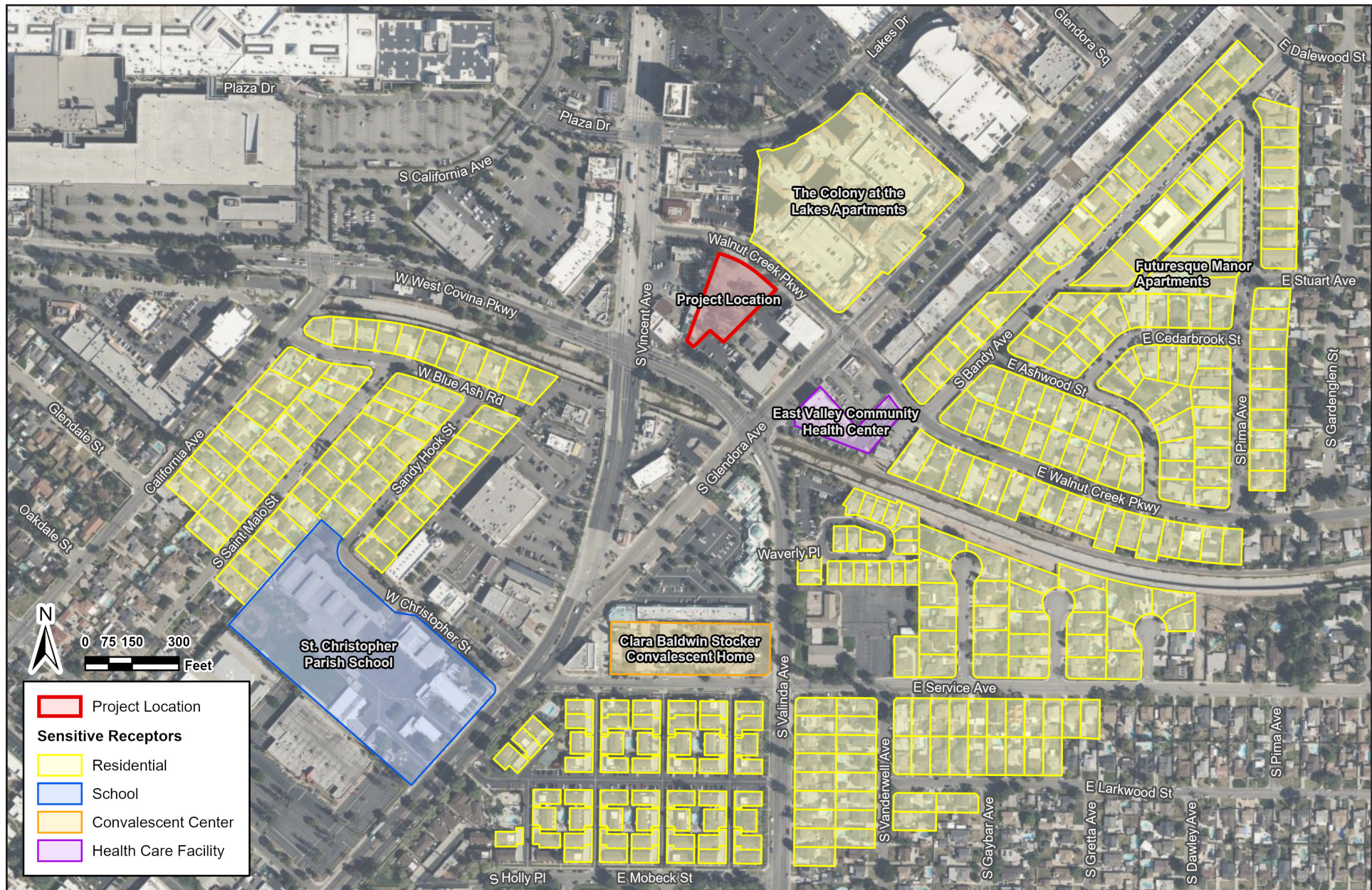
<sup>12</sup>SCAQMD. *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*. 2008.

topography. The proposed project is in SRA 11 (South San Gabriel Valley). The monitoring station that collects ambient air quality data in SRA 11 is the Azusa Monitoring Station located at 803 North Loren Avenue in the City of Azusa. Ambient concentrations of O<sub>3</sub> and PM<sub>2.5</sub> exceeded the associated NAAQS and CAAQS numerous times over the last five years in. The data demonstrate the ongoing challenges that the region faces with regards to improving air quality and bringing the SCAB into attainment of the federal and state standards.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The CARB has identified the following groups who are most likely to experience adverse health effects due to exposure to air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, land uses that constitute sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The SCAQMD has established 500 meters (1,640 feet) as the distance for assessing localized air quality impacts. **Table 3** and **Figure 9** shows sensitive receptors within 500 meters of the project site.

| <b>TABLE 3: SENSITIVE RECEPTORS</b>             |                                          |
|-------------------------------------------------|------------------------------------------|
| <b>Sensitive Receptor</b>                       | <b>Distance from Project Site (Feet)</b> |
| The Colony at the Lakes Apartments              | 70                                       |
| East Valley Community Health Center             | 325                                      |
| Residences along Blue Ash Road                  | 510                                      |
| Residences along Bandy Ave.                     | 535                                      |
| Residences along E. Walnut Creek Pkwy.          | 650                                      |
| Residences along Ashwood St.                    | 730                                      |
| Residences along Sandy Hook St.                 | 795                                      |
| Clara Baldwin Stocker Convalescent Home         | 885                                      |
| Residences along Cedarbrook St.                 | 955                                      |
| Residences along St. Malo St.                   | 1065                                     |
| Residences between Service Ave. and Molbeck St. | 1145                                     |
| Futuresque Manor Apartments                     | 1250                                     |
| St. Christopher Parish School                   | 1310                                     |
| Residences along Pima Ave.                      | 1400                                     |
| <b>SOURCE:</b> TAHA, 2023.                      |                                          |





Source: TAHA, 2023.



## Project-Specific Impacts

The Air Quality Calculations conducted for the proposed project are included in Appendix A.

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

The GPU EIR determined that land use development under PlanWC would be consistent with the AQMP. Impacts were determined to be less than significant with adherence to applicable PlanWC policies and AQMP control measures. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to consistency with the AQMP.

The GPU EIR assessed consistency with the AQMP growth forecasts and AQMP control measures. Regarding consistency with the AQMP growth forecasts, the proposed project involves the construction of 51 units, which would cause a direct increase in the City's population. Based on West Covina's estimated average household size of 3.41 persons as stated in the GPU EIR, this would lead to an increase of approximately 174 residents. Based on the GPU EIR's growth projections of 7,161 persons between 2012 to 2016, the 174 new residents accommodated by the project would account for 2.4 percent of this projected population increase. Therefore, the proposed project would result in a citywide population of approximately 115,208 persons. The increase in population associated with the project would be within the SCAG's 2012 to 2040 population projections.

Regarding consistency with the AQMP control measures, the proposed project is a common in-fill residential development. There is no potential for such development to interfere with the AQMP control measures designed to reduce regional pollutant emissions. The proposed project is an infill development located within 0.5 miles of a Transit Priority Areas (TPA) route near downtown West Covina. The project site is well served by bus transit lines operated by Foothill Transit, and a major transit center is located at the Plaza at West Covina. A bus stop is located on Vincent Avenue, approximately 320 feet to the northwest of the project site. In addition, the City of West Covina operates local transit service (Go West Shuttle), which stops near the project site on Lakes Drive. In addition, the proposed project would incorporate conservation strategies to reduce on-site energy consumption and include the installation of high efficiency lighting fixtures to reduce lighting energy consumption by up to 20 percent and water conservation features to reduce water use by 15 percent. These features would ensure that the proposed project would be consistent with the AQMP intention of reducing regional emissions through emission control measures. Therefore, the proposed project would not conflict with the AQMP control measures.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to consistency with the AQMP. The proposed project would not result in a peculiar impact related to consistency with the AQMP that was not assessed in the GPU EIR. No new mitigation measures are needed to ensure consistency with the AQMP. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.



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

The GPU EIR determined that development under PlanWC would not generate emissions that would contribute to an air quality violation or result in a cumulatively considerable net increase of any criteria pollutant. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to air pollutant emissions.

**Construction Emissions.** Construction of the proposed project would begin in January 2024 and is anticipated to last approximately six months. Construction would consist of demolition, excavation, site preparation, grading, building construction, and paving. Construction activities would take place a five day per week, from Monday through Friday, eight hours per day, between the hours of 7:00 a.m. through 8:00 p.m. Construction of the subterranean parking would require approximately 15,835 cubic yards of soil to be exported from the project site.

Construction emissions are estimated using the latest California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3). Emission factors applicable to the Los Angeles County portion of the SCAB were used in conjunction with conservative estimates of equipment activity, worker trips, fugitive dust generation, and material hauling trips to estimate maximum daily emissions during each construction phase. Construction emissions were estimated using detailed equipment inventories and construction scheduling information provided by the engineering team combined with emissions factors from the EMFAC and OFFROAD models that are built into the CalEEMod program.

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips by construction workers and haul trucks traveling to and from the project site. Fugitive dust emissions would primarily result from site preparation (e.g., demolition and grading) activities. NO<sub>x</sub> emissions would predominantly result from the use of construction equipment and haul truck trips. The assessment of construction air quality impacts considers all of these emissions sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. It is mandatory for all construction projects in the SCAB to comply with SCAQMD Rule 403 for Fugitive Dust.

Rule 403 control requirements include best management practices to prevent the generation of visible dust plumes. Best management practices include, but are not limited to, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with the provisions and best management practices propagated by Rule 403—such as the application of water as a dust suppressant to exposed stockpiles and disturbed ground surfaces—would reduce regional fugitive dust PM<sub>10</sub> and PM<sub>2.5</sub> emissions associated with construction activities by approximately 61 percent.

**Table 4** shows the maximum unmitigated daily emissions that would be generated by sources involved in construction for each activity, differentiated by source location either on-site or off-site to facilitate the analysis of both regional and localized emissions. Maximum daily emissions of all air pollutants would remain below all applicable regional SCAQMD thresholds, and air quality impacts would be less than significant.

| <b>TABLE 4: ESTIMATED DAILY CONSTRUCTION EMISSIONS</b>      |                                  |                 |             |                 |                  |                   |
|-------------------------------------------------------------|----------------------------------|-----------------|-------------|-----------------|------------------|-------------------|
| Phase                                                       | Daily Emissions (Pounds Per Day) |                 |             |                 |                  |                   |
|                                                             | VOC                              | NO <sub>x</sub> | CO          | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| <b>DEMOLITION</b>                                           |                                  |                 |             |                 |                  |                   |
| On-Site Emissions                                           | 0.6                              | 5.3             | 6.8         | <0.1            | 0.5              | 0.4               |
| Off-Site Emissions                                          | 0.1                              | 1.0             | 0.8         | <0.1            | 0.3              | 0.1               |
| <b>Total</b>                                                | <b>0.6</b>                       | <b>6.2</b>      | <b>7.6</b>  | <b>&lt;0.1</b>  | <b>0.8</b>       | <b>0.4</b>        |
| <b>SITE PREPARATION</b>                                     |                                  |                 |             |                 |                  |                   |
| On-Site Emissions                                           | 0.5                              | 3.9             | 6.1         | <0.1            | 0.2              | 0.2               |
| Off-Site Emissions                                          | 0.2                              | 10.0            | 4.0         | <0.1            | 2.2              | 0.7               |
| <b>Total</b>                                                | <b>0.6</b>                       | <b>13.8</b>     | <b>10.1</b> | <b>&lt;0.1</b>  | <b>2.4</b>       | <b>0.8</b>        |
| <b>BUILDING CONSTRUCTION</b>                                |                                  |                 |             |                 |                  |                   |
| On-Site Emissions                                           | 0.6                              | 5.2             | 6.8         | <0.1            | 0.2              | 0.2               |
| Off-Site Emissions                                          | 0.2                              | 0.3             | 2.1         | <0.1            | 0.4              | 0.1               |
| <b>Total</b>                                                | <b>0.8</b>                       | <b>5.5</b>      | <b>8.9</b>  | <b>&lt;0.1</b>  | <b>0.6</b>       | <b>0.3</b>        |
| <b>ARCHITECTURAL COATING</b>                                |                                  |                 |             |                 |                  |                   |
| On-Site Emissions                                           | 9.2                              | 1.8             | 2.3         | <0.1            | 0.1              | 0.1               |
| Off-Site Emissions                                          | 0.0                              | 0.0             | 0.4         | <0.1            | 0.1              | 0.0               |
| <b>Total</b>                                                | <b>9.2</b>                       | <b>1.9</b>      | <b>2.7</b>  | <b>&lt;0.1</b>  | <b>0.1</b>       | <b>0.1</b>        |
| <b>REGIONAL ANALYSIS</b>                                    |                                  |                 |             |                 |                  |                   |
| Maximum Regional Daily Emissions                            | <b>9.2</b>                       | <b>14.5</b>     | <b>12.4</b> | <b>&lt;0.1</b>  | <b>2.6</b>       | <b>0.9</b>        |
| Regional Significance Threshold                             | 75                               | 100             | 550         | 150             | 150              | 55                |
| Exceed Regional Threshold?                                  | <b>No</b>                        | <b>No</b>       | <b>No</b>   | <b>No</b>       | <b>No</b>        | <b>No</b>         |
| <b>LOCALIZED ANALYSIS</b>                                   |                                  |                 |             |                 |                  |                   |
| Maximum Localized Daily Emissions                           | --                               | <b>9.9</b>      | <b>10.3</b> | --              | <b>2.1</b>       | <b>0.7</b>        |
| Localized Significance Threshold                            | --                               | 84              | 760         | --              | 13               | 5                 |
| Exceed Localized Threshold?                                 | --                               | <b>No</b>       | <b>No</b>   | --              | <b>No</b>        | <b>No</b>         |
| <b>Note:</b> Numbers may not add precisely due to rounding. |                                  |                 |             |                 |                  |                   |
| <b>SOURCE:</b> TAHA, 2023.                                  |                                  |                 |             |                 |                  |                   |

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to construction emissions. The proposed project would not result in a peculiar construction emissions impact related to that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce construction emissions. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

**Operational Emissions.** CalEEMod was also used to produce estimates of daily air pollutant emissions during future operation. The proposed project would generate 344 daily vehicle trips. Direct sources of operational emissions would include mobile source vehicle trips and area source emissions such as consumer product use (i.e., household cleaners) and landscaping activities. Indirect source emissions during

operations would include energy consumption such as natural gas use associated with space heating, water heating, and stoves, as well as electricity for lighting and appliances.

**Table 5** shows the maximum unmitigated daily emissions that would be generated by operational activities. Maximum daily emissions of all air pollutants would remain below all applicable regional SCAQMD thresholds, and air quality impacts would be less than significant.

| <b>TABLE 5: ESTIMATED DAILY EMISSIONS – OPERATIONS</b>                                    |                           |                 |             |                 |                  |                   |
|-------------------------------------------------------------------------------------------|---------------------------|-----------------|-------------|-----------------|------------------|-------------------|
| Operational Emissions Source                                                              | Daily Emissions (lbs/day) |                 |             |                 |                  |                   |
|                                                                                           | VOC                       | NO <sub>x</sub> | CO          | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Area Sources                                                                              | 1.2                       | 1.0             | 10.9        | <0.1            | 0.9              | 0.2               |
| Energy Sources                                                                            | 1.3                       | 0.1             | 2.9         | <0.1            | <0.1             | <0.1              |
| Mobile Sources                                                                            | <0.1                      | 0.1             | 0.1         | <0.1            | <0.1             | <0.1              |
| <b>REGIONAL ANALYSIS</b>                                                                  |                           |                 |             |                 |                  |                   |
| <b>Daily Operational Emissions</b>                                                        | <b>2.5</b>                | <b>1.1</b>      | <b>13.8</b> | <b>&lt;0.1</b>  | <b>0.9</b>       | <b>0.2</b>        |
| Regional Threshold                                                                        | 55                        | 55              | 550         | 150             | 150              | 55                |
| <b>Exceed Threshold?</b>                                                                  | <b>No</b>                 | <b>No</b>       | <b>No</b>   | <b>No</b>       | <b>No</b>        | <b>No</b>         |
| <b>Note:</b> Numbers may not add precisely due to rounding.<br><b>SOURCE:</b> TAHA, 2023. |                           |                 |             |                 |                  |                   |

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to operational emissions. The proposed project would not result in a peculiar operational emissions impact related to that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce operational emissions. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

**Cumulative Emissions.** The SCAB is currently designated nonattainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under the State standards and nonattainment for O<sub>3</sub> and PM<sub>2.5</sub> under the federal standards. Therefore, a project may result in a cumulatively considerable air quality impact under this criterion if daily emissions of ozone precursors (VOC and NO<sub>x</sub>) or particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) exceed applicable air quality thresholds of significance established by the SCAQMD. The SCAQMD designed the significance thresholds to prevent projects from exceeding the ambient air quality standards and potentially resulting in air quality violations. The SCAQMD suggests that if any quantitative air quality significance threshold is exceeded by an individual project during construction activities or operation, that project is considered cumulatively considerable and would be required to implement effective and feasible mitigation measures to reduce air quality impacts.

Conversely, the SCAQMD propagates the guidance that if an individual project would not exceed the regional mass daily thresholds, then it is generally not considered to be cumulatively significant. This method of impact determination allows for the screening of individual projects that would not represent substantial new sources of emissions in the SCAB; it also serves to exclude smaller projects from the responsibility of identifying potentially concurrent new or proposed construction and operation emissions nearby since the incremental contribution to regional emissions is minor. As shown in **Table 4** and **Table 5** above, implementation of the proposed project would not exceed any applicable SCAQMD regional mass daily thresholds during construction or operation. Therefore, the

proposed project would not generate cumulatively considerable emissions of ozone precursors or particulate matter and impacts would be less than significant.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to cumulative emissions. The proposed project would not result in a peculiar cumulative emissions impact related to that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce cumulative emissions. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

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

The GPU EIR acknowledged the potential for substantial pollutant concentrations. Impacts were determined to be less than significant with implementation of Mitigation Measure T-1(c) requiring future projects to analyze and mitigate, if necessary, potential secondary effects of intersection-level traffic congestion, the proposed project would not result in traffic congestion at intersections that would expose sensitive receptors to substantial pollutant concentrations. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to substantial pollutant concentrations.

The use of heavy-duty construction equipment and haul trucks during construction activities would release diesel PM to the atmosphere through exhaust emissions. Diesel PM is a known carcinogen, and extended exposure to elevated concentrations of diesel PM can increase excess cancer risks in individuals. However, carcinogenic risks are typically assessed over timescales of several years to decades, as the carcinogenic dose response is cumulative in nature. Short-term exposures to diesel PM would have to involve extremely high concentrations in order to exceed the SCAQMD air quality significance threshold of 10 excess cancers per million. Construction of the proposed project is forecasted to last for approximately six months. It is unlikely that diesel PM concentrations would be of any public health concern during the construction period, and diesel PM emissions would cease upon completion of construction activities. Therefore, the proposed project would result in a less-than-significant impact related to construction toxic air contaminants emissions.

The SCAQMD recommends that a health risk assessment be conducted for substantial sources of diesel PM emissions (e.g., truck stops and distribution facilities). The proposed project is not one that would generate a substantial number of heavy-duty truck trips within the region, such as a distribution warehouse. It is not anticipated that the proposed project would generate significant truck trips and no other sources of operational air toxic emissions have been identified at the project site. Therefore, the proposed project would not result in an impact related to operational pollutants.

Mitigation Measure T-1(c) requires that future projects of 100 units or more analyze their potential traffic impacts, including secondary impacts such as localized air quality impacts, and mitigate them as necessary in order to avoid any significant impacts. The proposed project includes 51 units. Therefore, in accordance with the GPU EIR, the proposed project would not result in a localized air quality impact (i.e., CO hot-spots) from traffic impacts.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to substantial pollutant concentrations. The proposed project would not result in a peculiar substantial pollutant concentrations impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce substantial pollutant concentrations. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

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

The GPU EIR acknowledged the potential for nuisance odors from construction and operational activities. Impacts were determined to be less than significant. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to odors.

Odors are the only potential construction emissions other than the sources addressed in the prior Impact Statements. Potential sources that may produce objectionable odors during construction activities include equipment exhaust, application of asphalt and architectural coatings, and other interior and exterior finishes. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site and would be temporary in nature and would not persist beyond the termination of construction activities. The proposed project would utilize standard construction techniques, and the odors would be typical of most construction sites and temporary in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. The construction contractor will ensure that activities comply with SCAQMD Rules 401 (Visible Emissions) and 402 (Nuisance) to prevent the occurrence of public nuisances and visible dust plumes traveling off-site. Therefore, the proposed project would not result in an impact related to construction odors and other nuisances.

Odors are the only potential operational emissions other than the sources addressed in the prior Impact Statements. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The operations would comply with SCAQMD Rule 402, which would prohibit any air quality discharge that would be a nuisance or pose any harm to individuals of the public. Therefore, the proposed project would not result in a significant impact related to operational odors or other nuisances.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to odors. The proposed project would not result in a peculiar odor impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce odors. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

**Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.

2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The GPU EIR included Mitigation Measure T-1(c) to address impacts to Air Quality. With implementation of Mitigation Measure T-1(c), implementation of the GPU would not result in traffic congestion at intersections that would expose sensitive receptors to substantial pollutant concentrations. Implementation of PlanWC Policies P1.1 and P1.3 would ensure all other potential project-related air quality impacts would be less than significant. No additional mitigation measures contained in the GPU EIR apply to air quality impacts.



|                                                                                                                                                                                                                                                                                                                  | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.4 BIOLOGICAL RESOURCES.</b> <i>Would the project:</i>                                                                                                                                                                                                                                                       |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| 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 Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?                                                                 | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                                                               | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| e) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?                                                                                                                               | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                                                                                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses biological resources impacts on pages 78 through 97. Adherence to the following General Plan policies was determined to reduce biological resources impacts to less than significant:

- PlanWC Policy P1.6: Preserve, conserve, and add to public open space.

- PlanWC Action A1.6b: Continue to add public open spaces through developer dedication, in-lieu fees, or conservation easements.
- PlanWC Policy P1.11: Plant to maximize the social, economic, and environmental benefits of trees.
- PlanWC Policy Action A1.11c: Pursue an expanded and equitable distribution of trees and greening throughout the City. Fill in the gaps in canopy cover, address aging tree population, and identify vacant and new planting spots. Target planting where pedestrian and public realm improvements are prioritized such as safe streets to schools and parks. Set a citywide tree canopy coverage goal.
- PlanWC Policy P1.5: Where appropriate, new development shall minimize impervious area, minimize runoff and pollution, and incorporate best management practices. The GPU EIR concluded that impacts associated with biological resources would be less than significant following implementation of General Plan goals and policies.

### Project Specific Impacts

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

The project site is located in a highly urbanized area and is currently developed with commercial uses. Plant life is limited to non-native and ornamental species used for landscaping. Animal life is comprised of common bird, insect, reptile, and small mammal species. According to the California Natural Diversity Database (CNDDB), the project site does not contain any endangered, rare, or threatened species.<sup>13</sup> Therefore, the proposed project would not have an 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS), and no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat.<sup>14</sup> It also does not support other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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<sup>13</sup>California Department of Fish and Wildlife. BIOS 6 Viewer, <https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv>. Accessed November 14, 2022.

<sup>14</sup>U.S. Fish & Wildlife Service (FWS). *National Wetlands Inventory, Wetlands Mapper*, <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>. Accessed November 14, 2022.

- c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

The project site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. The project site is located in a highly urbanized area and is entirely developed. Therefore, the proposed project would not have any effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and no impacts would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site and its surrounding area are highly urbanized, and no wildlife corridors are known to exist on or immediately surrounding the project site. If migratory birds were to traverse the project site, the birds would likely utilize mature vegetation on the project site, some of which may potentially provide nesting sites for migratory birds. Although the proposed project would remove several trees within the project site, which could affect migratory birds, the removal of mature trees is required to comply with the Migratory Bird Treaty Act (MBTA). Under the MBTA, if such removal activities occur during the nesting season (February 15 through August 15), a biological monitor shall be present during the removal activities to ensure that no active nests would be adversely affected. As the project applicant would be required to comply with the MBTA, the proposed project is not expected to interfere with wildlife movement or impede the use of native wildlife nursery sites. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

- e) **Would the project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

The project site contains ornamental trees. During construction activities, the proposed project would remove several trees on or adjacent to the project site. The removal of trees on the project site is required to comply with the City's tree preservation ordinance (WCMC, Chapter 26, Article VI, Division 9 – Preservation, Protection and Removal of Trees). As the project applicant would be required to comply with the City's tree preservation ordinance related to tree removal, the proposed project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is located in an urbanized area of the City of West Covina and is not located within or adjacent to the boundaries of any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Biological Resources found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Biological Resources.

|                                                                                                                           | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.5 CULTURAL RESOURCES.</b> <i>Would the project:</i>                                                                  |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?    | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |
| c) Disturb any human remains, including those interred outside of formal cemeteries?                                      | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts to cultural resources on pages 98 through 108. The GPU EIR concludes that impacts to historical resources would be less than significant with mitigation incorporated. The following General Plan policies were amended or added as a result of the GPU EIR to reduce project impact on cultural resources:

1. PlanWC Policy P7.7 (Included as GPU EIR Mitigation Measure CR-2): Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and AB 52 and SB 18 for consultation with Native American tribes for development projects carried out within the City.
2. PlanWC Action A7.7 (Included as GPU EIR Mitigation Measure CR-2): Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

### Project Specific Impacts

**a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?**

Section 15064.5 of the CEQA Guidelines generally defines historical significance as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. The entirety of the project site is developed with a 95-stall surface parking lot. The parking lot, which would be demolished as part of the proposed project, is not historically significant and does not contain elements that are associated with significant

events. Therefore, no impacts would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

PRC Section 21083.2 defines unique archaeological resources as archaeological artifacts, objects, or sites that can be shown to have a high probability of 1) containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) having a special and particular quality such as being the oldest or best example of its type, or 3) being directly associated with a scientifically recognized important prehistoric or historic event or person. The project site is located in an urbanized area that has been previously disturbed. Any surficial archaeological resources that may have existed on the project site are likely to have been previously disturbed or removed. Despite this, excavation activities associated with the construction of the subterranean parking structure may disturb native soils, and there is the potential of disturbing previously undiscovered archaeological resources. GPU EIR Mitigation Measure CR-2, incorporated into the PlanWC as Policy P7.7 and Action A7.7 would require development to minimize and fully mitigate the impacts to the resources through cooperation with the City and potentially impacted Native American tribes and organizations. Therefore, impacts would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

While no formal cemeteries, other places of human interment, or burial grounds or sites are known to exist within the project site, there is always a possibility that human remains may be unexpectedly encountered during construction. The proposed project is required to comply with Section 7050.5 of the State Health and Safety Code in the event that human remains are encountered during construction. With the compliance of the State Health and Safety Code, no impacts would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Cultural Resources found all impacts to be less than significant with the incorporation of Mitigation Measure CR-2. Mitigation Measure CR-2 was incorporated into the GPU as Policy P7.7 and Action A7.7. No additional mitigation measures contained in the GPU EIR apply to impacts to Cultural Resources.

|                                                                                                                                                                                   | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.6 ENERGY.</b> <i>Would the project:</i>                                                                                                                                      |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?                                                                                     | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

Impacts related to the consumption of energy resources are discussed in the GPU EIR under Section 4.15, Utilities and Service Systems on pages 265 through 286. Impacts related to potential conflicts with state or local plans are discussed in the GPU EIR under Section 4.6, Greenhouse Gas Emissions on pages 129 through 141, and Section 4.15, Utilities and Service Systems. The GPU EIR concluded that there would be no GPU-related impacts related to GHGs or Utilities and Service Systems, and no mitigation measures are applied to either GHGs or Utilities and Service Systems. General Plan policies were amended or added as a result of the GPU EIR to reduce project impact on energy resources:

1. PlanWC Action A3.6: Key land use adaptation strategies to reduce greenhouse gas emissions are promoting transit-oriented infill development and providing incentives for high-performance buildings and infrastructure.
2. PlanWC Policy P5.7: Manage & develop safe, reliable, economical water supply for existing & planned new customers.
3. PlanWC Action A5.7a: Reduce demand through water conservation techniques.

### Project Specific Impacts

- a) **Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**
- b) **Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

The main forms of available energy supply are electricity, natural gas, and oil. During construction of the proposed project, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control, powering lights, electronic equipment, or other construction activities that require electrical power. Construction activities typically do not involve the consumption of natural gas. Construction activities would consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment, round-trip construction worker travel to the project site, and delivery and haul truck trips. Construction activities would comply with



CARB's "In-Use Off-Road Diesel Fueled Fleets Regulation", which limits engine idling times to reduce harmful emissions and reduce wasteful consumption of petroleum-based fuel. Additionally, the proposed project would comply the California Renewable Portfolio Standard, the Clean Energy and Pollution reduction Act of 2015 (Senate Bill 350). Compliance with local, state, and federal regulations would reduce short-term energy demand during the proposed project's construction to the extent feasible, and the proposed project construction would not result in a wasteful or inefficient use of energy.

During operations of the proposed project, Southern California Edison would provide electricity and Southern California Gas Company would provide natural gas to the project site. Energy use associated with operation of the proposed project would be typical of residential uses, requiring electricity and natural gas for interior and exterior building lighting, heating, elevators, ventilation, air conditioning, electronic equipment, machinery, refrigeration, appliances, security systems, and more. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, the proposed project would result in transportation energy use associated with vehicle trips generated by the proposed apartment complex. However, the proposed project does not involve any characteristics or processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or involve the use of equipment that would not conform to current emissions standards and related fuel efficiencies.

The City of West Covina has not adapted a local climate action plan or other plans related to the reduction of consumption of energy resources. The proposed project would be consistent with the plans and policies of the PlanWC and any of the mitigation measures identified in the GPU EIR for the purpose of reducing energy consumption and demand. The proposed project is an infill development that will be designed to achieve LEED certification, and thus complies with the PlanWC Action A3.6. The proposed project would use recycled water for its drought-tolerant landscaping features and other water reducing techniques to comply with the PlanWC Policy P5.7 and Action 5.7a. The proposed project will be subject to the California Green Building Standards Code, which requires new buildings to reduce water consumption, employ building commissioning to increase building system efficiencies for large buildings, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project does not include any feature (i.e., substantially alter energy demands) that would interfere with implementation of these state and City codes and plans. Therefore, a less-than-significant impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.

4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Greenhous Gas Emissions and Utilities and Service Systems found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Energy Resources.

|                                                                                                                                                                                                                                                                                        | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.7 GEOLOGY AND SOILS.</b> <i>Would the project:</i>                                                                                                                                                                                                                                |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:                                                                                                                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to division of Mines and Geology Special Publication 42. | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                                                                     | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                                                                           | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| iv) Landslides?                                                                                                                                                                                                                                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                                                                          | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?                                                      | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| d) Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?                                                                                                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?                                                                                                   | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts related to geology and soils on pages 110 through 128. The basic geologic setting of the project area has not changed since certification of the GPU EIR. The GPU EIR found that all impacts related to geology and soils would be less than significant with required implementation of existing regulations, policies, actions, and standard practices, including the following:

- Current California Building Code (CBC), International Building Code (IBC), and the City's General Plan, PlanWC, and Downtown Plan and Code requirements and guidelines for buildings constructed in areas of high seismic risk.

- PlanWC Policy P6.15: Limit the exposure to potential natural hazards through adoption and enforcement of appropriate building standards, land use controls, and environmental review.
- PlanWC Action A6.15a: Require all development to comply with the provisions of the latest California Building Code, including provisions related to design and engineering to mitigate potential impacts from seismic events, fires, and other hazards.
- PlanWC Action A6.15c: Require CEQA environmental reviews to analyze and as necessary mitigate potential natural hazards on a site-specific basis.
- PlanWC Policy P6.16: Take actions to reduce the potential for loss of life or property in areas of high seismic risk and areas subject to landslide and liquefaction hazards.
- PlanWC Action A6.16: Require geological and soils engineering investigations in areas of moderate or high landslide risk, potential liquefaction and subsidence areas, and critical seismic zones such as Alquist-Priolo fault zones or areas where potential ground acceleration values exceed applicable standards of the California Building Code.
- PlanWC Policy P1.5: Where appropriate, new development shall minimize impervious area, minimize runoff and pollution, and incorporate best management practices.

All work requiring a grading permit would be required to have an Erosion Control Plan approved by the City. According to the GPU EIR, no mitigation measures were necessary, as the policies included in the GPU fully mitigate potential impacts associated with implementation of the GPU, Downtown Plan and Code, and any resulting infill development and urban expansion projects.

### Project Specific Impacts

- a.i) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving 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?**

The Alquist-Priolo Earthquake Fault Zoning Act regulates development near active faults to mitigate the hazard of surface fault rupture. It prohibits the location of most structures for human occupancy across the trace of active faults. The Act also establishes Earthquake Fault Zones and requires geologic/seismic studies of all proposed developments within 1,000 feet of the zone. The Earthquake Fault Zones are delineated and defined by the State Geologist and identify areas where potential surface rupture along a fault could occur. According to the California Department of Conservation Earthquake Zones of Required Investigation map for the Baldwin Park Quadrangle, the project site is not located within the Alquist-Priolo Special Studies Zone, and no trace of any known active or potentially active fault passes through the project site.<sup>15</sup> The proposed project does not involve any activities that would potentially exacerbate existing environmental conditions so as to increase the potential to expose people or structures to the rupture of a known earthquake fault. The type of development proposed on the project site is typical of urban environments and would not involve deep excavation into the Earth or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust that would result in the rupture of a fault. Therefore,

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<sup>15</sup>California Department of Conservation. *Earthquake Zone of Required Investigation*, <https://maps.conservation.ca.gov/eqzapp/app/>. Accessed November 14, 2022.

no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**a.ii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?**

As with all properties in the seismically active Southern California region, the project site is susceptible to ground shaking during a seismic event. The proposed project does not include activities that would increase the potential to expose people or structures to adverse effects involving strong seismic ground shaking, such as deep excavation or boring of large areas. Additionally, the design and construction of the proposed structures are required to conform to the California Building Code seismic standards, as well as all other applicable codes and standards. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**a.iii) Would the project expose people or structures to potential substantial adverse effects, including seismic-related ground failure, including liquefaction?**

Liquefaction is a phenomenon in which saturated cohesionless soil causes a temporary transformation of the soil to a fluid mass. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from the lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. According to the California Department of Conservation's Earthquake Zones of Required Investigation map for the Baldwin Park Quadrangle, the project site is not located within a liquefaction hazard zone. The nearest liquefaction zone is approximately 1.6 miles west of the project site.<sup>16</sup> Therefore, no impacts would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**a.iv) Would the project expose people or structures to potential substantial adverse effects, including landslides?**

According to the California Department of Conservation's Earthquake Zones of Required Investigation map for the Baldwin Park Quadrangle, the project site is not located within an earthquake-induced landslide area.<sup>17</sup> Additionally, the project site and its surroundings are relatively flat. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The majority of the project site is covered with impervious surfaces, and upon completion of the proposed project, the project site would continue to be covered with a similar amount of impervious surfaces. The project site and its surroundings would not be susceptible to indirect erosion processes (e.g., uncontrolled runoff) caused by the proposed project.

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<sup>16</sup>California Department of Conservation. *Earthquake Zone of Required Investigation*, <https://maps.conservation.ca.gov/cgs/eqzapp/app/>. Accessed November 14, 2022.

<sup>17</sup>*Ibid.*

Thus, no exposed areas subject to erosion would be created or affected during operation of the proposed project.

During ground disturbing activities, such as grading, the project site could potentially be subject to soil erosion or loss of topsoil. However, the proposed project would be required to comply with local, state, and federal regulations and standards related to minimizing potential erosion impacts. Additionally, the City requires that the applicant prepare an erosion control plan to be submitted to and approved by the City Engineer prior to the start of the raining season, and all erosion control devices are required to be provided and maintained during the raining season and be placed at the end of each workday. Further, the construction contractor is required to implement erosion control measures during ground disturbing activities to control erosion. Therefore, impacts related to soil erosion or the loss of topsoil would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

As discussed above under the Response to Exemption Checklist Questions 3.6(a.iii) and 3.6(a.iv), the project site is not located within a liquefaction hazard zone or an earthquake-induced landslide area.<sup>18</sup> The proposed project would not create liquefaction or landslide hazards because the proposed project would not affect seismic conditions or alter underlying soil or groundwater characteristics that govern liquefaction potential. Additionally, the project site and the surrounding area are relatively flat and, thus, are not susceptible to landslides.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The compaction of subsurface sediments by fluid withdrawal will cause subsidence or ground collapse overlying a pumped reservoir. The project site and its vicinity do not contain any subsurface oil extraction facilities or groundwater withdrawal activities. The project site is located in an area with predominately commercial and residential uses. The multi-family apartment building and amenities proposed for the project site would be consistent with the uses that currently exist on the project site and its surrounding area and with the policies of the Downtown Code. The proposed project would not introduce any subsurface oil extraction facilities, mining activities, or extraction of mineral resources. Thus, the proposed project would not cause or exacerbate existing conditions associated with subsidence and collapse. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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<sup>18</sup>California Department of Conservation. *Earthquake Zone of Required Investigation*, <https://maps.conservation.ca.gov/eqzapp/app/>. Accessed November 14, 2022.

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

Expansive soils have relatively high clay mineral content and are usually found in areas where underlying formations contain an abundance of clay minerals. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. The project site is currently developed and is not located in an area with expansive soils. It is located in an area that is covered by younger alluvial fan deposits consisting of gravel, sand, and silt. The underlying soil is not clay based.<sup>19</sup> Additionally, project design features and construction would comply with all applicable building codes and standards. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is located in a highly urbanized area of the City of West Covina, where wastewater infrastructure is currently in place. The project site is served by a wastewater disposal system operated by the Los Angeles County Sanitation District. No septic tanks are located on-site, and existing sewer lines would be used for the disposal of wastewater. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Geology and Soils found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Geology and Soils.

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<sup>19</sup>University of California, Davis. *SoilWeb*, <https://casoilresource.lawr.ucdavis.edu/gmap/>. Accessed November 14, 2022.

|                                                                                                                                  | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.8 GREENHOUSE GAS EMISSIONS.</b> <i>Would the project:</i>                                                                   |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses greenhouse gas (GHG) emissions on pages 129 through 141. The GPU EIR states that implementation of the GPU would generate new greenhouse gas emissions, directly and indirectly. However, GPU policies would help the City achieve the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which would contribute to the achievement of SCAG's goal for per capita GHG emissions reductions required by California State Senate Bill (SB) 375. Therefore, the GPU EIR concluded that there would be no GPU-related impacts related to GHG emissions, and no mitigation measures were required or identified. Therefore, GHG impacts of the GPU would be less than significant.

The GPU policies and actions that focus on GHG emissions reductions include:

- PlanWC Policy P3.6: Reduce West Covina's production of greenhouse gas emissions and contribution to climate change, and adapt to the effects of climate change.
- PlanWC Action A3.6: Key land use adaptation strategies to reduce greenhouse gas emissions are: promoting transit-oriented infill development, and providing incentives for high-performance buildings and infrastructure.

**Climate Change Topical Information.** Climate change refers to variations in average long-term meteorological conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and frequency and severity of extreme weather events. Historical records indicate that global climate fluctuations have occurred in the past due to natural phenomena; however, recent data increasingly suggests that the current global conditions are distinct from previous patterns and are influenced by anthropogenic (human-sourced) GHG emissions. GHGs are a class of pollutants that are generally understood to play a critical role in controlling atmospheric temperature near the Earth's surface by allowing high frequency shortwave solar radiation to enter the planet's atmosphere and then subsequently trapping low frequency infrared radiative energy that would otherwise emanate back out into space. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes; the glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. The levels of GHGs in the atmosphere affect how much heat energy can be absorbed.



Radiative forcing is an expression of the net difference in energy entering Earth's atmosphere versus leaving it. Each GHG possesses its own degree of climate forcing ability to absorb low frequency infrared energy, meaning that some GHGs are more effective in trapping heat in the atmosphere than others. Water vapor is the most environmentally prevalent GHG, however, definitive methods are not established to regulate emissions and concentrations of water vapor in the atmosphere. After water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) are the most ubiquitous GHGs, and CO<sub>2</sub> is commonly used as the standard reference for characterizing the relative global warming potential (GWP) of other GHGs. The GWP value describes the relative magnitude of climate forcing effects of GHGs and is used to convert emissions into CO<sub>2</sub>-equivalents (CO<sub>2</sub>e). **Table 6** presents the GWP value and atmospheric lifetime of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, as well as other regulated GHGs emitted by human activities. GHG emissions that would be generated by the proposed project are assessed in units of metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e).

**TABLE 6: GLOBAL WARMING POTENTIAL FOR VARIOUS GREENHOUSE GASES**

| Pollutant                              | Lifetime (Years) /a/ | Global Warming Potential (20-Year) | Global Warming Potential (100-Year) /b/ |
|----------------------------------------|----------------------|------------------------------------|-----------------------------------------|
| Carbon Dioxide (CO <sub>2</sub> )      | --                   | 1                                  | 1                                       |
| Methane (CH <sub>4</sub> )             | 12                   | 21                                 | 25                                      |
| Nitrous Oxide (N <sub>2</sub> O)       | 114                  | 310                                | 298                                     |
| Nitrogen Trifluoride                   | 740                  | Unknown                            | 17,200                                  |
| Sulfur Hexafluoride (SF <sub>6</sub> ) | 3,200                | 23,900                             | 22,800                                  |
| Perfluorocarbons (PFCs)                | 2,600-50,000         | 6,500-9,200                        | 7,390-12,200                            |
| Hydrofluorocarbons (HFCs)              | 1-270                | 140-11,700                         | 124-14,800                              |

/a/ Lifetime refers to the approximate amount of time it would take for the anthropogenic increment to an atmospheric pollutant concentration to return to its natural level as a result of either being converted to another chemical compound or being taken out of the atmosphere via a sink.

/b/ The United States primarily uses the 100-year GWP as a measure of the relative impact of different GHGs. However, the scientific community has developed a number of other metrics that could be used for comparing one GHG to another. These metrics may differ based on timeframe, the climate endpoint measured, or the method of calculation. For example, the 20-year GWP is sometimes used as an alternative to the 100-year GWP. Just like the 100-year GWP is based on the energy absorbed by a gas over 100 years, the 20-year GWP is based on the energy absorbed over 20 years. This 20-year GWP prioritizes gases with shorter lifetimes, because it does not consider impacts that happen more than 20 years after the emissions occur. Because all GWPs are calculated relative to CO<sub>2</sub>, GWPs based on a shorter timeframe will be larger for gases with lifetimes shorter than that of CO<sub>2</sub>, and smaller for gases with lifetimes longer than CO<sub>2</sub>.

**SOURCE:** CARB, *Global Warming Potentials*, <https://www.arb.ca.gov/cc/inventory/background/gwp.htm>, accessed January 4, 2023.

**Regulatory Framework.** In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. SB 375 finds that the “transportation sector is the single largest contributor of greenhouse gases of any sector.” Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the Metropolitan Planning Organization for the region in which the City is located. CARB set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions

in 2010, and updated them in 2018. In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions. Under SB 375, the target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS. The SCAG 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

**Existing Setting.** Emissions of GHGs are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the emission of GHGs into the atmosphere and the storage of GHG in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.) has contributed to a rapid increase in atmospheric levels of GHGs over the last 150 years. **Table 7** shows statewide GHG emissions inventory from 2010 to 2020 compiled by the CARB, the State agency with jurisdiction over air pollutant emissions. California's GHG emissions have followed a declining trend since 2008. In 2019, emissions from routine emitting activities statewide were 7.1 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e) lower than 2018 levels and almost 13 MMTCO<sub>2</sub>e below the 2020 GHG limit of 431 MMTCO<sub>2</sub>e.

| <b>TABLE 7: CALIFORNIA GREENHOUSE GAS EMISSIONS INVENTORY TREND</b>                                                                                                                                                              |                                                        |              |              |              |              |              |              |              |              |              |              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| <b>Sector</b>                                                                                                                                                                                                                    | <b>CO<sub>2</sub>e Emissions (Million Metric Tons)</b> |              |              |              |              |              |              |              |              |              |              |
|                                                                                                                                                                                                                                  | <b>2010</b>                                            | <b>2011</b>  | <b>2012</b>  | <b>2013</b>  | <b>2014</b>  | <b>2015</b>  | <b>2016</b>  | <b>2017</b>  | <b>2018</b>  | <b>2019</b>  | <b>2020</b>  |
| Electricity Generation (In-State)                                                                                                                                                                                                | 46.7                                                   | 42.6         | 54.5         | 53.5         | 53.0         | 52.0         | 44.1         | 40.2         | 40.4         | 38.5         | 40.9         |
| Electricity Generation (Imports)                                                                                                                                                                                                 | 43.6                                                   | 46.6         | 44.4         | 40.0         | 36.8         | 33.9         | 26.4         | 23.9         | 24.6         | 21.7         | 18.6         |
| Transportation                                                                                                                                                                                                                   | 162.9                                                  | 159.5        | 156.9        | 157.0        | 157.7        | 161.5        | 165.2        | 166.6        | 165.3        | 162.4        | 135.8        |
| Industrial                                                                                                                                                                                                                       | 87.8                                                   | 85.8         | 80.7         | 83.0         | 85.2         | 83.2         | 81.6         | 81.7         | 81.9         | 80.4         | 73.3         |
| Commercial and Residential                                                                                                                                                                                                       | 46.0                                                   | 46.0         | 39.2         | 39.1         | 35.6         | 36.3         | 37.2         | 37.6         | 37.4         | 40.5         | 38.7         |
| Agriculture                                                                                                                                                                                                                      | 33.6                                                   | 34.2         | 35.2         | 33.9         | 33.9         | 32.6         | 32.2         | 31.7         | 32.2         | 31.4         | 31.6         |
| High GWP                                                                                                                                                                                                                         | 13.5                                                   | 14.5         | 15.5         | 16.8         | 17.7         | 18.6         | 19.4         | 20.1         | 20.5         | 20.7         | 21.3         |
| Recycling and Waste                                                                                                                                                                                                              | 8.1                                                    | 8.2          | 8.2          | 8.3          | 8.3          | 8.4          | 8.5          | 8.6          | 8.7          | 8.8          | 8.9          |
| <b>Emissions Total</b>                                                                                                                                                                                                           | <b>442.2</b>                                           | <b>437.4</b> | <b>434.6</b> | <b>431.5</b> | <b>428.2</b> | <b>426.6</b> | <b>414.5</b> | <b>410.5</b> | <b>411.0</b> | <b>404.4</b> | <b>369.1</b> |
| <b>SOURCE:</b> CARB, <i>California Greenhouse Gas Emission Inventory - 2022 Edition</i> ; Data available at: <a href="https://ww3.arb.ca.gov/cc/inventory/data/data.htm">https://ww3.arb.ca.gov/cc/inventory/data/data.htm</a> . |                                                        |              |              |              |              |              |              |              |              |              |              |

Regional and local GHG emissions inventories have also been prepared in recent years. For the SCAG region, development of the 2012 RTP/SCS included a Metropolitan Planning Area-wide GHG emissions inventory for the base year of 2012, as well as a projection for the year 2020.<sup>20</sup> Similar to the California GHG emissions profile, transportation, industrial, and electricity uses represented the greatest contributors to the inventory. Total SCAG emissions were forecasted to be approximately 216 MMTCO<sub>2</sub>e in 2020, with approximately 38.5 percent of emissions within the SCAG region being attributed to the transportation sector. SCAG modeling prepared to support the Program Environmental Impact Report for the Connect SoCal plan estimated that in 2019, on-road light, medium, and heavy-duty vehicle GHG emissions were approximately 75.8 MMTCO<sub>2</sub>e, of which 37.6 MMTCO<sub>2</sub>e—approximately 50 percent—occurred within Los Angeles County.

### Project-Specific Impacts

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

The GPU EIR concluded that policies contained in PlanWC and the Downtown Plan would limit GHG emissions. Individual development projects that could occur would be required to undergo CEQA review and would be subject to policies contained in PlanWC and the Downtown Plan to reduce GHG impacts. No mitigation measures outside of adherence to these policies was required in the GPU EIR. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to GHG emissions.

Construction emissions are estimated using the latest California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3). Emission factors applicable to the Los Angeles County portion of the SCAB were used in conjunction with conservative estimates of equipment activity, worker trips, fugitive dust generation, and material hauling trips to estimate maximum daily emissions during each construction phase. Construction emissions were estimated using detailed equipment inventories and construction scheduling information provided by the engineering team combined with emissions factors

<sup>20</sup>SCAG. *Final South California Association of Governments (SCAG) Regional Greenhouse Gas Inventory and Reference Case Projections, 1990-2035*. May 2012.

from the EMFAC and OFFROAD models that are built into the CalEEMod program. In accordance with SCAQMD methodology, the total amount of GHG emissions that would be generated by construction of the proposed project was amortized over the operational life of the project to represent long-term impacts, which for this project is assumed to be 30 years.

CalEEMod was also used to produce estimates of daily air pollutant emissions during future operation. Sources of GHG emissions during project operation include automobile trips associated with landscaping equipment, water use, and waste generation. The proposed project would generate 344 daily vehicle trips. Mobile source emissions were estimated using EMFAC emission rates in CalEEMod. Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors, provided in Section 2.4 of USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. Emissions related to water usage and wastewater generation were calculated using CalEEMod emission inventory model which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water. GHG emissions are related to the energy used to convey, treat, and distribute water and wastewater. Thus, the emissions are generally indirect emissions from the production of electricity to power these systems. GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG intensity factors for the local utility provider.

Neither the City nor the SCAQMD has officially adopted a quantitative threshold value for determining the significance of GHG emissions that will be generated by projects under CEQA. Although there are no GHG emissions thresholds presently promulgated, the SCAQMD convened a GHG CEQA Significance Threshold Stakeholder Working Group beginning in April of 2008 to examine alternatives for establishing quantitative GHG thresholds. Based on collaborative efforts of the Working Group, SCAQMD staff published the Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold in October 2008. The Working Group proposed a 3,000 MTCO<sub>2</sub>e annual threshold for commercial projects, which was derived using a 90 percent capture rate for proposed CEQA projects within the SCAQMD jurisdiction. Projects with annual GHG emissions below 3,000 MTCO<sub>2</sub>e are assumed to result in less than significant impacts.

**Table 8** shows that combined, amortized construction and operational emissions would result in 862 MTCO<sub>2</sub>e annually of GHG emissions. Emissions would not exceed the SCAQMD draft interim significance threshold of 3,000 MTCO<sub>2</sub>e. Therefore, the proposed project would result in a less-than-significant impact related to GHG emissions.

| <b>TABLE 8: PROPOSED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS</b> |                                                |
|------------------------------------------------------------------|------------------------------------------------|
| <b>Emissions Source</b>                                          | <b>Annual Emissions (Metric Tons per Year)</b> |
| Construction Emissions Amortized (Direct)                        | 421                                            |
| Operational Area Source Emissions (Direct)                       | 0.88                                           |
| Operational Energy Source Emissions (Indirect)                   | 59.9                                           |
| Operational Mobile Source Emissions (Direct)                     | 362                                            |
| Operational Waste Disposal Emissions (Indirect)                  | 13.6                                           |
| Operational Water Distribution Emissions (Indirect)              | 4.7                                            |
| <b>TOTAL</b>                                                     | <b>862</b>                                     |
| SCAQMD Draft Interim Significance Threshold                      | 3,000                                          |
| <b>Exceed Threshold?</b>                                         | <b>No</b>                                      |
| <b>SOURCE:</b> TAHA, 2023.                                       |                                                |

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to GHG emissions. The proposed project would not result in a peculiar GHG emissions impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce GHG emissions. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

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

The GPU EIR concluded that planned development would be consistent with the major initiatives contained in SCAG's 2016-2040 RTP/SCS to reduce GHG emissions per capita by eight percent by 2020, 18 percent by 2035, and 21 percent by 2040, all compared to 2005 levels. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to substantial pollutant concentrations.

Although the City of West Covina has not adapted a local CAP or another form of a GHG Reduction Plan, a number of General Plan policies would reduce citywide levels of GHG over time. The proposed project is consistent with pertinent General Plan policies, specifically Policy P1.1 to promote alternative transportation modes, including walking and transit, because the project would be located near existing commercial development and within 500 feet of a bus stop. In addition, the proposed project would be consistent with General Plan Policy P3.6 to reduce West Covina's production of GHG emissions and contribution to climate change by implementing alternative modes of transportation and providing resident amenities on the project site. The design and implementation of the proposed project would comply with Cal Green Building Standards, which includes measures to reduce emissions.

Table 4.6-1 on page 138 demonstrated consistency with goals and strategies in the SCAG 2016-2040 RTP/SCS. The current version of this SCAG planning document is the 2020-2045 RTP/SCS, which includes similar goals and strategies. The table from the GPU EIR is not replicated here for brevity, although the following demonstrates the proposed project's consistency with the RTP/SCS. The proposed project is consistent with the assumption in many regional plans, such as the SCAG 2020-2045 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. Consistent with SCAG's RTP/SCS alignment of transportation and land use, the proposed project would accommodate new residences and associated travel demand

by implementing smart land use strategies. the proposed project is a common in-fill residential development. There is no potential for such development to interfere with GHG reduction plans and policies. The proposed project is an infill development located within 0.5 miles of a Transit Priority Location (TPA) route near downtown West Covina. The project site is well served by bus transit lines operated by Foothill Transit, and a major transit center is located at the Plaza at West Covina. A bus stop is located on Vincent Avenue, approximately 320 feet to the northwest of the project site. In addition, the City of West Covina operates local transit service (Go West Shuttle), which stops near the project site on Lakes Drive. In addition, the proposed project would incorporate conservation strategies to reduce on-site energy consumption and include the installation of high efficiency lighting fixtures to reduce lighting energy consumption by up to 20 percent and water conservation features to reduce water use by 15 percent. These features would ensure that the proposed project would be consistent with GHG reduction measure.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to conflicts with GHG reduction plans. The proposed project would not result in a peculiar GHG reduction plan impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce conflicts with GHG reduction plans. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Greenhouse Gas Emissions found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Greenhouse Gas Emissions.

|                                                                                                                                                                                                                                                                  | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.9 HAZARDS AND HAZARDOUS MATERIALS.</b> <i>Would the project:</i>                                                                                                                                                                                            |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                                                                                          | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                                                  | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                  | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                   | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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 for people residing or working in the project area? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts related to hazards and hazardous materials on pages 143 through 165. The GPU EIR addresses the following issues, discussed below: hazardous materials use and storage, existing contaminated sites, air traffic hazards, emergency response and evacuation plan requirements, and the risk of exposure to wildland fires. GPU EIR states that implementation of the GPU would generate impacts related to an incremental increase in the overall routine transport, use, storage, and disposal of hazardous materials within the City; the release of hazardous materials into the environment through reasonably foreseeable upset and

accident conditions or disturbance of existing contamination; and an increase in residential or commercial development in areas that are susceptible to wildland fires. The GPU EIR would not result in impacts related to an increase in people residing or working near public or private airports, implementation of adopted emergency response and evacuation plans, new greenhouse gas emissions, directly and indirectly. However, compliance with GPU policies as well as local, state, and federal regulations regarding the handling, transport, and storage of hazardous materials would reduce the significance of these impacts to less than significant levels. Therefore, the GPU EIR concluded that GPU-related impacts related to hazards and hazardous materials would be less than significant, and no mitigation measures were required or identified. Therefore, hazardous and hazardous materials impacts of the GPU would be less than significant. GPU policies and actions that focus on the mitigation of hazards and hazardous materials include:

- Downtown Plan Policy P8.1: Accommodate multimodal mobility, accessibility and safety needs when planning, designing, and implementing transportation improvements, improving access and circulation for all users of Downtown streets.
- PlanWC Policy P6.13: Optimize firefighting and emergency response capabilities.
- PlanWC Action A6.13a: Resolve extended response time problems by: increasing fire staffing to coincide with increasing population, development, and call for services; require the funding of new services from fees or assessments from new development.
- PlanWC Policy P6.21: Update West Covina's Natural Hazard Mitigation Plan (NHMP) on a regular basis in order to reflect changing conditions, best practices, regulatory environment, and advancements in knowledge; and to maintain eligibility for public assistance grants.
- PlanWC Policy P6.22: Develop and disseminate educational programs, through a variety of media, to familiarize the citizens of West Covina with the Safety Element, the NHMP, and related issues.
- PlanWC Policy P6.17: Take actions to reduce the potential for loss of life or property in high fire hazard areas.
- PlanWC Action A6.17g: Continue to support programs to reduce fire hazards from vegetation in areas of extreme to high fire risk. Such programs may take a variety of forms and would include current City weed and brush removal programs, as well as control and use of fire retardant plantings.

### Project Specific Impacts

- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Construction of the proposed project would involve the temporary use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all hazardous materials during construction and operations would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. During operational activities, the proposed 51-unit apartment building would involve limited use and storage of common hazardous



substances typical of those used in multi-family residential facilities, such as custodial products, pesticides, and other landscaping supplies. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. For the limited amount of hazardous waste associated with the proposed project, the proposed project would comply with all applicable standards and regulations and adhere to manufacturer's instructions related to the transport, use, or disposal of hazardous materials during construction and operation. Therefore, impacts related to the creation of hazards to the public or the environment through the routine transport, use, disposal, or release of hazardous materials would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The St. Christopher Parish School is located within one-quarter mile of the project site. As discussed above in the Exemption Checklist Question 3.8(a-b), the proposed project would involve limited use of hazardous materials (e.g., custodial products, pesticides, and other landscaping supplies). Any hazardous materials used by the proposed project would be handled in accordance with applicable state laws and regulations. The proposed project would be required to comply with the provisions of the City's Fire Code and any additional elements as required in the California Health and Safety Code Article 1 Chapter 6.95 for Business Emergency Plan. Therefore, impacts would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**d) Would the project 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?**

The California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB) each maintain a database (EnviroStor and GeoTracker, respectively) that provides access to detailed information on hazardous waste sites and their cleanup statuses. EnviroStor focuses on hazardous waste facilities and sites with known contamination or sites with possible reasons for further investigation. GeoTracker focuses on sites that impact or have the potential to impact water quality in California, with an emphasis on groundwater. A search of the EnviroStor and Geotracker databases determined that the proposed project is not included on any list of active clean-up sites compiled pursuant to Section 65962.5 of the Government Code.<sup>21,22</sup> Therefore, impacts would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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<sup>21</sup>Department of Toxic Substances Control. *EnviroStor*, <https://www.envirostor.dtsc.ca.gov/public/>. Accessed November 15, 2022.

<sup>22</sup>State Water Resources Control Board (SWRCB). *GeoTracker*, <https://geotracker.waterboards.ca.gov/>. Accessed November 15, 2022.

- 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 for people residing or working in the project area?**

The project site is not located in an airport land use plan area, or within two miles of any public or public use airports, or private air strips. The closest airport to the project site is Ontario International Airport, which is approximately 18 miles east of the project site. Therefore, the proposed project would not result in an airport- or airstrip-related safety hazard for people residing or working in the area, and no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is located near two emergency/disaster routes: Vincent Avenue and Interstate 10 (I-10). Vincent Avenue intersects Walnut Creek Drive approximately 300 feet to the west of the project site, and I-10 is approximately 0.2-mile north of the project site.<sup>23</sup> The proposed project does not involve any activities that would require temporary or permanent closure of Vincent Avenue, and emergency vehicle access will be maintained at all times during the construction and operation of the proposed project in compliance with the requirements of West Covina Fire Department (WCFD). The proposed 51-unit apartment building would not involve any uses that would interfere with an emergency response or evacuation plan. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

- g) **Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

The project site is located in a highly urbanized area of the City and is surrounded by urban uses (i.e., commercial and residential uses). The project site is not located within a wildland area, and no wildlands are located on or adjacent to the project site. The high fire risk areas of the City are largely isolated from the fire prone mountainous areas in the region. Therefore, it is unlikely that large wildfires in the San Gabriel Mountains or other large open space areas in the region would spread to the project site. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.

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<sup>23</sup>County of Los Angeles Department of Public Works. *City of West Covina Disaster Routes*. <http://dpw.lacounty.gov/dsg/disaster/routes/map/West%20Covina.pdf>. Accessed, November 14, 2022.

3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Hazards and Hazardous Materials found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Hazards and Hazardous Materials.

|                                                                                                                                                                                                                        | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.10 HYDROLOGY AND WATER QUALITY.</b> <i>Would the project:</i>                                                                                                                                                     |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?                                                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?                                  | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| i) result in a substantial erosion or siltation on- or off-site                                                                                                                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;                                                                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| iv) impede or redirect flood flows?                                                                                                                                                                                    | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?                                                                                                                    | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?                                                                                                | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

## City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts to hydrology and water quality on pages 167 through 187. The GPU EIR addresses the following potential impacts: surface water; groundwater; flooding; stormwater; and water quality. According to the GPU EIR, impacts related to the violation of water quality standards, depletion of groundwater supplies, alteration of drainage patterns, erosion, flooding hazards, stormwater runoff, and water quality would be less than significant. The following General Plan policies were referenced in the GPU EIR for minimizing risks associated with stormwater runoff and groundwater recharge:

- PlanWC Policy P1.4: Continue to protect areas of beneficial natural groundwater recharge by preventing uses that can contaminate soil or groundwater.
- PlanWC Policy P1.5: Where appropriate, new development shall minimize impervious area, minimize runoff and pollution, and incorporate best management practices.

### Project Specific Impacts

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

The project site is located within an urban area of the City and is currently developed with a surface parking lot. Construction of the proposed project would require the demolition of the existing surface parking lot, excavation, grading, construction of the 51-unit apartment building and ancillary facilities. Demolition and grading activities would result in exposed soils and debris, as well as equipment and materials that may contribute pollutants in stormwater runoff. However, the proposed project would be required to comply with all federal, State, and local regulations related to water quality standards and wastewater discharge. Construction contractors would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit. The applicant would also be required to comply with WCMC Section 9-36, which controls pollutants from new development/redevelopment projects. In accordance with the requirements of the NPDES permit and WCMC Section 9-36, the applicant would prepare and implement a standard urban stormwater mitigation plan (SUSMP) that the City would review and approve prior to construction and operation of a new development. The SUSMP shall include conditions that consist of low impact development, structural and non-structural best management practices (BMPs) and source control BMPs. Application to the City for a grading permit may result in additional requirements related to erosion and sediment controls that would further limit the potential for construction activities to result in water quality impacts related to stormwater and site runoff. Adherence to PlanWC Policy P1.5, which requires that new development minimizes impervious area, minimizes runoff and pollution, and incorporates best management practices for new development where possible, would further ensure this impact would be less than significant. Compliance with these regulations and policies would reduce the risk of water degradation within the City from soil erosion and other pollutants related to construction activities, and potential violations of water quality standards would be minimized through required BMPs. As such, the proposed project would not violate water quality standards or waste discharge requirements, nor degrade surface or ground water quality. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is primarily developed with impervious surfaces and is not currently used for groundwater recharge activities. With implementation of the proposed project, the project site would have a similar sized area of impervious surfaces. The proposed project would not install any groundwater wells and would not otherwise directly withdraw any groundwater. The proposed 51-unit apartment building would not include any uses which would substantially decrease groundwater supplies. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**c-i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?**

The nearest stream to the project site is Walnut Creek, which is located across West Covina Parkway approximately 200 feet south of the project site. This stream would not be vulnerable to operations on the project site. The project site is located in a highly developed area of the City. The majority of the project site is covered by impervious surfaces. Upon completion of the proposed project, the project site would continue to be covered with a similar sized area of impervious surfaces. Currently, the project site drains to the north towards the existing storm drains in the adjacent street rights-of-way (ROWs). The proposed project would install landscaping along the 7-foot along at the west, south, and east property line as well as terraced landscaping along Walnut Creek Parkway. With implementation of the proposed project, surface water runoff will be directed towards these landscaping features, and the remaining runoff will be directed towards the existing storm drains on Walnut Creek Parkway. Through the installation of landscaping, overall runoff from the project site would decrease when compared to existing conditions.

During demolition, on-site soils would temporarily be exposed, leading to potential erosion or siltation on- or off-site. As discussed in the CEQA Exemption Checklist Question 3.6(a), the proposed project would be required to comply with local, State, and federal regulations and standards related to minimizing potential erosion. The City requires that the applicant prepare an erosion control plan and that the construction contractor implement erosion control measures during ground disturbing activities. Therefore, the proposed project would not substantially alter the existing drainage pattern of the project site in a manner that would result in substantial erosion or siltation, and less-than-significant impacts are expected. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**c-ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

As discussed above in the CEQA Exemption Checklist Question 3.9(c-i), the nearest stream in the vicinity of the project site is Walnut Creek, located approximately 200 feet south of the project site. Currently, the project site drains to the north towards the existing storm drains in the adjacent street ROWs. The proposed project would add landscaping

around the property line and is not anticipated to substantially alter the drainage patterns on the project site, nor change the volume of stormwater runoff in a manner that would result in flooding on- or off-site. Therefore, impacts related to the alteration of drainage patterns and on- or off-site flooding would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The majority of the project site is covered by impervious surfaces, and upon completion of the proposed project, the project site would continue to be covered with a similar sized area of impervious surfaces. As discussed in the CEQA Exemption Checklist Question 3.9(c-ii), the project site drains to the north towards the existing storm drains in the adjacent street ROWs, and the proposed project would not substantially increase the amount of impervious surfaces on the project site. With implementation of the proposed project and the installation of landscaping features, surface water runoff will be directed towards the landscaping along the property line, and the remaining runoff would continue to flow to the City's existing storm drain system on Walnut Creek Parkway. Through the use of landscaping, overall runoff from the project site would decrease when compared to existing conditions.

As discussed in the CEQA Exemption Checklist Question 3.9(a), the proposed project would be required to implement BMPs to reduce stormwater runoff and polluted runoff. The proposed project is not expected to provide substantial additional sources of polluted runoff. Therefore, impacts related to storm drain capacities or polluted runoff would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**c-iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?**

As discussed above in the CEQA Exemption Checklist Question 3.9(c-i), the nearest stream in the vicinity of the project site is Walnut Creek, located approximately 200 feet south of the project site. To prevent impacts related impeding or redirecting flood flows, the construction contractors would be required to obtain an NPDES General Construction Activity Permit, comply with WCMC Section 9-36, prepare and implement a SUSMP prior to construction. The SUSMP shall include low impact development, structural and non-structural best management practices BMPs. Compliance with these regulations and policies would ensure that during construction, impacts related to the capacity of the City's existing storm drain system, the generation of polluted runoff, impede or redirection of runoff would be less than significant. No substantial changes in the existing drainage pattern would occur. Therefore, less-than-significant impacts would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

According to Section 4.8, Hydrology and Water Quality, of the GPU EIR, the proposed project is located within a Federal Emergency Management Agency (FEMA) designated 500-year flood zone area, and not within a 100-year flood hazard area.<sup>24</sup> As a result, the proposed project would not place housing or other structures within a 100-year flood hazard area. The project site is located approximately 30 miles east of the Pacific Ocean and is not in a tsunami risk zone. The nearest body of water to the project site is Walnut Creek, which is not large or deep enough to constitute a seiche zone. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

According to Section 4.8, Hydrology and Water Quality, of the GPU EIR, “water quality in the City is governed by the Los Angeles Regional Water Quality Control Board (LARWQCB), which sets water quality standards in the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The Basin Plan identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses.” The majority of the proposed project’s potable water supply would be supplied by Suburban Water Systems, which sources 80% of its water from the San Gabriel River Valley Groundwater Basin (SGRVGB). The water supply meets or exceeds all current drinking water regulations and standards.

The project site is underlain by the SGRVGB, which underlies most of the San Gabriel Valley and a portion of the upper Santa Ana Valley. From 2020-2021, approximately 196,000 acre-feet of groundwater was pumped from the SGRVGB. Due to ongoing State-wide drought conditions, the SGRVGB has implemented actions to ensure reliable water supplies and groundwater levels.<sup>25</sup> The proposed project would be required to comply with all federal, State, and local regulations related to water quality standards and wastewater discharge. Adherence to the PlanWC Policies P1.4 and P1.5 policies would further minimize the proposed project’s new net impermeable surfaces, maximize infiltration, and prevent stormwater runoff off-site. Construction contractors would be required to obtain coverage under the NPDES General Construction Activity Permit. The project applicant would also be required to comply with the WCMC Section 9-36, which controls pollutants from new development/redevelopment projects. The project applicant would be required to prepare and implement a SUSMP that the City would review and approve prior to construction and operation of a new development. The SUSMP shall include conditions that consist of low impact development, structural and non-structural BMPs and source control BMPs. Compliance with these regulations and policies would ensure that the proposed project would not conflict or obstruct implementation water quality control plan or sustainable groundwater management plan. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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<sup>24</sup>Federal Emergency Management Agency (FEMA). FEMA’s National Flood Hazard Layer (NFHL) Viewer, <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>. Accessed November 15, 2022.

<sup>25</sup>Main San Gabriel Basin Water Master. 2020-2021 Annual Report, [https://www.watermaster.org/\\_files/ugd/af1ff8\\_e4bc2adb7a2849c684c4063a9e725bcb.pdf](https://www.watermaster.org/_files/ugd/af1ff8_e4bc2adb7a2849c684c4063a9e725bcb.pdf). Accessed November 15, 2022.



## **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Hydrology and Water Quality found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Hydrology and Water Quality.

|                                                                                                                                                                                        | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.11 LAND USE AND PLANNING.</b> <i>Would the project:</i>                                                                                                                           |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Physically divide an established community?                                                                                                                                         | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts to land use and planning on pages 189 through 200. The GPU EIR concluded that development under the GPU and Downtown Plan would not include components which would physically divide the existing community, nor introduce new uses that would conflict with established uses in West Covina, nor conflict with any applicable land use plans, policies, or regulations. Additionally, the GPU EIR also references policies specific to projects anticipated under PlanWC and the Downtown Plan, and implementation of these policies would ensure land use impacts are less than significant:

- PlanWC Policy P3.1: Preserve the existing housing stock.
- PlanWC Action A3.1: Incorporate standards in the development code to preserve the existing form and character of stable residential areas and to prevent encroachment of incompatible land uses and intensity.
- PlanWC Policy P3.4: Direct new growth to Downtown area and the corridors. Adapt economically underused and blighted buildings, consistent with the character of surrounding districts and neighborhoods, to support new uses that can be more successful. Provide opportunities for healthy living, commerce, employment, recreation, education, culture, entertainment, civic engagement, and socializing.
- PlanWC Action A3.4: Adopt form-based codes for the Downtown area and corridors that: utilize clear development requirements tailored to the community's vision; increase land use choices and encourage community vitality; foster a rich public realm, with engaging private frontages, complete streets, and access to a range of open spaces; insist on the highest standards of quality in architecture, landscaping, and urban design; and offer predictable streamlined development review process and produce predictable outcomes.

### Project Specific Impacts

#### a) Would the project physically divide an established community??

The project site is fully developed and served by existing roadways. The proposed multi-family apartment building would be consistent with the residential and commercial uses that are located on and surround the project site. Vehicular access to the proposed project would be from Walnut Creek Parkway. The traffic study conducted for the proposed project found that the location and geometry of the proposed 51-unit apartment building would not cause vehicle queues to impact the project site's parking lot or adjacent public

roadways. At least one car should be able to queue on-site in front of the gate to wait while the gate opens. Vehicles will not be allowed to block the sidewalk or extend into the street to wait for the gate to open. The proposed project would not involve any street closure, would not result in the development of new thoroughfares or highways, and would not block access to or through the community. Pedestrian access would be maintained on the sidewalks along public roads surrounding the project site. No separation of uses or disruption of access between land use types would occur as a result of the proposed project. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is located in the General Plan Downtown District and is designated as “Neighborhood – High Density Residential (NH)” under the General Plan. Development within the Downtown District is regulated by the City’s Downtown Plan & Code. Under the City’s Downtown Plan & Code, the project site is zoned T4 – “General Urban Zone.”<sup>26,27</sup> The intent of the T4 – “General Urban Zone” is to provide primarily community serving retail, office, and housing at approximately 21 to 54 dwelling units per acre. The multi-family apartment building, with approximately 51 units per acre, would be consistent with the T4 zone and “Neighborhood – High Density Residential (NH)” General Plan land use designation, and would therefore be consistent with the City’s General Plan and Zoning Code.

The proposed project would be consistent with this PlanWC Policy P3.4 since the proposed project is located in the downtown area and would construct a new multi-family apartment building on a property that currently has a surface parking lot. The apartment building would be consistent with the mix of residential and commercial uses of the surrounding area. In addition, the proposed project would be accessible to pedestrians walking along the sidewalks on Walnut Creek Parkway. In addition to being consistent with the applicable General Plan policy, the proposed project would be consistent with the applicable Zoning regulations, including parking, lighting, and landscaping.

Upon approval of the Precise Plan, CUP, and Administrative Use Permit, the proposed project would be consistent with the City’s General Plan and Zoning Code. Additionally, the project is consistent with all applicable General Plan Policies and Downtown Plan and Code requirements, including PlanWC Policy P3.4 and Action A3.4. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.

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<sup>26</sup>City of West Covina. *Downtown Plan & Code*. Adopted December 2016.

<sup>27</sup>City of West Covina. *General Plan*. Adopted December 2016.

2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The GPU EIR included one (LU-2) to address impacts to Land Use and Planning. This mitigation measure was incorporated into the GPU policies. No additional mitigation measures contained in the GPU EIR apply to impacts to Land Use and Planning.

|                                                                                                                                                                        | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.12 MINERAL RESOURCES.</b> <i>Would the project:</i>                                                                                                               |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts to mineral resources on page 287. The GPU identified no known mineral deposits of local importance or value to the region or residents of the state, or locally important mineral resource recovery sites in West Covina. Consequently, the GPU EIR identified no impacts on mineral resources under implementation of the City's General Plan Update, or Downtown Plan and Code.

### Project Specific Impacts

- a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b) **Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

The project site and its surrounding area are currently developed with commercial uses. The project site is not located within a mineral producing area as classified by the California Geological Survey (CGS) and is not identified by the City of West Covina as containing significant mineral deposits site that would be of value to the region and the residents of the state. Furthermore, the project site is not located near any oil fields, and no oil extraction and/or quarry activities have historically occurred on or are presently conducted at the project site. Therefore, the proposed project would not result in the loss of availability of any known regionally valuable or locally important mineral resource, and no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

### Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.

2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Mineral Resources found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Mineral Resources.

|                                                                                                                                                                                                                                                                                                           | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.13 NOISE.</b> <i>Would the project:</i>                                                                                                                                                                                                                                                              |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| 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?                                                         | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                                                                                             | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses noise impacts on pages 201 through 215. The GPU EIR examined a range of potential impacts related to noise, including noise from construction, building operations, traffic, and flight operations. Impacts were assessed in the context of adopted planning documents. The GPU EIR did not address vibration effects, although there is reference to the Impact Statement listed in the CEQA Guidelines.

Implementation of the GPU and Downtown Plan and Code would generate or expose residents to ambient noise levels; however, the following General Plan policies and actions was determined to reduce noise impacts to less than significant:

- PlanWC Policy P6.27: Minimize the noise impacts of transportation facilities and improvements.
- PlanWC Action A6.27a: Continue to encourage the enforcement of regulations such as the State Vehicle Code noise standards for automobiles, trucks, and motorcycles operating within the City.

**Noise and Vibration Topical Information.** Noise is an unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. The standard unit of measurement for noise is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. The noise analysis discusses sound levels in terms of Equivalent Noise Level ( $L_{eq}$ ).  $L_{eq}$  is the average noise level on an energy basis for any specific time period. The  $L_{eq}$  for one hour is the energy average noise level during the hour. The average noise level is based on the energy

content (acoustic energy) of the sound.  $L_{eq}$  can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level.  $L_{50}$  is the noise level for 30 minutes within any hour. The  $L_{eq}$  is expressed in units of dBA. Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and may evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness and would likely cause a negative community reaction.

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as rock blasting, pile driving, and heavy earth-moving equipment. High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of vibration may damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS.

**Regulatory Framework.** To implement the City's noise policies, the City adopted a Noise Ordinance. West Covina's Noise Ordinance (Article IV of Chapter 15 of the City's Ordinance Code) states that it is the City's policy to regulate and control annoying noise levels from all sources, and prohibits loud, unnecessary or unusual noise that unreasonably disturbs the peace and quiet of any residential neighborhood or that causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. The Noise Ordinance states that, if noise is plainly audible at a distance of 50 feet from the property line of any property, unit, building, structure or vehicle in which it is located, it shall be presumed that the noise being created is in violation. The Noise Ordinance also contains provisions regulating particular nuisance noise sources, such as repairing, rebuilding, or testing of any motor vehicles on private property, and the operation of two- and four-stroke engines. Any noise from these sources that exceed ambient noise levels by 5 decibels or more is considered a noise violation.

Section 15-95 of the Noise Ordinance prohibits any construction activities between the hours of 8:00 p.m. and 7:00 a.m. (or 6:00 a.m. for unloading and loading activities) within a residential zone, or within a radius of 500 feet therefrom, that causes the noise level at the property line to exceed the ambient noise level (defined as the all-encompassing noise associated with a given environment) by more than 5 decibels, unless a permit to do so has been obtained from the City, or in the case of emergency work as defined in the Noise Ordinance.

**Existing Setting.** The surrounding area is mostly commercial-use structures with a multi-family residential structure located to the north of the project site. Adjacent to project site on the east and west are commercial-use structures. Sensitive receptors are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. They typically include residences, schools, hospitals, guest lodging, and libraries. **Table 9** and identifies sensitive receptors near the project site.



| TABLE 9: SENSITIVE RECEPTORS        |                                   |
|-------------------------------------|-----------------------------------|
| Sensitive Receptor                  | Distance from Project Site (Feet) |
| The Colony at the Lakes Apartments  | 70                                |
| East Valley Community Health Center | 325                               |
| Residences along Blue Ash Road      | 510                               |
| Residences along Bandy Ave.         | 535                               |
| SOURCE: TAHA, 2023.                 |                                   |

Noise measurements were taken using a SoundPro DL Sound Level Meter To characterize the existing noise environment. Short-term noise measurements in 15-minute increments were conducted on Thursday, November 17, 2022 from 11:00 a.m. to 1:00 p.m. This time of day represents a typical construction time without the added noise source of peak hour traffic. Monitoring locations are shown in **Table 10** and **Figure 10**. Short-term monitored noise levels ranged from 52.2 to 70.0 dBA  $L_{eq}$ . Traffic noise along nearby roadways was the primary sources of noise in the project area.

| TABLE 10: EXISTING AMBIENT NOISE LEVELS |                                       |                              |
|-----------------------------------------|---------------------------------------|------------------------------|
| Noise Measurement Site (Figure 10)      | Noise Monitoring Location             | Noise Level (dBA, $L_{eq}$ ) |
| 1                                       | Blue Ash Road and Sandy Hook Street   | 52.2                         |
| 2                                       | The Colony at the Lakes Apartments    | 57.6                         |
| 3                                       | East Valley Community Health Center   | 59.9                         |
| 4                                       | Bandy Avenue and Walnut Creek Parkway | 54.0                         |
| 5                                       | Valinda Avenue and Waverly Place      | 70.0                         |
| SOURCE: TAHA, 2023.                     |                                       |                              |

### Project-Specific Impacts

Noise and Vibration Calculations conducted for the proposed project are included in Appendix B.

- a) **Would the project generate 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?**

**Construction.** The GPU EIR acknowledged the potential for temporary construction noise impacts, but concluded that such impacts resulting from development under the GPU and Downtown Plan would be less than significant with adherence to policies in the GPU and the City's Noise Ordinance. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to construction noise.

Construction activity would result in temporary increases in ambient noise levels in the area surrounding the project site on an intermittent basis. Noise levels from the construction of the proposed project would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities typically require the use of numerous pieces of noise-generating equipment.



Source: TAHA, 2023.



Typical noise levels from various types of equipment that would be used during construction are listed in **Table 11**. Noise levels would typically range from 73.7 to 80.4 dBA  $L_{eq}$  for each phase. **Table 12** shows anticipated noise levels at sensitive receptors. Similar to the conclusion in the GPU EIR, construction noise would exceed ambient noise levels and may cause temporary disturbance at neighboring properties.

| <b>TABLE 11: PHASED CONSTRUCTION NOISE LEVELS</b>           |                                     |
|-------------------------------------------------------------|-------------------------------------|
| <b>Construction Equipment</b>                               | <b>Noise Level at 50 feet (dBA)</b> |
| <b>DEMOLITION</b>                                           |                                     |
| Concrete Saw                                                | 82.6                                |
| Backhoe/Loader                                              | 73.6                                |
| Rubber Tired Dozer                                          | 77.7                                |
| <b>Demolition Combined</b>                                  | <b>79.1</b>                         |
| <b>SITE PREPARATION</b>                                     |                                     |
| Backhoe/Loader                                              | 73.7                                |
| Excavator                                                   | 76.7                                |
| Rubber Tired Dozer                                          | 77.7                                |
| <b>Site Preparation Combined</b>                            | <b>80.2</b>                         |
| <b>Building Construction</b>                                |                                     |
| Backhoe/Loader                                              | 73.7                                |
| Forklift                                                    | 79.4                                |
| Welder                                                      | 70.0                                |
| <b>Building Construction Combined</b>                       | <b>80.4</b>                         |
| <b>Architectural Coating</b>                                |                                     |
| Air Compressor                                              | 73.7                                |
| <b>Architectural Coating Combined</b>                       | <b>73.7</b>                         |
| <b>SOURCE: FHWA, Roadway Construction Noise Model, 2008</b> |                                     |

| <b>TABLE 12: CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS</b>                          |                        |                                        |                                    |                                                          |                                                    |
|--------------------------------------------------------------------------------------------|------------------------|----------------------------------------|------------------------------------|----------------------------------------------------------|----------------------------------------------------|
| <b>Sensitive Receptor</b>                                                                  | <b>Distance (feet)</b> | <b>Intervening Building <i>1a/</i></b> | <b>Reference Noise Level (dBA)</b> | <b>Max Construction Noise (dBA, <math>L_{eq}</math>)</b> | <b>Existing Ambient (dBA, <math>L_{eq}</math>)</b> |
| The Colony at the Lakes Apartments                                                         | 70                     | 0.0                                    | 80.2                               | 77.3                                                     | 57.6                                               |
| East Valley Community Health Center                                                        | 325                    | 4.5                                    | 80.2                               | 59.4                                                     | 59.9                                               |
| Residences along Blue Ash Rd.                                                              | 510                    | 0.0                                    | 80.2                               | 60.0                                                     | 52.2                                               |
| Residences along Bandy Ave.                                                                | 535                    | 6.0                                    | 80.2                               | 53.6                                                     | 54.0                                               |
| <i>1a/</i> -4.5 dB for on intervening row of buildings and -1.5 dB for each subsequent row |                        |                                        |                                    |                                                          |                                                    |
| <b>SOURCE: TAHA, 2023.</b>                                                                 |                        |                                        |                                    |                                                          |                                                    |

Section 15-95(a) of the City's Noise Ordinance prohibits construction activities between the hours of 8:00 p.m. and 7:00 a.m. within 500 feet of a residential zone that would cause the noise level at the property line to exceed the ambient noise level by more than five dBA unless a permit has been obtained in accordance with Section 15-95(b), Enforcement of the Noise Ordinance. These requirements would provide protection from construction noise and reduce temporary construction impacts to a less than significant level by setting restrictions on when construction can occur, requiring noise attenuation on equipment exceeding specified noise levels, and other types of mitigation to reduce noise levels more than five decibels above ambient noise levels.

Therefore, although construction noise levels resulting from the project may periodically exceed the City's allowable exterior noise levels, these impacts would be less than significant due to the temporary and daytime nature of construction-related noise, and the proposed project would not result in a significant impact that was not previously identified in the GPU EIR.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to construction noise. The proposed project would not result in a peculiar construction noise impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce construction noise levels. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

**Operations.** The GPU EIR stated that implementation of City policies and actions would help ensure that noise sensitive projects proposed in noisy environments, and potential noise generating projects that potentially exceed acceptable standards, would be evaluated, and that appropriate sound attenuation techniques would be implemented on a case-by-case basis. Depending on the specific development project proposed and the location and source of noise, sound attenuation techniques may include site design to shield noise-sensitive uses from operational noise, special building standards to reduce interior noise or reduce noise attenuation from the building, or the use of barriers to reduce exterior noise. Implementation of existing and proposed policies, as well as existing regulatory requirements such as those in the WCMC, would reduce potential impacts to a less than significant level. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to construction noise.

Permanent sources of noise include on-road vehicles, mechanical equipment, and outdoor gathering spaces. The proposed project would generate approximately 344 net new daily vehicle trips, including 21 AM peak hour trips and 26 PM peak hour trips. Operational mobile noise was assessed using the FHWA Traffic Noise Model Version 3.1 (TNM 3.1).

**Table 13** shows modeled mobile noise levels for existing and future with project conditions. The maximum mobile source noise level increase would be 0.3 dBA,  $L_{eq}$ . CEQA does not define what noise level increase would be considered substantial. Typically, project-generated noise level increases of 3 dBA or greater would be considered significant where exterior noise levels would exceed the normally acceptable noise level standard. Where noise levels would remain at or below the normally acceptable noise level standard with the project, noise level increases of 5 dBA or greater would be considered significant. Therefore, the proposed project would result in a less-than-significant impact to sensitive receptors as related to mobile source noise.

**TABLE 13: ESTIMATED MOBILE SOURCE NOISE LEVELS**

| Roadway Segment                                                | Estimated dBA, L <sub>eq</sub> |                     |                      |
|----------------------------------------------------------------|--------------------------------|---------------------|----------------------|
|                                                                | Existing                       | Future With Project | Incremental Increase |
| West Covina Pkwy. between Sunset Ave. and Vincent Ave.         | 66.5                           | 66.6                | 0.1                  |
| Vincent Ave. between West Covina Pkwy. and I-10 Freeway        | 68.1                           | 68.1                | 0.0                  |
| Lakes Dr. between Vincent Ave. and Lakes Dr.                   | 60.7                           | 60.9                | 0.2                  |
| Walnut Creek Pkwy. between Vincent Ave. and Glendora Ave.      | 58.5                           | 58.8                | 0.3                  |
| Glendora Ave. between Walnut Creek Pkwy. and Lakes Dr.         | 63.9                           | 64.1                | 0.2                  |
| West Covina Pkwy. between Vincent Ave. and Glendora Ave.       | 66.6                           | 66.7                | 0.1                  |
| Glendora Ave. between West Covina Pkwy. and Walnut Creek Pkwy. | 63.2                           | 63.3                | 0.1                  |
| SOURCE: TAHA, 2023                                             |                                |                     |                      |

Operational stationary sources of noise would include mechanical equipment such as heating, ventilation, and air conditioning (HVAC) noise. HVAC equipment without muffling or enclosures typically generates a noise level of approximately 60 dBA at 50 feet. The WCMC nor the City's General Plan Noise Element have established quantitative noise thresholds regarding HVAC equipment. Per Section 26-568 of the WCMC, mechanical equipment, including HVAC systems, are required to be placed behind a parapet wall when located on a rooftop and fully enclosed when located at ground level. This would further reduce HVAC noise levels by 10 dBA or more, resulting in a noise level of approximately 50 dBA at 50 feet. HVAC equipment would be located on the northeastern corner of the rooftop and would be more than 80 feet away from the residences to the north and elevated above ground level. HVAC noise is not anticipated to be audible above existing traffic noise along Walnut Creek Parkway, which has an existing ambient noise level of 58.5 dBA L<sub>eq</sub>. Therefore, the proposed project would not result in a significant impact related to HVAC equipment.

The proposed project's outdoor courtyard/plaza, fire pits, and pool and amenities space would also be a source of stationary noise related to human speech. In social situations, people often talk at distances of approximately 3 to 13 feet. A typical voice level at this distance is approximately 60 dBA.<sup>28</sup> However, the conversational noise associated with the outdoor areas would not likely be audible above traffic along Walnut Creek Parkway. Therefore, the proposed project would not result in a significant impact related to conversational noise at the public courtyard and pool and spa.

The proposed project includes a total of 82 parking spaces in subterranean concrete levels. Sources of noise would include engines accelerating, doors slamming, car alarms, and people talking. The subterranean parking structure would not generate noise at the street level. Therefore, the proposed project would result in a less than significant impact related to parking noise.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to operational noise. The proposed project would not result in a peculiar operational noise impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce operational noise levels. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

<sup>28</sup>The Engineering Toolbox. *Voice Level and Distance*, [http://www.engineeringtoolbox.com/voice-level-d\\_938.html](http://www.engineeringtoolbox.com/voice-level-d_938.html).

**b) Would the proposed project result in the generation of excessive ground-borne vibration or ground-borne noise levels?**

**Construction.** Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The City has not adopted any thresholds or regulations addressing vibration. Multi-family residential construction is not typically associated with the generation of substantial vibration. Certain types of construction equipment generate substantial levels of vibration. However, pile drivers or oversized earth moving equipment, which have particularly high levels of vibration impact, would not be used to construct the proposed project. As construction of the outer shell of the buildings progress, construction activity would be primarily contained in the building itself, and the likelihood of utilizing bulldozers and jackhammers decreases. It would still be anticipated that trucks would bring construction materials to the site, which may periodically generate vibration that would be felt by nearby receptors. However, vibration associated with construction vehicles would not be continuous. There are no extremely fragile historic buildings located in the immediate vicinity of the project site that could be damaged by construction activities.

Construction would be temporary and restricted to daytime hours between 7:00 AM and 8:00 PM, in accordance with the City's Noise Ordinance. Vibration would not occur during recognized sleep hours for nearby residents. Because vibration would be a temporary impact during construction, would not occur during normal sleep hours, and would not occur for the duration of project operation, impacts would be less than significant for residential receptors. Therefore, vibration impacts from project construction would be less than significant, and the project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Operations.** The residential development would not include a significant source of permanent vibration. Project-related vehicle trips could generate vibration, although similar to the existing condition, roadway vibration from passenger vehicles would not be perceptible outside of the roadway right-of-way. Therefore, no impact would occur related to operational vibration. The proposed project would not result in a peculiar operational vibration impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce operational vibration levels. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

**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?**

The GPU EIR concluded that airport noise exposure would not result in significant impacts. The following analysis demonstrates that the proposed project would be consistent with the GPU EIR Findings related to airport noise.

The GPU EIR stated that the City is located well beyond the two-mile distance for addressing noise from the nearest airport. The nearest airports or airfields are San Gabriel Valley Airport (formerly El Monte Airport), which is approximately seven miles northwest in the City of El Monte, and Brackett Field Airport, which is approximately 12 miles west in the City of La Verne. There is no potential to expose people working or residing in the area to excessive aircraft noise. The proposed project would not result in a significant impact that was not previously identified in the GPU EIR.

Similar to the GPU EIR, the proposed project would result in a less-than-significant impact related to airport noise. The proposed project would not result in a peculiar airport noise impact that was not assessed in the GPU EIR. No new mitigation measures are needed to reduce airport noise levels. The proposed project would not result in any new or substantially increased significant impacts beyond those disclosed in the GPU EIR.

## **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Noise found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Noise.

|                                                                                                                                                                                                          | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.14 POPULATION AND HOUSING.</b> <i>Would the project:</i>                                                                                                                                            |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Induce substantial 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)? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?                                                                          | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts related to population and housing on pages 217 through 224. Development facilitated by implementation of the GPU is projected to result in approximately 2,100 additional residential units in the City through 2035. Based on West Covina's estimated average household size of 3.41 persons, this would lead to an increase of approximately 7,161 residents. Therefore, future residential growth facilitated by the implementation of the GPU would increase the City's 2016 population of 107,873 to 115,034, which is below SCAG's 2040 population forecasts of 116,700. The GPU EIR concluded that population growth would not exceed anticipated forecasts, substantial growth would not occur, and GPU-related impacts to population and housing would be less than significant. No mitigation measures were required or identified.

### Project Specific Impacts

- a) **Would the project induce substantial 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)?**

The proposed project would construct a 51-unit multi-family apartment building that is currently occupied with a 95-stall surface parking lot. Based on West Covina's estimated average household size of 3.41 persons as stated in the GPU EIR, this would lead to an increase of approximately 174 residents. Based on the GPU EIR's growth projections of 7,161 persons between 2012 to 2016, the 174 new residents accommodated by the project would account for 2.4 percent of this projected population increase. Therefore, the project would result in a citywide population of approximately 115,208 persons (115,034 + 174). The increase in population associated with the project would be within the SCAG's 2012 to 2040 population projections. As discussed in the CEQA Exemption Checklist Question 3.3(a), the proposed 0.98-acre infill development has no potential to interfere with regional and City growth projections, which are orders of magnitude greater than the population, housing, and employment numbers associated with the proposed project. Therefore, project impacts would be less than significant, and the project would not result in an adverse impact that was not previously identified in the GPU EIR. Furthermore, the proposed project would not include the addition of roads or any other



type of infrastructure. Therefore, impacts related to population growth would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site is currently occupied by a 95-stall surface parking lot. The proposed project would demolish this existing parking lot and construct a 51-unit multi-family apartment building. No housing is currently located on the project site. Thus, no housing or people would be displaced as a result of the proposed project. Therefore, no impact related to displacement would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Population and Housing found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Population and Housing.

|                                                                                                                                                                                                          | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.15 PUBLIC SERVICES.</b> <i>Would the project:</i>                                                                                                                                                   |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Induce substantial 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)? |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| i) Fire protection?                                                                                                                                                                                      | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| ii) Police protection?                                                                                                                                                                                   | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| iii) Schools?                                                                                                                                                                                            | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| iv) Parks?                                                                                                                                                                                               | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| v) Other public facilities?                                                                                                                                                                              | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts related to public services on pages 225 through 242. As previously discussed, the implementation of the GPU would increase the City's population to 115,034 by 2040. The GPU EIR discusses impacts to fire protection, police protection, schools, parks, and library facilities. Impacts from intensified development under the GPU were determined to be less than significant for fire protection, police protection, schools, and libraries. Impacts to Parks were discussed in Section 15, Recreation, of the GPU EIR. Section 18, Utilities and Service Systems, contains analysis of project impacts on water, wastewater infrastructure, and solid waste collection and disposal. The GPU EIR does not contain analysis of other public services.

#### Project Specific Impacts

**a.i-v) Would the project induce substantial 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)?**

**Fire Projection.** The West Covina Fire Department (WCFD) provides fire protection and paramedic services to residents and businesses within the City. According to the GPU EIR, the WCFD currently has 77 professionals and 6 volunteer workers, and in 2016, the average response times were 5:17 for medical emergencies and 5:56 for fire related emergencies. West Covina Fire Station No. 1, located approximately 0.8 mile southwest of the project site at 819 South Sunset Avenue, is the closest fire station to the project site. The project site is within 2.5 "road miles" of this fire station, which would ensure a maximum response time of five minutes or less.

The proposed project would increase daytime population on the project site from approximately 174 new residents, which would generate a long-term demand for fire protection and emergency services provided by WCFD. However, this demand is not anticipated to cause WCFD to construct a new fire station to maintain its level of service

because the proposed project would be in a close proximity to Fire Station No. 1. Additionally, the proposed project would be constructed in compliance with the requirements of the City's Fire Code (Article II of the WCMC), which would require that there is adequate fire flow serving the project site, fire prevention and suppression measures, fire access, and number of hydrants. Furthermore, the applicant would be required to submit proposed project plans to WCFD and incorporate WCFD fire protection and suppression features that are appropriate for the proposed project. Compliance with the City's Fire Code and the inclusion of the WCFD fire prevention measures would ensure that the operation of the proposed project would not cause the WCFD to expand the existing Fire Station 1, or any other fire stations within the City. Project construction may generate traffic associated with the movement of construction equipment, removal of demolition and excavation materials, and construction worker trips. Flammable materials and liquids may also be present during construction. Moreover, temporary lane closures on adjacent streets may occur for utility improvements, staging, and other construction activities. Construction activities are temporary and would not involve the closure of an entire street. Emergency access would remain available along all surrounding streets. Additionally, per Section 17-402 of the WCMC, the project applicant would be required to pay a development impact fee to cover the costs associated with the project's impacts related to fire facilities. Therefore, impacts related to fire protection services would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Police Protection.** The West Covina Police Department (WCPD) provides police protection services to residents and businesses within the City of West Covina. WCPD headquarters is located at 1444 West Garvey Avenue (approximately 0.65 miles west of the project site). WCPD has organized the City into four service areas. The project site is located in Service Area No. 3.

The proposed project would increase residential population on the project site by 174 persons, which would potentially increase the demand for police protection services provided by WCPD. However, this potential increase in police protection services is not anticipated to cause WCPD to construct a new police station or expand the existing WCPD police headquarters to maintain its level of service because the proposed project would be in a close proximity to WCPD headquarters. Any potential increase in police protection services would be met by the deployment of additional officers at WCPD and/or increased patrols within the vicinity of the project site. In addition, the proposed project site plans would be submitted to the WCPD Crime Prevention unit for review and appropriate on-site security features would be required by WCPD. On-site security features could include, but would not be limited to, security cameras and security lighting, that would reduce the demand for police services. The inclusion of these security measures into the construction of the proposed project is anticipated to reduce the any potential increased number for calls for service, the need to deploy additional police officers, and/or increased patrols within the vicinity of the project site. Additionally, per Section 17-402 of the WCMC, the project applicant would be required to pay a development impact fee to cover the costs associated with the project's impacts related to police protection facilities.

Project construction may generate traffic associated with the movement of construction equipment, removal of demolition and excavation materials, and construction worker trips. Temporary lane closures may occur on adjacent streets for utility improvements, staging, and other construction activities. Construction activities are temporary and would not involve the closure of an entire street. Emergency access would remain available along

all surrounding streets. Additionally, the project site perimeter would be fenced during construction. Therefore, impacts related to police protection services would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Schools.** The project site is located within the West Covina Unified School District (WCUSD). As explained in CEQA Exemption Checklist Question 3.13(a), the proposed project would increase the City's population by 174 persons, which is within the GPU EIR and SCAG RTP/SCS growth projections. Thus, the proposed project would not induce substantial population growth that would potentially increase the enrollment at WCUSD schools. The proposed project would not generate a demand for school facilities that would exceed the capacity of the school district. Additionally, pursuant to Section 65995 of the Government Code, the applicant would be required to pay developer school impact fees to WCUSD. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, impacts related to schools would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Parks.** The City of West Covina Community and Recreation Services Department (WCRSD) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The nearest park to the project site is Cameron Park, located approximately 0.57 miles to the southeast. As explained in Response to Exemption Checklist Question 3.13(a), the proposed project would directly result in a population growth of 174 persons, which would potentially increase the demand for park facilities provided by WCRSD. However, the proposed project would incorporate on-site recreational spaces, including a swimming pool and gymnasium, which future residents would be reasonably expected to utilize. Thus, the proposed project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities that would potentially contribute to any adverse deterioration. Additionally, per Section 17-204 of the WCMC, the project applicant would be required to pay a development impact fee established by resolution of the City Council to cover the cost of any potential impacts to park facilities. Therefore, the proposed project would not contribute to a noticeable increase in demand on recreational facilities and no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Other Public Facilities.** Other public facilities that could be affected by the proposed project include public libraries. The City is served by the Los Angeles County Public Library (LACPL). LACPL operates one public library, the West Covina Library, in the City. The West Covina Library is located at 1601 West Covina Parkway, approximately 0.83 miles from the project site. As explained in Response to Exemption Checklist Question 3.13(a), the proposed project would directly result in a population growth of 174 persons, which would potentially increase the demand for library services provided by LACPL. However, this potential increase in demand for library services is not anticipated to cause LACPL to construct a new library or expand the existing library to maintain its level of service because the proposed project would be in a close proximity to the West Covina Library. Thus, the proposed project would not increase the residential population in the area and would not increase demand for the library that would require LACPL to construct

a new library or expand the existing facility and/or services to accommodate the proposed project. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Public Services found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Public Services.

|                                                                                                                                                                                                                | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.16 RECREATION.</b> <i>Would the project:</i>                                                                                                                                                              |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts related to 243 through 249. The GPU EIR states that the City of West Covina has 501.5 acres of parks and open space, with 4.72 acres of park space per 1,000 residents spread across the City. Funding for park improvements and additions would be available through fees collected under the Quimby Act and other funds and would be expected to keep pace with population growth as it occurs under implementation of the GPU. The following PlanWC and Downtown Plan policies and actions were included in the GPU to ensure this impact would be less than significant:

- PlanWC Policy P8.1, Downtown Plan Policy P13.1: Encourage the distribution of a variety of park types and sizes throughout the City.
- PlanWC Action A8.1: Develop variety of new park types of different sizes and require them in new development.
- PlanWC Policy P8.4: Small and frequent open spaces should be dispersed throughout the neighborhood.
- Downtown Plan Action A13.4B: Update the impact fee schedule as necessary to ensure that Downtown development provides its fair share of parks facilities in the Downtown area.

### Project Specific Impacts

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

As stated in Section 4.13 of the GPU EIR, West Covina has 499 acres of parks and open space, with 4.63 acres of park space per 1,000 residents. As explained in Response to Exemption Checklist Question 3.14(a.iv) above, the proposed project would directly result

in a population growth of 174 persons, which would potentially increase the demand for park facilities provided by WCRSD. However, the proposed project would incorporate on-site recreational facilities, including a swimming pool and amenities, courtyard open space, a common room, and a gymnasium, which future residents are reasonably expected to utilize. Thus, although the proposed project would directly increase the local population, it is not anticipated substantially increase the use of existing neighborhood and regional parks or other recreational facilities that would potentially contribute to any adverse deterioration. Additionally, per Section 17-204 of the WCMC and Action 13.4B of the Downtown Plan, the project applicant would be required to pay a development impact fee established by resolution of the City Council to cover the cost of any potential impacts to parks and recreational facilities. Therefore, the proposed project would not contribute to a noticeable increase in demand of recreational facilities, nor require the construction or expansion of public recreational facilities, and no impact would occur. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Recreation found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Recreation.

|                                                                                                                                                                  | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.17 TRANSPORTATION.</b> <i>Would the project:</i>                                                                                                            |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?          | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |
| b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?                                                                                  | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| d) Result in inadequate emergency access?                                                                                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses transportation and circulation impacts on pages 251 through 264. The GPU EIR concluded that impacts related to conflicts with transportation plans, ordinances, policies, or congestion management programs; air traffic patterns, and conflict with alternative transportation policies would be less than significant.

The following General Plan policy was amended and added to the GPU EIR as Mitigation Measure T-3 to reduce project impacts related to traffic-related hazards to less than significant levels:

- PlanWC Policy A6.27e: The City shall partner with adjacent cities and other jurisdictions and the private sector to seek and secure funding for railroad safety improvements, including securing rail right-of-way, and developing “Quiet Zones”, grade separations, and/or other safety projects for at-grade rail crossings at the intersection of Azusa Canyon Road and Los Angeles Street and on Fairway Drive at Valley Boulevard.

The following policies were included in the GPU to ensure impacts to related to transportation and circulation would be less than significant:

- PlanWC Policy P4.2: Accommodate multimodal mobility, accessibility and safety needs when planning, designing, and implementing transportation improvements, improving access and circulation for all users of City streets.
- PlanWC Policy P4.3: Establish protection of human life and health as the highest transportation system priorities, and seek to improve safety through the design and maintenance of streets, sidewalks, intersections and crosswalks.
- PlanWC Policy A4.4a: Ensure that pedestrians, bicyclists, transit vehicles and automobiles each have space in the right-of-way that is consistent with the street's designated mobility function and land use context per street typologies and modal-priority overlays as defined in the Thoroughfares Plan.



- PlanWC Policy A4.12b: Use SCAG GIS data to develop emergency planning and response strategies for the transportation system.

### Project Specific Impacts

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

Consistent with GPU Mitigation Measure T-1(c), which requires a Traffic Impact Study for proposed projects generating more than 100 vehicle trips per day, a Traffic Assessment for the proposed project was prepared by AGA Engineers, Inc. in November 2022, which is included in Appendix C. Per the City of West Covina traffic impact analysis guidelines, a full traffic study (Level-of-Service (LOS) analysis) is required if the proposed project is expected to generate a net peak hour project trips of 50 AM or PM peak hour trips. The Traffic Impact Study concluded that the proposed project is expected to generate 21 AM peak hour trip and 26 pm peak hour trips which is below the minimum requirement of 50 peak hour trips. **Table 14** below shows the daily project trip generation.

Because the project would operate 24 hours a day, seven days a week, it is anticipated that many project-generated trips would occur outside of peak traffic periods. The proposed project would generate less than 50 AM or PM peak hour trip. Therefore, per City guidelines, a full traffic impact study with LOS analysis is not required for the proposed project. Therefore, a full traffic study was not required for the proposed project. Per City recommendations, the project applicant would develop a Construction Management Plan (CMP) in coordination with the City to ensure impacts to the surrounding street system are kept at minimum. The CMP should meet the City's policies and guidelines and also the standards established in the current California Manual on Uniform Traffic Control Devices (MUTCD), Work Area Traffic Control Handbook (WATCH) and California Temporary Traffic Control Handbook. The following considerations would be included in the CMB:

- Traffic control for any street closure, detour, or other disruption to traffic circulation.
- Identify the routes that construction vehicles will utilize for the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.), to access the site, traffic controls and detours, and proposed construction phasing plan for the project.
- Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.
- Require the Applicant to keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Applicant shall clean adjacent streets, as directed by the City Engineer (or representative of the City Engineer), of any material which may have been spilled, tracked, or blown onto adjacent streets or areas.
- Hauling or transport of oversize loads will be allowed between the hours of 9:00 a.m. and 3:00 p.m. only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport will be allowed during nighttime hours, weekends or Federal holidays. Page 7 of 8
- Use of local streets shall be prohibited.

| TABLE 14: PROPOSED PROJECT TRIP GENERATION                                                                                              |                     |       |                                       |                                       |                                       |                                       |                                       |                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|
| ITE TRIP GENERATION RATES /A/ – WEEKDAY                                                                                                 |                     |       |                                       |                                       |                                       |                                       |                                       |                                       |
| ITE Code – Land Use                                                                                                                     | Rate per            | Daily | AM Peak Hour (one hour between 7-9am) |                                       |                                       | PM Peak Hour (one hour between 4-6pm) |                                       |                                       |
|                                                                                                                                         |                     |       | In                                    | Out                                   | Total                                 | In                                    | Out                                   | Total                                 |
| ITE 220, Multifamily Housing (Low-Rise)                                                                                                 | DU – Dwelling Units | 6.74  | 0.096                                 | 0.304                                 | 0.400                                 | 0.321                                 | 0.189                                 | 0.510                                 |
| Percentages                                                                                                                             |                     | 100%  | 24%                                   | 76%                                   | 100%                                  | 63%                                   | 37%                                   | 100%                                  |
| PROJECT TRIP GENERATION /A/ – WEEKDAY                                                                                                   |                     |       |                                       |                                       |                                       |                                       |                                       |                                       |
| ITE Code – Land Use                                                                                                                     | Square Footage      | Daily | AM Peak Hour (one hour between 7-9am) | PM Peak Hour (one hour between 4-6pm) | AM Peak Hour (one hour between 7-9am) | PM Peak Hour (one hour between 4-6pm) | AM Peak Hour (one hour between 7-9am) | PM Peak Hour (one hour between 4-6pm) |
|                                                                                                                                         |                     |       | In                                    | Out                                   | In                                    | Out                                   | In                                    | Out                                   |
| Walnut Creek Pkwy Residential Project (ITE 220, Multifamily Housing (Low-Rise))                                                         | 51 DU               | 344   | 5                                     | 16                                    | 21                                    | 16                                    | 10                                    | 26                                    |
| Net New Project Trips                                                                                                                   |                     | 344   | 5                                     | 16                                    | 21                                    | 16                                    | 10                                    | 26                                    |
| /a/ Institute of Transportation Engineers (ITE), Trip Generation Manual, 11 <sup>th</sup> Edition<br>SOURCE: AGA Engineers, Inc., 2022. |                     |       |                                       |                                       |                                       |                                       |                                       |                                       |

- Haul trucks entering or exiting public streets shall at all times yield to public traffic.
- If hauling operations cause any damage to existing pavement, street, curb, and/or gutter along the haul route, the applicant will be fully responsible for repairs. The repairs shall be completed to the satisfaction of the City Engineer.
- All construction-related parking and staging of vehicles will be kept out of the adjacent public roadways and will occur on-site.
- This Plan shall meet standards established in the current California Manual on Uniform Traffic Control Devices (MUTCD) as well as City requirements.
- Traffic control plans should meet standards/guidelines per the Work Area Traffic Control Handbook (WATCH), California Temporary Traffic Control Handbook and/or policies provided by the City.

With implementation of the CMB, construction of the proposed project would reduce transportation impacts on the surrounding areas. Additionally, the transportation policies of PlanWC are designed to reduce VMT by supporting the “downtown first” infill development, and tying mixed-land uses and higher-density development to high-capacity corridor transit routes. The proposed project is an infill development located within half mile of a TPA route near downtown West Covina. The project site is well served by bus transit lines operated by Foothill Transit, and a major transit center is located at the Plaza at West Covina. A bus stop is located on Vincent Avenue, approximately 320 feet to the northwest of the project site. In addition, the City of West Covina operates local transit service (Go West Shuttle), which stops near the project site on Lakes Drive. The proposed project does not hinder the use of alternative transportation, as it is located within walking distance to several transit lines and to neighborhood and regional serving retail uses. The proposed project would not alter the public sidewalks surrounding the project site. No designated bicycle lanes are located in the vicinity of the project site and the proposed project would not affect any bicycle lanes. The proposed project would therefore be compatible with existing plans and policies pertaining to transportation and infill development. Impacts would be less than significant, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

SB 743 was enacted in 2013 to further the assessment of transportation impacts under CEQA, and in 2018 CEQA Guidelines were published that incorporate SB 743 by promulgating the use of VMT and VMT reductions as a significant threshold metric. CEQA Guidelines Section 15064.3(b) states that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. As of July 1, 2020, VMT evaluation is required in lieu of the LOS analysis. As stated in Response to Exemption Checklist Question 4.17(a), the proposed project is located within half mile of a TPA and is therefore exempt from a VMT analysis. Additionally, the proposed project does not have a FAR less than 0.75, provides parking required by the City and is not replacing affordable housing. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The proposed project would construct an ingress and egress driveway, allowing vehicles to enter the subterranean parking level from Walnut Creek Parkway. City staff requested a corner sight distance evaluation of the driveway utilizing guidelines from the American Association of State Highway and Transportation Officials (AASHTO) for vehicles exiting and entering the proposed project driveway onto Walnut Creek Parkway. Based on AASHTO corner sight distance requirements, a sight distance of 280 feet for vehicles exiting northbound left and a sight distance of 240 feet for vehicles exiting northbound right was utilized in the analysis.<sup>29</sup> Based on the analysis, the proposed project building could impact the corner sight distance for a motorist at the driveway, looking west. However, based on the Caltrans Highway Design Manual (HDM), where it states that corner sight distance is not to be utilized for an urban driveway, the minimum corner sight distance and stopping sight distance analyses show there is adequate sight distance for the proposed project driveway. For westbound vehicles on Walnut Creek Parkway turning left into the project driveway, there is adequate sight distance for a vehicle turning westbound left turn from Walnut Creek Parkway into the project driveway.

All access and circulation associated with the proposed project would be designed and constructed in conformance with all applicable City requirements. The proposed project would not include the construction of any new roads or the modification of any existing roads that would result in an increase in hazards due to a design feature. Additionally, at least one car should be able to queue on-site in front of the gate to wait while the gate opens. Vehicles will not be allowed to block the sidewalk or extend into the street to wait for the gate to open. The proposed project would include activities typical of multi-family housing and would not introduce incompatible land uses to the project site. Therefore, a less-than-significant impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**d) Would the project result in inadequate emergency access?**

Access to the project site is proposed via driveways on Walnut Creek Parkway. The proposed project would be designed to allow adequate emergency access to the project site in accordance with the City's driveway standards and WCFD requirements. The proposed project design would also be reviewed by the City and the Los Angeles County Fire Department (LACFD) during the City's plan review process to ensure all applicable requirements are met. The proposed project would not result in inadequate emergency access. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.

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<sup>29</sup>AGA Engineers, Inc. *Traffic Assessment for the Proposed 51-Unit Townhome Project at 658 Walnut Creek Parkway*. November 23, 2022.

2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The GPU EIR included Mitigation Measures T-1(a), T-1(b), T-1(c), and T-3 to address impacts to Transportation. With implementation of Mitigation Measure T-1(c), implementation of the GPU would not result in impacts that would exceed the City's traffic-related thresholds of significance. Implementation of PlanWC Policies A6.27e, P4.2, P4.3, A4.4a, and A4.12b would ensure all other potential project-related transportation impacts would be less than significant. No additional mitigation measures contained in the GPU EIR apply to transportation impacts.

|                                                                                                                                                                                                                                                                                                                                                                                                                                           | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.18 TRIBAL CULTURAL RESOURCES.</b> <i>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:</i> |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| 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)?                                                                                                                                                                                                                                               | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.                  | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | Yes                                                                           |

### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts related to tribal cultural resources under Section 4.4, Cultural Resources, on pages 98 through 108. The GPU EIR concludes that impacts to tribal cultural resources would be less than significant with mitigation incorporated. General Plan policies were amended or added as a result of the GPU EIR to reduce project impact on cultural resources, including tribal cultural resources:

- PlanWC Policy P7.7 (included as GPU EIR Mitigation Measure CR-2): Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and AB 52 and SB 18 for consultation with Native American tribes for development projects carried out within the City.
- PlanWC Action A7.7 (included as GPU EIR Mitigation Measure CR-2): Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

Native American outreach procedures were completed by the City for the GPU and Downtown Plan areas. The GPU EIR concludes that implementation of the GPU policies would ensure impacts to archaeological and Native American cultural resources would be less than significant.

### **Project Specific Impacts**

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

As discussed in Response to Checklist Question 3.5(a), the project site is currently utilized as a surface parking lot and is not listed in the California Register of Historic Resources or in a local register of historical resources. The project site is located in an urbanized area that has been previously disturbed. To date, no significant tribal cultural resources have been identified on the project site. The proposed project does not involve deep levels of excavation and, thus, is not expected to disturb native soil that may contain tribal cultural resources. Any project-related ground disturbing activities is not expected to disturb any undiscovered tribal cultural resources. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

### **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigate potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Cultural Resources, including Tribal Cultural Resources, found all impacts to be less than significant with the incorporation of Mitigation Measure CR-2. Mitigation Measure CR-2 was incorporated into the GPU as Policy P7.7 and Action A7.7. No additional mitigation measures contained in the GPU EIR apply to impacts to Cultural Resources, including Tribal Cultural Resources.

|                                                                                                                                                                                                                                                                                      | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.19 UTILITIES AND SERVICE SYSTEMS.</b>                                                                                                                                                                                                                                           | <i>Would the project:</i>                                                                                         |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| 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? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?                                                                                                                            | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?                                                  | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                                                                              | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?                                                                                                                                                                   | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

#### City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR Summary

The GPU EIR discusses impacts to utilities and services systems on pages 265 through 286. The GPU EIR addressed impacts related to water supply, wastewater, storm drain facilities, solid waste, electricity for streetlights, and natural gas. Discussions of efforts to reduce electricity consumption from nonrenewable resources are found in Section 4.6, Greenhouse Gas Emissions, of the GPU EIR. As discussed in Section 4.15, Utilities and Service Systems of the GPU EIR, the City's water supplies, wastewater treatment facilities, storm drain facilities, and landfills would be able to adequately accommodate the City's forecasted population growth and impacts to these facilities and their services would be less than significant. Furthermore, the GPU EIR found that all impacts related to water supply would be less than significant with required implementation of policies and actions, including the following:

- PlanWC Policy P5.7: Manage & develop safe, reliable, economical water supply for existing & planned new customers.
- PlanWC Action A5.7a: Reduce demand through water conservation techniques.



- PlanWC Action A5.7c: Set conditions of approval for each new development to ensure adequate water supply prior to occupancy.
  - Downtown Plan Policy P11.2: Promote best practices for water conservation, re-use, & retention as part of new construction, renovations, site improvements, and landscaping.

### Project Specific Impacts

- a) **Would the project 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?**

**Water.** Suburban Water Systems, which is part of the Southwest Water Company, supplies water to the project site and would serve the proposed project. The Suburban Water Systems water supply is comprised of groundwater (80 percent) and surface water (20 percent). Suburban Water Systems pumps groundwater from the San Gabriel and Central Groundwater Basins and treats and disinfects groundwater before distribution to water service customers. Surface water supplies are met by purchasing water from the Metropolitan Water District of Southern California (MWD), the Covina Irrigating Company, and the California Domestic Water Company.<sup>30</sup> Suburban Water Systems pumps and distributes approximately 56,000 acre-feet, or 18.3 billion gallons, of water annually.

The proposed project would result in an estimated water demand of approximately 4,634 gallons per day (gpd), including 4,427 gpd for indoor water consumption and 207 gpd for outdoor water consumption.<sup>31</sup> The proposed project would connect to existing City water lines. The estimated water demand of the proposed project would represent less-than-one percent of the amount that Suburban Water System pumps and distributes, which represent a nominal percent of the Suburban Water Supply Systems' available water supply. Prior to the issuance of the building permit, the applicant would be required to verify that the City's water system can accommodate the proposed project's fire flows and all potable water demand. The estimated water demand of the proposed project is not expected to exceed available supplies or the available capacity within the distribution infrastructure that would serve the project site. Adequate water supplies would be available to the proposed project, and less-than-significant impacts would occur.

**Wastewater Treatment.** Wastewater generated from the project site is collected by sewer pipelines that are maintained by the City. Wastewater collected by the City is then conveyed to the Sanitation Districts of Los Angeles County (LACSD) trunk sewer pipelines where wastewater is conveyed to the LACSD San Jose Creek Water Reclamation Plant (SJCWRP) and/or the Whittier Narrows Water Reclamation Plant (WNRP). The wastewater treatment operations of these two reclamation plants are subject to the water treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB).

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<sup>30</sup>Southwest Water Company. *Suburban Water Systems: About Our Water*, <https://www.swwc.com/suburban/about-our-water/>. Accessed November 16, 2022.

<sup>31</sup>California Air Pollution Officers Association. *California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3)*.

SJCWRP has a maximum permitted capacity of 100 million gallons of wastewater per day (MGD) and treats an average flow of 65.7 MGD, recycles over 60 MGD, which leaves an available capacity of 34.3 MGD.<sup>32</sup> WNRP has a capacity of 15 MGD and treats an average flow of 7.3 MGD, which leaves an available capacity of 7.7 MGD.<sup>33</sup> As stated above, the proposed project is estimated to consume 4,427 gpd for indoor water use.<sup>34</sup> Assuming that wastewater represents approximately 80 percent of indoor water consumption, the proposed project would result in an estimated average wastewater generation of approximately 3,542 gallons per day (gpd). Net wastewater generation of the proposed project would decrease the remaining capacity of SJCWRP and WNRP by less than 0.1 percent. Given the available capacity of SJCWRP and WNRP, both facilities would have adequate capacity to serve the proposed project. In addition, the proposed project would be subject to Section 406 of the LACSD Wastewater Ordinance, which prohibits and restricts all persons discharging wastewater into the LACSD sewerage system to discharge wastewater that may violate any requirements or permits of LACSD, including those of LARWQCB. The proposed project would also be subject to the LACSD Connection Fee Program. The Connection Fee Program is authorized by the California Health and Safety Code Sections 5400 to 5474 to charge a fee for the privilege of connection to the LACSD's Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. The connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. The proposed project would not cause SJCWRP and WNRP to exceed wastewater treatment requirements of the LARWQCB. Furthermore, the City would require the project applicant to complete a Sewer Survey, to be approved by the City Engineer prior to the issuance of permits, to determine the adequacy of the sewer system connections to the project site. Therefore, less-than-significant impacts related to wastewater would occur with the proposed project.

**Storm Water Drainage.** Existing stormwater runoff infrastructure on the project site conveys stormwater from the project site to City storm drains, where stormwater is then conveyed to the San Gabriel River and/or the Rio Hondo River. As discussed in CEQA Exemption Checklist Question 3.9 c-i), The majority of the project site is covered by impervious surfaces. Upon completion of the proposed project, the project site would continue to be covered with a similar amount of impervious surfaces. Currently, the project site drains to the north towards the existing storm drains in the adjacent street rights-of-way (ROWs). The proposed project would install landscaping along the 7-foot along at the west, south, and east property line as well as terraced landscaping along Walnut Creek Parkway. With implementation of the proposed project, surface water runoff will be directed towards these landscaping features, and the remaining runoff will be directed towards the existing storm drains on Walnut Creek Parkway. Through the installation of landscaping, overall runoff from the project site would decrease when compared to existing conditions. Therefore, the proposed project would not require the construction of new stormwater drainage facilities or the expansion of existing facilities. Impacts related to existing storm drain capacities would be less than significant.

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<sup>32</sup>LACSD. *San Jose Creek Water Reclamation Plant*, <https://lacsdba.prod.govaccess.org/services/wastewater-sewage/facilities/san-jose-creek-water-reclamation-plant>. Accessed November 16, 2022.

<sup>33</sup> LACSD. *Whittier Narrows Water Reclamation Plant*, <https://lacsdba.prod.govaccess.org/services/wastewater-sewage/facilities/whittier-narrows-water-reclamation-plant>. Accessed November 16, 2022.

<sup>34</sup>California Air Pollution Officers Association. *California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3)*.

**Electric Power.** Electricity would be provided to the project site by Southern California Edison (SCE). In 2015, SCE delivered more than 87 billion kWh of electricity to its service area.<sup>35</sup> In 2020, SCE energy sources consisted of 42 percent unspecified sources, 30.9 percent renewable sources, 15.2 percent natural gas, 3.3 percent hydroelectric, and 8.4 percent nuclear.<sup>36</sup> According to California Energy Commission (CEC) data, SCE customers consumed approximately 83,533 million kilowatt hours of electricity in 2020.<sup>37</sup> Electricity would be consumed during construction activities in the form of construction staging lighting and power for minor on-site equipment. Electricity use associated with operations of the proposed project include interior and exterior building lighting (including court lighting), HVAC systems, electronic equipment, machinery, refrigeration, appliances, and security systems. Operations of the 51-unit multi-family apartment building are estimated to generate approximately 186,958 kWh annually, which represents less than 0.1 percent of the total power SCE delivers.<sup>38</sup> Therefore, the proposed project would not require the construction of new electricity facilities or the expansion of existing facilities. Impacts related to electric power would be less than significant.

**Natural Gas.** The Southern California Gas Company (SoCal Gas) supplies natural gas to the City of West Covina via a series of pipelines. In 2020, SoCalGas customers consumed approximately 5,231 million therms of natural gas energy according to the CEC database.<sup>39</sup> According to Section 4.15 of the GPU EIR: “As a public utility, SoCal Gas is under the jurisdiction of the California Public Utilities Commission, as well as federal regulatory agencies...Gas facilities within West Covina could be installed, altered or abandoned as necessary without any significant impact on the environment.” Minimal levels of natural gas would be consumed during construction. Operations of the 51-unit apartment building would consume natural gas for common uses attributed to multi-family developments, including internal heating and cooking on gas top stoves, as well as the outdoor fire pit in the common space area. The proposed project is estimated to consume 566,449 therms of natural gas annually, which represents 0.1 percent of the total natural gas supplied to SoCal Gas’ service area.<sup>40</sup> Additionally, the proposed project would be subject to the County Green Building Standards and would be required to implement energy conservation measures to comply with the Green Building Standards. Therefore, the proposed project would not require the construction of new natural gas facilities or the expansion of existing facilities. Impacts related to natural gas would be less than significant.

**Telecommunications Facilities.** General telephone and electronic lines provide telecommunication services to the project site. The proposed project would construct a 51-unit multi-family apartment building and increase the residential population by 174 persons, which could increase the level of demand on local telecommunications providers. However, any work that may affect services to the existing telecommunications

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<sup>35</sup>Southern California Edison (SCE). *Who We Are*, <https://www.sce.com/about-us/who-we-are>. Accessed November 16, 2022.

<sup>36</sup>California Energy Commission (CEC). *2020 Power Content Label – Southern California Edison*, <https://www.energy.ca.gov/filebrowser/download/3902>. Accessed November 16, 2022.

<sup>37</sup>California Energy Commission (CEC). *Electricity Consumption by Entity*, <http://www.ecdms.energy.ca.gov/elecbyutil.aspx>. Accessed November 16, 2022.

<sup>38</sup>California Air Pollution Officers Association. *California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3)*.

<sup>39</sup>California Energy Commission (CEC). *Natural Gas Consumption by Entity*, <http://www.ecdms.energy.ca.gov/gasbyutil.aspx>. Accessed November 16, 2022.

<sup>40</sup>California Air Pollution Officers Association. *California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3)*.

lines would be coordinated with service providers. Therefore, the proposed project is not expected to require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts related to telecommunications facilities would be less than significant.

The proposed project would result in less than significant impacts to water, wastewater, storm drainage, electrical, natural gas, and telecommunications facilities, and no mitigation measures are required. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

Suburban Water Systems' Urban Water Management Plan (UWMP), most recently updated on June 30, 2021, is the long-term planning resource to ensure adequate water supplies are available to meet existing and future water needs. Section 5 of the UWMP contains policies of the water shortage contingency plan to respond to water supply shortages, which states that MWD modeling results show that Suburban Water Systems has 100 percent reliability for full-service demands through the year 2045 for all climatic conditions. Response to a future drought would follow the water use efficiency mandates of Tariff Rule No. 14.1 along with implementation of the appropriate stage of regional plans, such as MWD's Water Surplus Drought Management (WSDM) Plan as described later in this section.<sup>41</sup> As discussed in CEQA Exemption Checklist Question 3.18(a), the proposed project would not cause Suburban Water Systems to exceed water supply capacity requirements. Therefore, Suburban Water Systems has sufficient water supplies available to serve the project under all climatic conditions, and a less-than-significant impact would occur. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

As discussed in CEQA Exemption Checklist Question 3.18(a), the proposed project would not cause SJCWRP and WNRP to exceed wastewater treatment requirements of the LARWQCB, and impacts to wastewater treatment plants would be less than significant. As discussed in CEQA Exemption Checklist Question 3.13(a), the 174 new residents accommodated by the project would be well within the potential population increase envisioned in PlanWC and analyzed in the GPU EIR, these facilities would therefore accommodate wastewater generated from the proposed project. Additionally, the project applicant would be required to pay a sewer connection fee of \$2,670 per dwelling unit as per LACSD requirements. Therefore, the proposed project would not generate wastewater that would exceed the processing capacity of the existing wastewater treatment system, and a less-than-significant impact would occur. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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<sup>41</sup>Suburban Water Systems. 2020 Urban Water Management Plan. June 30, [https://www.swwc.com/wp-content/uploads/files/ca/conservation/uwmp/Suburban%20Final%202020%20UWMP\\_2021-06-30.pdf](https://www.swwc.com/wp-content/uploads/files/ca/conservation/uwmp/Suburban%20Final%202020%20UWMP_2021-06-30.pdf). Accessed November 16, 2022.

- d) **Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**
- e) **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

West Covina is served by Athens Services, which is a private waste hauler contracted by the City to provide solid waste collection and recycling services to residents and businesses. The City's solid waste disposal activities are required to be in compliant with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). AB 939 requires jurisdictions to meet the statewide goal to divert 25 percent and 50 percent of solid waste generated by year 1995 and 2000. Solid waste collected by Athens Services is not directly disposed of at landfills serving the City. Instead, solid waste collected by Athens Services is transported to the Athens Services-owned Materials Recovery Facility (MRF) in the City of Industry. Solid waste received at the MRF is sorted, and all recyclable materials found are removed and recycled. The remaining solid waste that cannot be recycled is sent to the Victorville Sanitary Landfill. The Victorville Sanitary Landfill has a max permitted throughput of 3,000 tons per day, a max permitted capacity of 93,400,000 cubic yards, and a remaining capacity of 79,400,000 cubic yards.<sup>42</sup> The proposed project is estimated to produce 12.7 tons of solid waste annually, or approximately 70 pounds of solid waste per day, which represent less than 0.1 percent of the permitted daily intake capacity at the Victorville Sanitary Landfill.<sup>43</sup> The proposed project can be adequately served by the City's solid waste provider, and less-than-significant impacts related to solid waste disposal would occur with the proposed project. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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<sup>42</sup>CalRecycle, *Facility/Site Summary Details: Victorville Sanitary Landfill*, <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652>, accessed November 16, 2022.

<sup>43</sup>California Air Pollution Officers Association, *California Emissions Estimator Model (CalEEMod, Version 2022.1.1.3)*.

## **Conclusion**

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Utilities and Service Systems found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Utilities and Service Systems.

|                                                                                                                                                                                                                                                                    | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.20 WILDFIRE.</b> <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>                                                                                                      |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?                                                                                                                                                                           | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                                        | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| 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?                                                                            | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

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The GPU EIR discusses impacts related to wildfires in Section 4.7, Hazards and Hazardous Materials, specifically under Impact HAZ-6. The GPU EIR concluded that impacts related to wildfires for the City would be less than significant. Policy P6.17 in Plan WC Chapter 6, Our Healthy and Safe Community, requires the City to take actions to reduce the potential for loss of life or property in high fire hazard areas. This policy would be implemented through several required actions, as shown below.

- A6.17a: Review and evaluate proposed land uses in extreme and high fire hazard areas for their vulnerability to fire and potential ignition sources.
- A6.17b: Prohibit the use of untreated shake roofs in areas of high and extreme fire hazard.
- A6.17c: Adopt special inspection criteria in those areas of extreme, high, and medium fire risk during critical fire season when the sustained wind velocity exceeds 25 miles per hour.
- A6.17d: Study the adoption of rigid inspection standards for off-road vehicles (such as muffler and spark arrestor controls) and closely control the usage of off-road vehicles during periods of high fire risk (such as “Santa Ana” wind events with low humidity and strong winds).
- A6.17e: Investigate water re-use programs in the hillside areas to aid in fire prevention.
- A6.17f: Work with homeowners and builders constructing homes in or adjacent to high and extreme fire risk areas to make all water in privately owned swimming pools in these areas accessible to fire trucks for use in onsite fire protection. This could be accomplished through the inclusion of suitable gates and driveways in both existing and proposed homes.

- A6.17g: Continue to support programs to reduce fire hazards from vegetation in areas of extreme to high fire risk. Such programs may take a variety of forms and would include current City weed and brush removal programs, as well as control and use of fire retardant plantings.

### Project Specific Impacts

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

The Board of Forestry and Fire Protection is a Governor-appointed body, whose mission is to lead California in developing policies and programs that serve the public interest in environmentally, economically and socially sustainable forest and rangeland management; and a fire protection system that protects and serves the people of the state. One of its statutory responsibilities are to provide direction and guidance to the Department of California of Forestry and Fire Protection (CAL FIRE). CAL FIRE's mission emphasizes the management and protection of California's natural resources; a goal that is accomplished through ongoing assessment and study of the State's natural resources and an extensive CAL FIRE Resource Management Program. CAL FIRE maintains a list of cities that are considered Very High Fire Hazard Severity Zones (VHFHSZ).<sup>44</sup> The City of West Covina is currently on the VHFHSZ list, however the project site is not located within a VHFHSZ. Additionally, CAL FIRE maintains a database containing Fire Hazard Severity Zones (FHSZ), which identifies State Responsibility Area and Local Responsibility Area (LRA). A search conducted found that the project site is not within a FHSZ. The nearest FHSZ is approximately 4.3 miles east of the project site, within the San Jose Hills. Furthermore, the proposed project would not affect or interfere with City's NHMP or evacuation routes, or emergency/disaster routes in the project area. Therefore, the proposed project would not impair an adopted emergency response plan or emergency evacuation plan, and no impact would occur. The proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

**b) Would the project 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?**

The City is a fully built-out urban environment with a relatively flat topography throughout. The project site and surrounding area is also relatively flat and located near the southern edge of the City that is urbanized and primarily developed with commercial and residential uses. Because southern California is generally a windstorm susceptible region, much of this region encounters winds capable of spreading wildfire and wildfire pollutants. However, areas that are especially susceptible to exacerbate such fire risks are those that receive high gusts of wind and are within a VHFHSZ or FHSZ and has been a historically burn area. As discussed above, the City is not on the VHFHSZ list, and the project area is not within an FHSZ and is not within a historic burn area. Thus, it is unlikely that the proposed project would expose project occupants to uncontrolled spread of a wildfire or the pollutant concentrations from wildfire. Furthermore, the City has the NHMP, which outlines procedures to mitigate natural hazard occurrences. Therefore, no impact would

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<sup>44</sup>California Department of Forestry and Fire Protection. *Cities for which CAL FIRE has made recommendations on Very High Fire Hazard Severity Zones (VHFHSZ)*, <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed November 16, 2022.



occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The proposed project consists of the development of an apartment building within an urban area and would not require additional installation or maintenance of roads, fuel breaks, emergency water sources, or power lines. Existing utilities would adequately serve the proposed project. Thus, the proposed project would not require installation or maintenance of associated structures that may exacerbate fire risk or that may require in temporary or ongoing impacts to the environment. Furthermore, the proposed project would adhere to relevant building design codes, including the State and City fire codes. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

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

The project site and surrounding area are located within an urban area surrounded primarily by residential and commercial uses. There are no slopes or hills that would potentially 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. Therefore, no impact would occur, and the proposed project would not result in an adverse impact that was not previously identified in the GPU EIR.

## Conclusion

Further environmental analysis is not required because:

1. No peculiar impacts that are not substantially mitigated have been identified as a result of the project or its site. Application of the uniformly applied GPU policies substantially mitigates potentially significant impacts to a level of less than significant.
2. There are no potentially significant impacts that were not analyzed as significant in the GPU EIR.
3. There are no potentially significant offsite and/or cumulative impacts that were not discussed by the GPU EIR.
4. No substantial new information has been identified that results in an impact that is more severe than anticipated by the GPU EIR.
5. The conclusion of the GPU EIR relating to Wildfires found all impacts to be less than significant. There are no mitigation measures contained in the GPU EIR that apply to impacts to Wildfires.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Project<br>Peculiar<br>Impact that is<br>not<br>Substantially<br>Mitigated by<br>Uniformly<br>Applied<br>Policies | Significant<br>Impact not<br>Analyzed<br>as<br>Significant<br>in the prior<br>EIR | Potentially<br>Significant<br>Offsite or<br>Cumulative<br>Impact not<br>Discussed<br>in the prior<br>EIR | Adverse<br>Impact More<br>Severe<br>based on<br>Substantial<br>New<br>Information | GPU EIR<br>Mitigation<br>Measures<br>apply to<br>this<br>Project<br>Yes or No |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>4.21 MANDATORY FINDINGS OF SIGNIFICANCE.</b> <i>Would the project:</i>                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   |                                                                                   |                                                                                                          |                                                                                   |                                                                               |
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| b) Does the project have impacts which are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).                                                                                              | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |
| c) Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/>                                                                                          | <input type="checkbox"/>                                                          | <input type="checkbox"/>                                                                                 | <input type="checkbox"/>                                                          | No                                                                            |

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

The preceding analyses conclude that no significant unmitigated impacts to the environment would occur under the proposed project. The project site is currently developed and is located within an urbanized area with commercial and residential uses. The project site does not support sensitive species. In addition, the proposed project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The proposed project would be required to comply with MBTA (see Response to Exemption Checklist Question 3.4(d)). Adherence to GPU Policies P1.6, A1.6b, P1.11, A1.11c, and P1.5 would ensure that impacts to biological resources would be less than significant. The proposed project would not eliminate important examples of major periods of California history or prehistory since no historic resources are located on the project site and construction activities associated with the proposed project are not expected to disturb

any undiscovered archaeological resources (See Section 3.5, Cultural Resources). The GPU EIR Mitigation Measure CR-2, incorporated into the PlanWC as Policy P7.7 and Action A7.7, would require development to minimize and fully mitigate the impacts to the resources through cooperation with the City and potentially impacted Native American tribes and organizations. Therefore, impacts would be less than significant.

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

As discussed throughout this document, the proposed project would have no impact or a less than significant impact with respect to all environmental issues. Some resource areas (i.e., agricultural, biological, mineral) were determined to have no impact relative to existing conditions; therefore, the project would not contribute to cumulative impacts for these areas. Other issues (e.g., geology, hazards and hazardous materials) are inherently site-specific in nature and an impact at one site does not create effects at another site. Additional population and employment that will result from the project are within that forecast in the 2016 General Plan Update and Downtown Plan and Code EIR. As such, cumulative impacts will be less than significant and the project would not result in an adverse impact that was not previously identified in the GPU EIR. Although projects may be constructed in the project site vicinity, the proposed project would not result in any significant impacts and would not contribute to any cumulative impacts with respect to construction-related traffic, noise, or air pollutant emissions or with respect to long-term impacts such as aesthetics. Therefore, less-than-significant impacts are expected.

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed throughout this document the proposed project would not result, either directly or indirectly, in adverse hazards related to air quality (Section 4.3), hazardous materials (Section 4.9) or noise (Section 4.13). While there would be temporary adverse impacts during construction related to noise and criteria air pollutant emissions, these impacts are temporary and would be reduced to less than significant impact levels through incorporation of existing State, SCAQMD, and City requirements (discussed in Sections 4.3 and 4.13). Based on the analysis in this Exemption Checklist, direct and indirect impacts to human beings as a result of implementing the project will be less than significant, and the project would not result in an adverse impact that was not previously identified in the GPU EIR.

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### 5.3 SOURCES CONSULTED

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## **APPENDIX A**

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### Air Quality Calculations

# Walnut Creek Apartments Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

| Data Field                  | Value                                  |
|-----------------------------|----------------------------------------|
| Project Name                | Walnut Creek Apartments                |
| Lead Agency                 | City of West Covina                    |
| Land Use Scale              | Project/site                           |
| Analysis Level for Defaults | County                                 |
| Windspeed (m/s)             | 1.80                                   |
| Precipitation (days)        | 22.4                                   |
| Location                    | 34.06834581755645, -117.92597401938141 |
| County                      | Los Angeles-South Coast                |
| City                        | West Covina                            |
| Air District                | South Coast AQMD                       |
| Air Basin                   | South Coast                            |
| TAZ                         | 4916                                   |
| EDFZ                        | 7                                      |
| Electric Utility            | Southern California Edison             |
| Gas Utility                 | Southern California Gas                |

## 1.2. Land Use Types

| Land Use Subtype               | Size | Unit          | Lot Acreage | Building Area (sq ft) | Landscape Area (sq ft) | Special Landscape Area (sq ft) | Population | Description |
|--------------------------------|------|---------------|-------------|-----------------------|------------------------|--------------------------------|------------|-------------|
| Apartments Mid Rise            | 51.0 | Dwelling Unit | 0.98        | 42,672                | 5,194                  | —                              | 174        | —           |
| Enclosed Parking with Elevator | 87.0 | Space         | 0.00        | 0.00                  | 0.00                   | —                              | —          | —           |



### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

| Sector       | #    | Measure Title                          |
|--------------|------|----------------------------------------|
| Construction | C-2* | Limit Heavy-Duty Diesel Vehicle Idling |
| Water        | W-7  | Adopt a Water Conservation Strategy    |

\* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

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

| Un/Mit.             | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O  | R    | CO2e  |
|---------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|------|------|-------|
| Daily, Summer (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Unmit.              | 0.94 | 9.21 | 5.45 | 8.88 | 0.01 | 0.22  | 0.36  | 0.58  | 0.20   | 0.09   | 0.29   | —    | 1,425 | 1,425 | 0.06 | 0.04 | 1.76 | 1,440 |
| Mit.                | 0.94 | 9.21 | 5.45 | 8.88 | 0.01 | 0.22  | 0.36  | 0.58  | 0.20   | 0.09   | 0.29   | —    | 1,425 | 1,425 | 0.06 | 0.04 | 1.76 | 1,440 |
| % Reduced           | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Daily, Winter (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Unmit.              | 1.15 | 0.79 | 13.8 | 10.1 | 0.06 | 0.27  | 2.09  | 2.36  | 0.26   | 0.57   | 0.83   | —    | 8,644 | 8,644 | 0.45 | 1.24 | 0.46 | 9,024 |
| Mit.                | 1.15 | 0.79 | 13.8 | 10.1 | 0.06 | 0.27  | 2.09  | 2.36  | 0.26   | 0.57   | 0.83   | —    | 8,644 | 8,644 | 0.45 | 1.24 | 0.46 | 9,024 |
| % Reduced           | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Average Daily (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Unmit.              | 0.45 | 1.09 | 3.04 | 4.07 | 0.01 | 0.10  | 0.25  | 0.36  | 0.10   | 0.06   | 0.16   | —    | 1,053 | 1,053 | 0.05 | 0.09 | 0.73 | 1,080 |
| Mit.                | 0.45 | 1.09 | 3.04 | 4.07 | 0.01 | 0.10  | 0.25  | 0.36  | 0.10   | 0.06   | 0.16   | —    | 1,053 | 1,053 | 0.05 | 0.09 | 0.73 | 1,080 |

|                         |      |      |      |      |         |      |      |      |      |      |      |   |     |     |      |      |      |     |
|-------------------------|------|------|------|------|---------|------|------|------|------|------|------|---|-----|-----|------|------|------|-----|
| % Reduced               | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —   | —   | —    | —    | —    | —   |
| Annual (Max)            | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —   | —   | —    | —    | —    | —   |
| Unmit.                  | 0.08 | 0.20 | 0.56 | 0.74 | < 0.005 | 0.02 | 0.05 | 0.07 | 0.02 | 0.01 | 0.03 | — | 174 | 174 | 0.01 | 0.01 | 0.12 | 179 |
| Mit.                    | 0.08 | 0.20 | 0.56 | 0.74 | < 0.005 | 0.02 | 0.05 | 0.07 | 0.02 | 0.01 | 0.03 | — | 174 | 174 | 0.01 | 0.01 | 0.12 | 179 |
| % Reduced               | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —   | —   | —    | —    | —    | —   |
| Exceeds (Daily Max)     | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —   | —   | —    | —    | —    | —   |
| Threshold               | —    | 75.0 | 100  | 550  | 150     | —    | —    | 150  | —    | —    | 55.0 | — | —   | —   | —    | —    | —    | —   |
| Unmit.                  | —    | No   | No   | No   | No      | —    | —    | No   | —    | —    | No   | — | —   | —   | —    | —    | —    | —   |
| Mit.                    | —    | No   | No   | No   | No      | —    | —    | No   | —    | —    | No   | — | —   | —   | —    | —    | —    | —   |
| Exceeds (Average Daily) | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —   | —   | —    | —    | —    | —   |
| Threshold               | —    | 75.0 | 100  | 550  | 150     | —    | —    | 150  | —    | —    | 55.0 | — | —   | —   | —    | —    | —    | —   |
| Unmit.                  | —    | No   | No   | No   | No      | —    | —    | No   | —    | —    | No   | — | —   | —   | —    | —    | —    | —   |
| Mit.                    | —    | No   | No   | No   | No      | —    | —    | No   | —    | —    | No   | — | —   | —   | —    | —    | —    | —   |

## 2.2. Construction Emissions by Year, Unmitigated

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

| Year                 | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O  | R    | CO2e  |
|----------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|------|------|-------|
| Daily - Summer (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| 2024                 | 0.94 | 9.21 | 5.45 | 8.88 | 0.01 | 0.22  | 0.36  | 0.58  | 0.20   | 0.09   | 0.29   | —    | 1,425 | 1,425 | 0.06 | 0.04 | 1.76 | 1,440 |

|                      |      |      |      |      |         |      |      |      |      |      |      |   |       |       |      |      |      |       |
|----------------------|------|------|------|------|---------|------|------|------|------|------|------|---|-------|-------|------|------|------|-------|
| Daily - Winter (Max) | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| 2024                 | 1.15 | 0.79 | 13.8 | 10.1 | 0.06    | 0.27 | 2.09 | 2.36 | 0.26 | 0.57 | 0.83 | — | 8,644 | 8,644 | 0.45 | 1.24 | 0.46 | 9,024 |
| Average Daily        | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| 2024                 | 0.45 | 1.09 | 3.04 | 4.07 | 0.01    | 0.10 | 0.25 | 0.36 | 0.10 | 0.06 | 0.16 | — | 1,053 | 1,053 | 0.05 | 0.09 | 0.73 | 1,080 |
| Annual               | —    | —    | —    | —    | —       | —    | —    | —    | —    | —    | —    | — | —     | —     | —    | —    | —    | —     |
| 2024                 | 0.08 | 0.20 | 0.56 | 0.74 | < 0.005 | 0.02 | 0.05 | 0.07 | 0.02 | 0.01 | 0.03 | — | 174   | 174   | 0.01 | 0.01 | 0.12 | 179   |

### 2.3. Construction Emissions by Year, Mitigated

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

| Year                 | TOG  | ROG  | NOx  | CO   | SO2     | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O  | R    | CO2e  |
|----------------------|------|------|------|------|---------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|------|------|-------|
| Daily - Summer (Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| 2024                 | 0.94 | 9.21 | 5.45 | 8.88 | 0.01    | 0.22  | 0.36  | 0.58  | 0.20   | 0.09   | 0.29   | —    | 1,425 | 1,425 | 0.06 | 0.04 | 1.76 | 1,440 |
| Daily - Winter (Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| 2024                 | 1.15 | 0.79 | 13.8 | 10.1 | 0.06    | 0.27  | 2.09  | 2.36  | 0.26   | 0.57   | 0.83   | —    | 8,644 | 8,644 | 0.45 | 1.24 | 0.46 | 9,024 |
| Average Daily        | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| 2024                 | 0.45 | 1.09 | 3.04 | 4.07 | 0.01    | 0.10  | 0.25  | 0.36  | 0.10   | 0.06   | 0.16   | —    | 1,053 | 1,053 | 0.05 | 0.09 | 0.73 | 1,080 |
| Annual               | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| 2024                 | 0.08 | 0.20 | 0.56 | 0.74 | < 0.005 | 0.02  | 0.05  | 0.07  | 0.02   | 0.01   | 0.03   | —    | 174   | 174   | 0.01 | 0.01 | 0.12 | 179   |

### 2.4. Operations Emissions Compared Against Thresholds

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

| Un/Mit. | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|---------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
|---------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|

|                     |      |      |      |      |         |         |      |      |         |      |      |      |        |        |      |      |      |        |
|---------------------|------|------|------|------|---------|---------|------|------|---------|------|------|------|--------|--------|------|------|------|--------|
| Daily, Summer (Max) | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 1.66 | 2.50 | 1.14 | 13.8 | 0.03    | 0.03    | 0.83 | 0.86 | 0.03    | 0.15 | 0.18 | 27.1 | 2,832  | 2,859  | 2.87 | 0.11 | 9.96 | 2,973  |
| Mit.                | 1.66 | 2.50 | 1.14 | 13.8 | 0.03    | 0.03    | 0.83 | 0.86 | 0.03    | 0.15 | 0.18 | 26.5 | 2,830  | 2,856  | 2.82 | 0.11 | 9.96 | 2,969  |
| % Reduced           | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | 2%   | < 0.5% | < 0.5% | 2%   | 1%   | —    | < 0.5% |
| Daily, Winter (Max) | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 1.37 | 2.22 | 1.21 | 10.1 | 0.02    | 0.03    | 0.83 | 0.86 | 0.03    | 0.15 | 0.17 | 27.1 | 2,720  | 2,747  | 2.88 | 0.11 | 0.56 | 2,854  |
| Mit.                | 1.37 | 2.22 | 1.21 | 10.1 | 0.02    | 0.03    | 0.83 | 0.86 | 0.03    | 0.15 | 0.17 | 26.5 | 2,718  | 2,745  | 2.82 | 0.11 | 0.56 | 2,849  |
| % Reduced           | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | 2%   | < 0.5% | < 0.5% | 2%   | 1%   | —    | < 0.5% |
| Average Daily (Max) | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 1.42 | 2.27 | 1.14 | 11.3 | 0.02    | 0.03    | 0.75 | 0.78 | 0.03    | 0.13 | 0.16 | 27.1 | 2,527  | 2,554  | 2.86 | 0.11 | 4.08 | 2,661  |
| Mit.                | 1.42 | 2.27 | 1.14 | 11.3 | 0.02    | 0.03    | 0.75 | 0.78 | 0.03    | 0.13 | 0.16 | 26.5 | 2,525  | 2,552  | 2.81 | 0.10 | 4.08 | 2,657  |
| % Reduced           | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | 2%   | < 0.5% | < 0.5% | 2%   | 1%   | —    | < 0.5% |
| Annual (Max)        | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | —    | —      | —      | —    | —    | —    | —      |
| Unmit.              | 0.26 | 0.41 | 0.21 | 2.07 | < 0.005 | < 0.005 | 0.14 | 0.14 | < 0.005 | 0.02 | 0.03 | 4.48 | 418    | 423    | 0.47 | 0.02 | 0.67 | 441    |
| Mit.                | 0.26 | 0.41 | 0.21 | 2.07 | < 0.005 | < 0.005 | 0.14 | 0.14 | < 0.005 | 0.02 | 0.03 | 4.39 | 418    | 422    | 0.46 | 0.02 | 0.67 | 440    |
| % Reduced           | —    | —    | —    | —    | —       | —       | —    | —    | —       | —    | —    | 2%   | < 0.5% | < 0.5% | 2%   | 1%   | —    | < 0.5% |

## 2.5. Operations Emissions by Sector, Unmitigated

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

| Sector | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|--------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
|--------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|

|                     |      |      |      |       |         |         |      |         |         |      |         |      |       |       |         |         |      |       |
|---------------------|------|------|------|-------|---------|---------|------|---------|---------|------|---------|------|-------|-------|---------|---------|------|-------|
| Daily, Summer (Max) | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile              | 1.37 | 1.24 | 0.97 | 10.9  | 0.02    | 0.02    | 0.83 | 0.85    | 0.01    | 0.15 | 0.16    | —    | 2,451 | 2,451 | 0.12    | 0.10    | 9.65 | 2,493 |
| Area                | 0.28 | 1.25 | 0.03 | 2.88  | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 7.74  | 7.74  | < 0.005 | < 0.005 | —    | 7.76  |
| Energy              | 0.02 | 0.01 | 0.14 | 0.06  | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | —    | 360   | 360   | 0.03    | < 0.005 | —    | 362   |
| Water               | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | 3.64 | 12.8  | 16.5  | 0.37    | 0.01    | —    | 28.5  |
| Waste               | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | 23.4 | 0.00  | 23.4  | 2.34    | 0.00    | —    | 82.0  |
| Refrig.             | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | 0.31 | 0.31  |
| Total               | 1.66 | 2.50 | 1.14 | 13.8  | 0.03    | 0.03    | 0.83 | 0.86    | 0.03    | 0.15 | 0.18    | 27.1 | 2,832 | 2,859 | 2.87    | 0.11    | 9.96 | 2,973 |
| Daily, Winter (Max) | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile              | 1.35 | 1.22 | 1.07 | 10.00 | 0.02    | 0.02    | 0.83 | 0.85    | 0.01    | 0.15 | 0.16    | —    | 2,347 | 2,347 | 0.13    | 0.10    | 0.25 | 2,381 |
| Area                | —    | 0.99 | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | —    | —     |
| Energy              | 0.02 | 0.01 | 0.14 | 0.06  | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | —    | 360   | 360   | 0.03    | < 0.005 | —    | 362   |
| Water               | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | 3.64 | 12.8  | 16.5  | 0.37    | 0.01    | —    | 28.5  |
| Waste               | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | 23.4 | 0.00  | 23.4  | 2.34    | 0.00    | —    | 82.0  |
| Refrig.             | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | 0.31 | 0.31  |
| Total               | 1.37 | 2.22 | 1.21 | 10.1  | 0.02    | 0.03    | 0.83 | 0.86    | 0.03    | 0.15 | 0.17    | 27.1 | 2,720 | 2,747 | 2.88    | 0.11    | 0.56 | 2,854 |
| Average Daily       | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile              | 1.21 | 1.10 | 0.98 | 9.29  | 0.02    | 0.01    | 0.75 | 0.77    | 0.01    | 0.13 | 0.15    | —    | 2,149 | 2,149 | 0.12    | 0.09    | 3.77 | 2,183 |
| Area                | 0.19 | 1.17 | 0.02 | 1.97  | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 5.30  | 5.30  | < 0.005 | < 0.005 | —    | 5.32  |
| Energy              | 0.02 | 0.01 | 0.14 | 0.06  | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | —    | 360   | 360   | 0.03    | < 0.005 | —    | 362   |
| Water               | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | 3.64 | 12.8  | 16.5  | 0.37    | 0.01    | —    | 28.5  |
| Waste               | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | 23.4 | 0.00  | 23.4  | 2.34    | 0.00    | —    | 82.0  |
| Refrig.             | —    | —    | —    | —     | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | 0.31 | 0.31  |
| Total               | 1.42 | 2.27 | 1.14 | 11.3  | 0.02    | 0.03    | 0.75 | 0.78    | 0.03    | 0.13 | 0.16    | 27.1 | 2,527 | 2,554 | 2.86    | 0.11    | 4.08 | 2,661 |

|         |         |         |         |      |         |         |      |         |         |      |         |      |      |      |         |         |      |      |
|---------|---------|---------|---------|------|---------|---------|------|---------|---------|------|---------|------|------|------|---------|---------|------|------|
| Annual  | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —    | —    | —       | —       | —    | —    |
| Mobile  | 0.22    | 0.20    | 0.18    | 1.69 | < 0.005 | < 0.005 | 0.14 | 0.14    | < 0.005 | 0.02 | 0.03    | —    | 356  | 356  | 0.02    | 0.02    | 0.62 | 362  |
| Area    | 0.03    | 0.21    | < 0.005 | 0.36 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 0.88 | 0.88 | < 0.005 | < 0.005 | —    | 0.88 |
| Energy  | < 0.005 | < 0.005 | 0.03    | 0.01 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 59.6 | 59.6 | 0.01    | < 0.005 | —    | 59.9 |
| Water   | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 0.60 | 2.12 | 2.72 | 0.06    | < 0.005 | —    | 4.72 |
| Waste   | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 3.88 | 0.00 | 3.88 | 0.39    | 0.00    | —    | 13.6 |
| Refrig. | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —    | —    | —       | —       | 0.05 | 0.05 |
| Total   | 0.26    | 0.41    | 0.21    | 2.07 | < 0.005 | < 0.005 | 0.14 | 0.14    | < 0.005 | 0.02 | 0.03    | 4.48 | 418  | 423  | 0.47    | 0.02    | 0.67 | 441  |

## 2.6. Operations Emissions by Sector, Mitigated

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

| Sector              | TOG  | ROG  | NOx  | CO    | SO2     | PM10E   | PM10D | PM10T   | PM2.5E  | PM2.5D | PM2.5T  | BCO2 | NBCO2 | CO2T  | CH4     | N2O     | R    | CO2e  |
|---------------------|------|------|------|-------|---------|---------|-------|---------|---------|--------|---------|------|-------|-------|---------|---------|------|-------|
| Daily, Summer (Max) | —    | —    | —    | —     | —       | —       | —     | —       | —       | —      | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile              | 1.37 | 1.24 | 0.97 | 10.9  | 0.02    | 0.02    | 0.83  | 0.85    | 0.01    | 0.15   | 0.16    | —    | 2,451 | 2,451 | 0.12    | 0.10    | 9.65 | 2,493 |
| Area                | 0.28 | 1.25 | 0.03 | 2.88  | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 7.74  | 7.74  | < 0.005 | < 0.005 | —    | 7.76  |
| Energy              | 0.02 | 0.01 | 0.14 | 0.06  | < 0.005 | 0.01    | —     | 0.01    | 0.01    | —      | 0.01    | —    | 360   | 360   | 0.03    | < 0.005 | —    | 362   |
| Water               | —    | —    | —    | —     | —       | —       | —     | —       | —       | —      | —       | 3.10 | 10.9  | 14.0  | 0.32    | 0.01    | —    | 24.2  |
| Waste               | —    | —    | —    | —     | —       | —       | —     | —       | —       | —      | —       | 23.4 | 0.00  | 23.4  | 2.34    | 0.00    | —    | 82.0  |
| Refrig.             | —    | —    | —    | —     | —       | —       | —     | —       | —       | —      | —       | —    | —     | —     | —       | —       | 0.31 | 0.31  |
| Total               | 1.66 | 2.50 | 1.14 | 13.8  | 0.03    | 0.03    | 0.83  | 0.86    | 0.03    | 0.15   | 0.18    | 26.5 | 2,830 | 2,856 | 2.82    | 0.11    | 9.96 | 2,969 |
| Daily, Winter (Max) | —    | —    | —    | —     | —       | —       | —     | —       | —       | —      | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile              | 1.35 | 1.22 | 1.07 | 10.00 | 0.02    | 0.02    | 0.83  | 0.85    | 0.01    | 0.15   | 0.16    | —    | 2,347 | 2,347 | 0.13    | 0.10    | 0.25 | 2,381 |
| Area                | —    | 0.99 | —    | —     | —       | —       | —     | —       | —       | —      | —       | —    | —     | —     | —       | —       | —    | —     |
| Energy              | 0.02 | 0.01 | 0.14 | 0.06  | < 0.005 | 0.01    | —     | 0.01    | 0.01    | —      | 0.01    | —    | 360   | 360   | 0.03    | < 0.005 | —    | 362   |
| Water               | —    | —    | —    | —     | —       | —       | —     | —       | —       | —      | —       | 3.10 | 10.9  | 14.0  | 0.32    | 0.01    | —    | 24.2  |

|               |         |         |         |      |         |         |      |         |         |      |         |      |       |       |         |         |      |       |
|---------------|---------|---------|---------|------|---------|---------|------|---------|---------|------|---------|------|-------|-------|---------|---------|------|-------|
| Waste         | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 23.4 | 0.00  | 23.4  | 2.34    | 0.00    | —    | 82.0  |
| Refrig.       | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | 0.31 | 0.31  |
| Total         | 1.37    | 2.22    | 1.21    | 10.1 | 0.02    | 0.03    | 0.83 | 0.86    | 0.03    | 0.15 | 0.17    | 26.5 | 2,718 | 2,745 | 2.82    | 0.11    | 0.56 | 2,849 |
| Average Daily | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile        | 1.21    | 1.10    | 0.98    | 9.29 | 0.02    | 0.01    | 0.75 | 0.77    | 0.01    | 0.13 | 0.15    | —    | 2,149 | 2,149 | 0.12    | 0.09    | 3.77 | 2,183 |
| Area          | 0.19    | 1.17    | 0.02    | 1.97 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 5.30  | 5.30  | < 0.005 | < 0.005 | —    | 5.32  |
| Energy        | 0.02    | 0.01    | 0.14    | 0.06 | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | —    | 360   | 360   | 0.03    | < 0.005 | —    | 362   |
| Water         | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 3.10 | 10.9  | 14.0  | 0.32    | 0.01    | —    | 24.2  |
| Waste         | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 23.4 | 0.00  | 23.4  | 2.34    | 0.00    | —    | 82.0  |
| Refrig.       | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | 0.31 | 0.31  |
| Total         | 1.42    | 2.27    | 1.14    | 11.3 | 0.02    | 0.03    | 0.75 | 0.78    | 0.03    | 0.13 | 0.16    | 26.5 | 2,525 | 2,552 | 2.81    | 0.10    | 4.08 | 2,657 |
| Annual        | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | —    | —     |
| Mobile        | 0.22    | 0.20    | 0.18    | 1.69 | < 0.005 | < 0.005 | 0.14 | 0.14    | < 0.005 | 0.02 | 0.03    | —    | 356   | 356   | 0.02    | 0.02    | 0.62 | 362   |
| Area          | 0.03    | 0.21    | < 0.005 | 0.36 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 0.88  | 0.88  | < 0.005 | < 0.005 | —    | 0.88  |
| Energy        | < 0.005 | < 0.005 | 0.03    | 0.01 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | —    | 59.6  | 59.6  | 0.01    | < 0.005 | —    | 59.9  |
| Water         | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 0.51 | 1.80  | 2.32  | 0.05    | < 0.005 | —    | 4.01  |
| Waste         | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | 3.88 | 0.00  | 3.88  | 0.39    | 0.00    | —    | 13.6  |
| Refrig.       | —       | —       | —       | —    | —       | —       | —    | —       | —       | —    | —       | —    | —     | —     | —       | —       | 0.05 | 0.05  |
| Total         | 0.26    | 0.41    | 0.21    | 2.07 | < 0.005 | < 0.005 | 0.14 | 0.14    | < 0.005 | 0.02 | 0.03    | 4.39 | 418   | 422   | 0.46    | 0.02    | 0.67 | 440   |

### 3. Construction Emissions Details

#### 3.1. Demolition (2024) - Unmitigated

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

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
| Onsite   | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | — | —    |

|                     |         |         |      |      |         |         |      |         |         |      |         |   |      |      |         |         |      |       |
|---------------------|---------|---------|------|------|---------|---------|------|---------|---------|------|---------|---|------|------|---------|---------|------|-------|
| Daily, Summer (Max) | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |
| Daily, Winter (Max) | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |
| Off-Road Equipment  | 0.68    | 0.57    | 5.29 | 6.75 | 0.01    | 0.21    | —    | 0.21    | 0.20    | —    | 0.20    | — | 997  | 997  | 0.04    | 0.01    | —    | 1,001 |
| Demolition          | —       | —       | —    | —    | —       | —       | 0.00 | 0.00    | —       | 0.00 | 0.00    | — | —    | —    | —       | —       | —    | —     |
| Onsite truck        | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00  |
| Average Daily       | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |
| Off-Road Equipment  | 0.02    | 0.02    | 0.14 | 0.18 | < 0.005 | 0.01    | —    | 0.01    | 0.01    | —    | 0.01    | — | 27.3 | 27.3 | < 0.005 | < 0.005 | —    | 27.4  |
| Demolition          | —       | —       | —    | —    | —       | —       | 0.00 | 0.00    | —       | 0.00 | 0.00    | — | —    | —    | —       | —       | —    | —     |
| Onsite truck        | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00  |
| Annual              | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |
| Off-Road Equipment  | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | — | 4.52 | 4.52 | < 0.005 | < 0.005 | —    | 4.54  |
| Demolition          | —       | —       | —    | —    | —       | —       | 0.00 | 0.00    | —       | 0.00 | 0.00    | — | —    | —    | —       | —       | —    | —     |
| Onsite truck        | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00  |
| Offsite             | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |
| Daily, Summer (Max) | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |
| Daily, Winter (Max) | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —     |



|               |         |         |         |         |         |         |         |         |         |         |         |   |      |      |         |         |         |      |
|---------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|---------|------|
| Worker        | 0.04    | 0.04    | 0.04    | 0.47    | 0.00    | 0.00    | 0.09    | 0.09    | 0.00    | 0.02    | 0.02    | — | 91.9 | 91.9 | < 0.005 | < 0.005 | 0.01    | 93.1 |
| Vendor        | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling       | 0.05    | 0.01    | 0.91    | 0.34    | < 0.005 | 0.01    | 0.18    | 0.19    | 0.01    | 0.05    | 0.06    | — | 698  | 698  | 0.04    | 0.11    | 0.04    | 733  |
| Average Daily | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker        | < 0.005 | < 0.005 | < 0.005 | 0.01    | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 2.55 | 2.55 | < 0.005 | < 0.005 | < 0.005 | 2.59 |
| Vendor        | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling       | < 0.005 | < 0.005 | 0.03    | 0.01    | < 0.005 | < 0.005 | < 0.005 | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 19.1 | 19.1 | < 0.005 | < 0.005 | 0.02    | 20.1 |
| Annual        | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker        | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 0.42 | 0.42 | < 0.005 | < 0.005 | < 0.005 | 0.43 |
| Vendor        | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling       | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 3.17 | 3.17 | < 0.005 | < 0.005 | < 0.005 | 3.33 |

### 3.2. Demolition (2024) - Mitigated

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

| Location            | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O  | R    | CO2e  |
|---------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|------|------|------|------|-------|
| Onsite              | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —     |
| Daily, Summer (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —     |
| Daily, Winter (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —     |
| Off-Road Equipment  | 0.68 | 0.57 | 5.29 | 6.75 | 0.01 | 0.21  | —     | 0.21  | 0.20   | —      | 0.20   | —    | 997   | 997  | 0.04 | 0.01 | —    | 1,001 |
| Demolition          | —    | —    | —    | —    | —    | —     | 0.00  | 0.00  | —      | 0.00   | 0.00   | —    | —     | —    | —    | —    | —    | —     |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00 | 0.00 | 0.00 | 0.00 | 0.00  |

|                     |         |         |         |         |         |         |         |         |         |         |         |   |      |      |         |         |         |      |
|---------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|---------|------|
| Average Daily       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Off-Road Equipment  | 0.02    | 0.02    | 0.14    | 0.18    | < 0.005 | 0.01    | —       | 0.01    | 0.01    | —       | 0.01    | — | 27.3 | 27.3 | < 0.005 | < 0.005 | —       | 27.4 |
| Demolition          | —       | —       | —       | —       | —       | —       | 0.00    | 0.00    | —       | 0.00    | 0.00    | — | —    | —    | —       | —       | —       | —    |
| Onsite truck        | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Annual              | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Off-Road Equipment  | < 0.005 | < 0.005 | 0.03    | 0.03    | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | —       | < 0.005 | — | 4.52 | 4.52 | < 0.005 | < 0.005 | —       | 4.54 |
| Demolition          | —       | —       | —       | —       | —       | —       | 0.00    | 0.00    | —       | 0.00    | 0.00    | — | —    | —    | —       | —       | —       | —    |
| Onsite truck        | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Offsite             | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Daily, Summer (Max) | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Daily, Winter (Max) | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | 0.04    | 0.04    | 0.04    | 0.47    | 0.00    | 0.00    | 0.09    | 0.09    | 0.00    | 0.02    | 0.02    | — | 91.9 | 91.9 | < 0.005 | < 0.005 | 0.01    | 93.1 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | 0.05    | 0.01    | 0.91    | 0.34    | < 0.005 | 0.01    | 0.18    | 0.19    | 0.01    | 0.05    | 0.06    | — | 698  | 698  | 0.04    | 0.11    | 0.04    | 733  |
| Average Daily       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | < 0.005 | < 0.005 | < 0.005 | 0.01    | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 2.55 | 2.55 | < 0.005 | < 0.005 | < 0.005 | 2.59 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | < 0.005 | < 0.005 | 0.03    | 0.01    | < 0.005 | < 0.005 | < 0.005 | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 19.1 | 19.1 | < 0.005 | < 0.005 | 0.02    | 20.1 |
| Annual              | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 0.42 | 0.42 | < 0.005 | < 0.005 | < 0.005 | 0.43 |

|         |         |         |         |         |         |         |         |         |         |         |         |   |      |      |         |         |         |      |
|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|---------|------|
| Vendor  | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 3.17 | 3.17 | < 0.005 | < 0.005 | < 0.005 | 3.33 |

### 3.3. Site Preparation (2024) - Unmitigated

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

| Location                    | TOG  | ROG  | NOx  | CO   | SO2     | PM10E | PM10D   | PM10T   | PM2.5E | PM2.5D  | PM2.5T  | BCO2 | NBCO2 | CO2T | CH4     | N2O     | R    | CO2e |
|-----------------------------|------|------|------|------|---------|-------|---------|---------|--------|---------|---------|------|-------|------|---------|---------|------|------|
| Onsite                      | —    | —    | —    | —    | —       | —     | —       | —       | —      | —       | —       | —    | —     | —    | —       | —       | —    | —    |
| Daily, Summer (Max)         | —    | —    | —    | —    | —       | —     | —       | —       | —      | —       | —       | —    | —     | —    | —       | —       | —    | —    |
| Daily, Winter (Max)         | —    | —    | —    | —    | —       | —     | —       | —       | —      | —       | —       | —    | —     | —    | —       | —       | —    | —    |
| Off-Road Equipment          | 0.54 | 0.45 | 3.86 | 6.06 | 0.01    | 0.18  | —       | 0.18    | 0.16   | —       | 0.16    | —    | 933   | 933  | 0.04    | 0.01    | —    | 937  |
| Dust From Material Movement | —    | —    | —    | —    | —       | —     | 0.01    | 0.01    | —      | < 0.005 | < 0.005 | —    | —     | —    | —       | —       | —    | —    |
| Onsite truck                | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00    | 0.00    | 0.00   | 0.00    | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Average Daily               | —    | —    | —    | —    | —       | —     | —       | —       | —      | —       | —       | —    | —     | —    | —       | —       | —    | —    |
| Off-Road Equipment          | 0.03 | 0.02 | 0.21 | 0.33 | < 0.005 | 0.01  | —       | 0.01    | 0.01   | —       | 0.01    | —    | 51.1  | 51.1 | < 0.005 | < 0.005 | —    | 51.3 |
| Dust From Material Movement | —    | —    | —    | —    | —       | —     | < 0.005 | < 0.005 | —      | < 0.005 | < 0.005 | —    | —     | —    | —       | —       | —    | —    |
| Onsite truck                | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00    | 0.00    | 0.00   | 0.00    | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                      | —    | —    | —    | —    | —       | —     | —       | —       | —      | —       | —       | —    | —     | —    | —       | —       | —    | —    |

|                             |         |         |         |         |         |         |         |         |         |         |         |   |       |       |         |         |         |       |
|-----------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Off-Road Equipment          | 0.01    | < 0.005 | 0.04    | 0.06    | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | —       | < 0.005 | — | 8.47  | 8.47  | < 0.005 | < 0.005 | —       | 8.50  |
| Dust From Material Movement | —       | —       | —       | —       | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —     | —     | —       | —       | —       | —     |
| Onsite truck                | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Offsite                     | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Summer (Max)         | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Winter (Max)         | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | 0.03    | 0.03    | 0.03    | 0.35    | 0.00    | 0.00    | 0.07    | 0.07    | 0.00    | 0.02    | 0.02    | — | 68.9  | 68.9  | < 0.005 | < 0.005 | 0.01    | 69.8  |
| Vendor                      | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Hauling                     | 0.57    | 0.16    | 9.92    | 3.67    | 0.05    | 0.10    | 2.01    | 2.10    | 0.10    | 0.55    | 0.65    | — | 7,642 | 7,642 | 0.41    | 1.23    | 0.46    | 8,018 |
| Average Daily               | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | < 0.005 | < 0.005 | < 0.005 | 0.02    | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 3.83  | 3.83  | < 0.005 | < 0.005 | 0.01    | 3.89  |
| Vendor                      | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Hauling                     | 0.03    | 0.01    | 0.55    | 0.20    | < 0.005 | 0.01    | 0.11    | 0.11    | 0.01    | 0.03    | 0.04    | — | 419   | 419   | 0.02    | 0.07    | 0.42    | 440   |
| Annual                      | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker                      | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 0.63  | 0.63  | < 0.005 | < 0.005 | < 0.005 | 0.64  |
| Vendor                      | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Hauling                     | 0.01    | < 0.005 | 0.10    | 0.04    | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | 0.01    | 0.01    | — | 69.3  | 69.3  | < 0.005 | 0.01    | 0.07    | 72.8  |

### 3.4. Site Preparation (2024) - Mitigated

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

| Location | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|

|                                      |      |         |      |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|--------------------------------------|------|---------|------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Onsite                               | —    | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Daily,<br>Summer<br>(Max)            | —    | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Daily,<br>Winter<br>(Max)            | —    | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road<br>Equipment                | 0.54 | 0.45    | 3.86 | 6.06 | 0.01    | 0.18    | —       | 0.18    | 0.16    | —       | 0.16    | — | 933  | 933  | 0.04    | 0.01    | —    | 937  |
| Dust<br>From<br>Material<br>Movement | —    | —       | —    | —    | —       | —       | 0.01    | 0.01    | —       | < 0.005 | < 0.005 | — | —    | —    | —       | —       | —    | —    |
| Onsite<br>truck                      | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Average<br>Daily                     | —    | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road<br>Equipment                | 0.03 | 0.02    | 0.21 | 0.33 | < 0.005 | 0.01    | —       | 0.01    | 0.01    | —       | 0.01    | — | 51.1 | 51.1 | < 0.005 | < 0.005 | —    | 51.3 |
| Dust<br>From<br>Material<br>Movement | —    | —       | —    | —    | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —    | —    | —       | —       | —    | —    |
| Onsite<br>truck                      | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                               | —    | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road<br>Equipment                | 0.01 | < 0.005 | 0.04 | 0.06 | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | —       | < 0.005 | — | 8.47 | 8.47 | < 0.005 | < 0.005 | —    | 8.50 |
| Dust<br>From<br>Material<br>Movement | —    | —       | —    | —    | —       | —       | < 0.005 | < 0.005 | —       | < 0.005 | < 0.005 | — | —    | —    | —       | —       | —    | —    |
| Onsite<br>truck                      | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Offsite                              | —    | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |

|                     |         |         |         |         |         |         |         |         |         |         |         |   |       |       |         |         |         |       |
|---------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|-------|-------|---------|---------|---------|-------|
| Daily, Summer (Max) | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Daily, Winter (Max) | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker              | 0.03    | 0.03    | 0.03    | 0.35    | 0.00    | 0.00    | 0.07    | 0.07    | 0.00    | 0.02    | 0.02    | — | 68.9  | 68.9  | < 0.005 | < 0.005 | 0.01    | 69.8  |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Hauling             | 0.57    | 0.16    | 9.92    | 3.67    | 0.05    | 0.10    | 2.01    | 2.10    | 0.10    | 0.55    | 0.65    | — | 7,642 | 7,642 | 0.41    | 1.23    | 0.46    | 8,018 |
| Average Daily       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker              | < 0.005 | < 0.005 | < 0.005 | 0.02    | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 3.83  | 3.83  | < 0.005 | < 0.005 | 0.01    | 3.89  |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Hauling             | 0.03    | 0.01    | 0.55    | 0.20    | < 0.005 | 0.01    | 0.11    | 0.11    | 0.01    | 0.03    | 0.04    | — | 419   | 419   | 0.02    | 0.07    | 0.42    | 440   |
| Annual              | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | —       | — | —     | —     | —       | —       | —       | —     |
| Worker              | < 0.005 | < 0.005 | < 0.005 | < 0.005 | 0.00    | 0.00    | < 0.005 | < 0.005 | 0.00    | < 0.005 | < 0.005 | — | 0.63  | 0.63  | < 0.005 | < 0.005 | < 0.005 | 0.64  |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00  | 0.00  | 0.00    | 0.00    | 0.00    | 0.00  |
| Hauling             | 0.01    | < 0.005 | 0.10    | 0.04    | < 0.005 | < 0.005 | 0.02    | 0.02    | < 0.005 | 0.01    | 0.01    | — | 69.3  | 69.3  | < 0.005 | 0.01    | 0.07    | 72.8  |

### 3.5. Building Construction (2024) - Unmitigated

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

| Location            | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O  | R    | CO2e |
|---------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|------|------|------|------|------|
| Onsite              | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —    |
| Daily, Summer (Max) | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | —    | —    |
| Off-Road Equipment  | 0.76 | 0.63 | 5.16 | 6.81 | 0.01 | 0.22  | —     | 0.22  | 0.20   | —      | 0.20   | —    | 934   | 934  | 0.04 | 0.01 | —    | 937  |
| Onsite truck        | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

|                     |      |         |      |      |         |         |      |      |         |      |      |   |      |      |         |         |      |      |
|---------------------|------|---------|------|------|---------|---------|------|------|---------|------|------|---|------|------|---------|---------|------|------|
| Daily, Winter (Max) | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment  | 0.76 | 0.63    | 5.16 | 6.81 | 0.01    | 0.22    | —    | 0.22 | 0.20    | —    | 0.20 | — | 934  | 934  | 0.04    | 0.01    | —    | 937  |
| Onsite truck        | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Average Daily       | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment  | 0.27 | 0.23    | 1.84 | 2.43 | < 0.005 | 0.08    | —    | 0.08 | 0.07    | —    | 0.07 | — | 333  | 333  | 0.01    | < 0.005 | —    | 334  |
| Onsite truck        | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual              | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment  | 0.05 | 0.04    | 0.34 | 0.44 | < 0.005 | 0.01    | —    | 0.01 | 0.01    | —    | 0.01 | — | 55.1 | 55.1 | < 0.005 | < 0.005 | —    | 55.3 |
| Onsite truck        | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Offsite             | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |
| Daily, Summer (Max) | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |
| Worker              | 0.16 | 0.15    | 0.13 | 1.98 | 0.00    | 0.00    | 0.33 | 0.33 | 0.00    | 0.08 | 0.08 | — | 356  | 356  | 0.02    | 0.01    | 1.40 | 361  |
| Vendor              | 0.01 | < 0.005 | 0.17 | 0.09 | < 0.005 | < 0.005 | 0.04 | 0.04 | < 0.005 | 0.01 | 0.01 | — | 135  | 135  | 0.01    | 0.02    | 0.36 | 141  |
| Hauling             | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max) | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |
| Worker              | 0.16 | 0.15    | 0.15 | 1.71 | 0.00    | 0.00    | 0.33 | 0.33 | 0.00    | 0.08 | 0.08 | — | 337  | 337  | 0.02    | 0.01    | 0.04 | 342  |
| Vendor              | 0.01 | < 0.005 | 0.18 | 0.09 | < 0.005 | < 0.005 | 0.04 | 0.04 | < 0.005 | 0.01 | 0.01 | — | 135  | 135  | 0.01    | 0.02    | 0.01 | 141  |
| Hauling             | 0.00 | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Average Daily       | —    | —       | —    | —    | —       | —       | —    | —    | —       | —    | —    | — | —    | —    | —       | —       | —    | —    |

|         |         |         |      |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|---------|---------|---------|------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Worker  | 0.06    | 0.05    | 0.05 | 0.64 | 0.00    | 0.00    | 0.11    | 0.11    | 0.00    | 0.03    | 0.03    | — | 122  | 122  | 0.01    | < 0.005 | 0.21 | 124  |
| Vendor  | < 0.005 | < 0.005 | 0.06 | 0.03 | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 48.1 | 48.1 | < 0.005 | 0.01    | 0.06 | 50.2 |
| Hauling | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual  | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker  | 0.01    | 0.01    | 0.01 | 0.12 | 0.00    | 0.00    | 0.02    | 0.02    | 0.00    | < 0.005 | < 0.005 | — | 20.2 | 20.2 | < 0.005 | < 0.005 | 0.04 | 20.5 |
| Vendor  | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 7.97 | 7.97 | < 0.005 | < 0.005 | 0.01 | 8.31 |
| Hauling | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

### 3.6. Building Construction (2024) - Mitigated

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

| Location                  | TOG  | ROG  | NOx  | CO   | SO2     | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O     | R    | CO2e |
|---------------------------|------|------|------|------|---------|-------|-------|-------|--------|--------|--------|------|-------|------|------|---------|------|------|
| Onsite                    | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | —    | —    |
| Daily,<br>Summer<br>(Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | —    | —    |
| Off-Road<br>Equipment     | 0.76 | 0.63 | 5.16 | 6.81 | 0.01    | 0.22  | —     | 0.22  | 0.20   | —      | 0.20   | —    | 934   | 934  | 0.04 | 0.01    | —    | 937  |
| Onsite<br>truck           | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 |
| Daily,<br>Winter<br>(Max) | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | —    | —    |
| Off-Road<br>Equipment     | 0.76 | 0.63 | 5.16 | 6.81 | 0.01    | 0.22  | —     | 0.22  | 0.20   | —      | 0.20   | —    | 934   | 934  | 0.04 | 0.01    | —    | 937  |
| Onsite<br>truck           | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 |
| Average<br>Daily          | —    | —    | —    | —    | —       | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | —    | —    |
| Off-Road<br>Equipment     | 0.27 | 0.23 | 1.84 | 2.43 | < 0.005 | 0.08  | —     | 0.08  | 0.07   | —      | 0.07   | —    | 333   | 333  | 0.01 | < 0.005 | —    | 334  |



|                     |         |         |      |      |         |         |         |         |         |         |         |   |      |      |         |         |      |      |
|---------------------|---------|---------|------|------|---------|---------|---------|---------|---------|---------|---------|---|------|------|---------|---------|------|------|
| Onsite truck        | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual              | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment  | 0.05    | 0.04    | 0.34 | 0.44 | < 0.005 | 0.01    | —       | 0.01    | 0.01    | —       | 0.01    | — | 55.1 | 55.1 | < 0.005 | < 0.005 | —    | 55.3 |
| Onsite truck        | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Offsite             | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Daily, Summer (Max) | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker              | 0.16    | 0.15    | 0.13 | 1.98 | 0.00    | 0.00    | 0.33    | 0.33    | 0.00    | 0.08    | 0.08    | — | 356  | 356  | 0.02    | 0.01    | 1.40 | 361  |
| Vendor              | 0.01    | < 0.005 | 0.17 | 0.09 | < 0.005 | < 0.005 | 0.04    | 0.04    | < 0.005 | 0.01    | 0.01    | — | 135  | 135  | 0.01    | 0.02    | 0.36 | 141  |
| Hauling             | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max) | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker              | 0.16    | 0.15    | 0.15 | 1.71 | 0.00    | 0.00    | 0.33    | 0.33    | 0.00    | 0.08    | 0.08    | — | 337  | 337  | 0.02    | 0.01    | 0.04 | 342  |
| Vendor              | 0.01    | < 0.005 | 0.18 | 0.09 | < 0.005 | < 0.005 | 0.04    | 0.04    | < 0.005 | 0.01    | 0.01    | — | 135  | 135  | 0.01    | 0.02    | 0.01 | 141  |
| Hauling             | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Average Daily       | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker              | 0.06    | 0.05    | 0.05 | 0.64 | 0.00    | 0.00    | 0.11    | 0.11    | 0.00    | 0.03    | 0.03    | — | 122  | 122  | 0.01    | < 0.005 | 0.21 | 124  |
| Vendor              | < 0.005 | < 0.005 | 0.06 | 0.03 | < 0.005 | < 0.005 | 0.01    | 0.01    | < 0.005 | < 0.005 | < 0.005 | — | 48.1 | 48.1 | < 0.005 | 0.01    | 0.06 | 50.2 |
| Hauling             | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual              | —       | —       | —    | —    | —       | —       | —       | —       | —       | —       | —       | — | —    | —    | —       | —       | —    | —    |
| Worker              | 0.01    | 0.01    | 0.01 | 0.12 | 0.00    | 0.00    | 0.02    | 0.02    | 0.00    | < 0.005 | < 0.005 | — | 20.2 | 20.2 | < 0.005 | < 0.005 | 0.04 | 20.5 |
| Vendor              | < 0.005 | < 0.005 | 0.01 | 0.01 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | < 0.005 | — | 7.97 | 7.97 | < 0.005 | < 0.005 | 0.01 | 8.31 |
| Hauling             | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

### 3.7. Architectural Coating (2024) - Unmitigated

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

| Location                | TOG     | ROG     | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T   | PM2.5E  | PM2.5D | PM2.5T  | BCO2 | NBCO2 | CO2T | CH4     | N2O     | R    | CO2e |
|-------------------------|---------|---------|------|------|---------|---------|-------|---------|---------|--------|---------|------|-------|------|---------|---------|------|------|
| Onsite                  | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Daily, Summer (Max)     | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.33    | 0.27    | 1.82 | 2.29 | < 0.005 | 0.06    | —     | 0.06    | 0.06    | —      | 0.06    | —    | 267   | 267  | 0.01    | < 0.005 | —    | 268  |
| Architect ural Coatings | —       | 8.90    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00  | 0.00    | 0.00    | 0.00   | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max)     | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Average Daily           | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.03    | 0.02    | 0.15 | 0.19 | < 0.005 | 0.01    | —     | 0.01    | < 0.005 | —      | < 0.005 | —    | 21.9  | 21.9 | < 0.005 | < 0.005 | —    | 22.0 |
| Architect ural Coatings | —       | 0.73    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00  | 0.00    | 0.00    | 0.00   | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                  | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |
| Off-Road Equipment      | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 3.63  | 3.63 | < 0.005 | < 0.005 | —    | 3.65 |
| Architect ural Coatings | —       | 0.13    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | —    | —    |

|                     |         |         |         |      |      |      |         |         |      |         |         |   |      |      |         |         |         |      |
|---------------------|---------|---------|---------|------|------|------|---------|---------|------|---------|---------|---|------|------|---------|---------|---------|------|
| Onsite truck        | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Offsite             | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Daily, Summer (Max) | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | 0.03    | 0.03    | 0.03    | 0.40 | 0.00 | 0.00 | 0.07    | 0.07    | 0.00 | 0.02    | 0.02    | — | 71.1 | 71.1 | < 0.005 | < 0.005 | 0.28    | 72.3 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Daily, Winter (Max) | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Average Daily       | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | < 0.005 | < 0.005 | < 0.005 | 0.03 | 0.00 | 0.00 | 0.01    | 0.01    | 0.00 | < 0.005 | < 0.005 | — | 5.63 | 5.63 | < 0.005 | < 0.005 | 0.01    | 5.71 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Annual              | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | < 0.005 | < 0.005 | < 0.005 | 0.01 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 0.93 | 0.93 | < 0.005 | < 0.005 | < 0.005 | 0.95 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |

### 3.8. Architectural Coating (2024) - Mitigated

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

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

|                         |         |         |      |      |         |         |      |         |         |      |         |   |      |      |         |         |      |      |
|-------------------------|---------|---------|------|------|---------|---------|------|---------|---------|------|---------|---|------|------|---------|---------|------|------|
| Off-Road Equipment      | 0.33    | 0.27    | 1.82 | 2.29 | < 0.005 | 0.06    | —    | 0.06    | 0.06    | —    | 0.06    | — | 267  | 267  | 0.01    | < 0.005 | —    | 268  |
| Architect ural Coatings | —       | 8.90    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Daily, Winter (Max)     | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Average Daily           | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | 0.03    | 0.02    | 0.15 | 0.19 | < 0.005 | 0.01    | —    | 0.01    | < 0.005 | —    | < 0.005 | — | 21.9 | 21.9 | < 0.005 | < 0.005 | —    | 22.0 |
| Architect ural Coatings | —       | 0.73    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Annual                  | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Off-Road Equipment      | < 0.005 | < 0.005 | 0.03 | 0.03 | < 0.005 | < 0.005 | —    | < 0.005 | < 0.005 | —    | < 0.005 | — | 3.63 | 3.63 | < 0.005 | < 0.005 | —    | 3.65 |
| Architect ural Coatings | —       | 0.13    | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Onsite truck            | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Offsite                 | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Daily, Summer (Max)     | —       | —       | —    | —    | —       | —       | —    | —       | —       | —    | —       | — | —    | —    | —       | —       | —    | —    |
| Worker                  | 0.03    | 0.03    | 0.03 | 0.40 | 0.00    | 0.00    | 0.07 | 0.07    | 0.00    | 0.02 | 0.02    | — | 71.1 | 71.1 | < 0.005 | < 0.005 | 0.28 | 72.3 |
| Vendor                  | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |
| Hauling                 | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00 |

|                     |         |         |         |      |      |      |         |         |      |         |         |   |      |      |         |         |         |      |
|---------------------|---------|---------|---------|------|------|------|---------|---------|------|---------|---------|---|------|------|---------|---------|---------|------|
| Daily, Winter (Max) | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Average Daily       | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | < 0.005 | < 0.005 | < 0.005 | 0.03 | 0.00 | 0.00 | 0.01    | 0.01    | 0.00 | < 0.005 | < 0.005 | — | 5.63 | 5.63 | < 0.005 | < 0.005 | 0.01    | 5.71 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Annual              | —       | —       | —       | —    | —    | —    | —       | —       | —    | —       | —       | — | —    | —    | —       | —       | —       | —    |
| Worker              | < 0.005 | < 0.005 | < 0.005 | 0.01 | 0.00 | 0.00 | < 0.005 | < 0.005 | 0.00 | < 0.005 | < 0.005 | — | 0.93 | 0.93 | < 0.005 | < 0.005 | < 0.005 | 0.95 |
| Vendor              | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |
| Hauling             | 0.00    | 0.00    | 0.00    | 0.00 | 0.00 | 0.00 | 0.00    | 0.00    | 0.00 | 0.00    | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | 0.00    | 0.00 |

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

| Land Use                       | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O  | R    | CO2e  |
|--------------------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|------|------|-------|
| Daily, Summer (Max)            | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Apartments Mid Rise            | 1.37 | 1.24 | 0.97 | 10.9 | 0.02 | 0.02  | 0.83  | 0.85  | 0.01   | 0.15   | 0.16   | —    | 2,451 | 2,451 | 0.12 | 0.10 | 9.65 | 2,493 |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00  | 0.00 | 0.00 | 0.00 | 0.00  |
| Total                          | 1.37 | 1.24 | 0.97 | 10.9 | 0.02 | 0.02  | 0.83  | 0.85  | 0.01   | 0.15   | 0.16   | —    | 2,451 | 2,451 | 0.12 | 0.10 | 9.65 | 2,493 |

|                                |      |      |      |       |         |         |      |      |         |      |      |   |       |       |      |      |      |       |
|--------------------------------|------|------|------|-------|---------|---------|------|------|---------|------|------|---|-------|-------|------|------|------|-------|
| Daily, Winter (Max)            | —    | —    | —    | —     | —       | —       | —    | —    | —       | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Apartments Mid Rise            | 1.35 | 1.22 | 1.07 | 10.00 | 0.02    | 0.02    | 0.83 | 0.85 | 0.01    | 0.15 | 0.16 | — | 2,347 | 2,347 | 0.13 | 0.10 | 0.25 | 2,381 |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00  | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00  | 0.00  | 0.00 | 0.00 | 0.00 | 0.00  |
| Total                          | 1.35 | 1.22 | 1.07 | 10.00 | 0.02    | 0.02    | 0.83 | 0.85 | 0.01    | 0.15 | 0.16 | — | 2,347 | 2,347 | 0.13 | 0.10 | 0.25 | 2,381 |
| Annual                         | —    | —    | —    | —     | —       | —       | —    | —    | —       | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Apartments Mid Rise            | 0.22 | 0.20 | 0.18 | 1.69  | < 0.005 | < 0.005 | 0.14 | 0.14 | < 0.005 | 0.02 | 0.03 | — | 356   | 356   | 0.02 | 0.02 | 0.62 | 362   |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00  | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00  | 0.00  | 0.00 | 0.00 | 0.00 | 0.00  |
| Total                          | 0.22 | 0.20 | 0.18 | 1.69  | < 0.005 | < 0.005 | 0.14 | 0.14 | < 0.005 | 0.02 | 0.03 | — | 356   | 356   | 0.02 | 0.02 | 0.62 | 362   |

#### 4.1.2. Mitigated

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

| Land Use                       | TOG  | ROG  | NOx  | CO   | SO2  | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T  | CH4  | N2O  | R    | CO2e  |
|--------------------------------|------|------|------|------|------|-------|-------|-------|--------|--------|--------|------|-------|-------|------|------|------|-------|
| Daily, Summer (Max)            | —    | —    | —    | —    | —    | —     | —     | —     | —      | —      | —      | —    | —     | —     | —    | —    | —    | —     |
| Apartments Mid Rise            | 1.37 | 1.24 | 0.97 | 10.9 | 0.02 | 0.02  | 0.83  | 0.85  | 0.01   | 0.15   | 0.16   | —    | 2,451 | 2,451 | 0.12 | 0.10 | 9.65 | 2,493 |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00  | 0.00  | 0.00  | 0.00   | 0.00   | 0.00   | —    | 0.00  | 0.00  | 0.00 | 0.00 | 0.00 | 0.00  |

|                                |      |      |      |       |         |         |      |      |         |      |      |   |       |       |      |      |      |       |
|--------------------------------|------|------|------|-------|---------|---------|------|------|---------|------|------|---|-------|-------|------|------|------|-------|
| Total                          | 1.37 | 1.24 | 0.97 | 10.9  | 0.02    | 0.02    | 0.83 | 0.85 | 0.01    | 0.15 | 0.16 | — | 2,451 | 2,451 | 0.12 | 0.10 | 9.65 | 2,493 |
| Daily, Winter (Max)            | —    | —    | —    | —     | —       | —       | —    | —    | —       | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Apartments Mid Rise            | 1.35 | 1.22 | 1.07 | 10.00 | 0.02    | 0.02    | 0.83 | 0.85 | 0.01    | 0.15 | 0.16 | — | 2,347 | 2,347 | 0.13 | 0.10 | 0.25 | 2,381 |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00  | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00  | 0.00  | 0.00 | 0.00 | 0.00 | 0.00  |
| Total                          | 1.35 | 1.22 | 1.07 | 10.00 | 0.02    | 0.02    | 0.83 | 0.85 | 0.01    | 0.15 | 0.16 | — | 2,347 | 2,347 | 0.13 | 0.10 | 0.25 | 2,381 |
| Annual                         | —    | —    | —    | —     | —       | —       | —    | —    | —       | —    | —    | — | —     | —     | —    | —    | —    | —     |
| Apartments Mid Rise            | 0.22 | 0.20 | 0.18 | 1.69  | < 0.005 | < 0.005 | 0.14 | 0.14 | < 0.005 | 0.02 | 0.03 | — | 356   | 356   | 0.02 | 0.02 | 0.62 | 362   |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | 0.00  | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00 | 0.00 | — | 0.00  | 0.00  | 0.00 | 0.00 | 0.00 | 0.00  |
| Total                          | 0.22 | 0.20 | 0.18 | 1.69  | < 0.005 | < 0.005 | 0.14 | 0.14 | < 0.005 | 0.02 | 0.03 | — | 356   | 356   | 0.02 | 0.02 | 0.62 | 362   |

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

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

| Land Use            | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O     | R | CO2e |
|---------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|------|---------|---|------|
| Daily, Summer (Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —       | — | —    |
| Apartments Mid Rise | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | 179   | 179  | 0.02 | < 0.005 | — | 180  |

|                                |   |   |   |   |   |   |   |   |   |   |   |   |      |      |         |         |   |      |
|--------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|------|------|---------|---------|---|------|
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Daily, Winter (Max)            | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Annual                         | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | — | 29.6 | 29.6 | < 0.005 | < 0.005 | — | 29.7 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | — | 29.6 | 29.6 | < 0.005 | < 0.005 | — | 29.7 |

#### 4.2.2. Electricity Emissions By Land Use - Mitigated

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

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



|                                |   |   |   |   |   |   |   |   |   |   |   |   |      |      |         |         |   |      |
|--------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|------|------|---------|---------|---|------|
| Apartments                     | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Daily, Winter (Max)            | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | — | 179  | 179  | 0.02    | < 0.005 | — | 180  |
| Annual                         | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | — | 29.6 | 29.6 | < 0.005 | < 0.005 | — | 29.7 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | — | 29.6 | 29.6 | < 0.005 | < 0.005 | — | 29.7 |

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|

|                                |         |         |      |      |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|--------------------------------|---------|---------|------|------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Daily, Summer (Max)            | —       | —       | —    | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 182  | 182  | 0.02    | < 0.005 | — | 182  |
| Enclosed Parking with Elevator | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 182  | 182  | 0.02    | < 0.005 | — | 182  |
| Daily, Winter (Max)            | —       | —       | —    | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 182  | 182  | 0.02    | < 0.005 | — | 182  |
| Enclosed Parking with Elevator | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | — | 0.01    | 0.01    | — | 0.01    | — | 182  | 182  | 0.02    | < 0.005 | — | 182  |
| Annual                         | —       | —       | —    | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Apartments Mid Rise            | < 0.005 | < 0.005 | 0.03 | 0.01 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 30.1 | 30.1 | < 0.005 | < 0.005 | — | 30.1 |
| Enclosed Parking with Elevator | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00    | 0.00    | — | 0.00    | — | 0.00 | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | < 0.005 | < 0.005 | 0.03 | 0.01 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 30.1 | 30.1 | < 0.005 | < 0.005 | — | 30.1 |

#### 4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

| Land Use                       | TOG     | ROG     | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T   | PM2.5E  | PM2.5D | PM2.5T  | BCO2 | NBCO2 | CO2T | CH4     | N2O     | R | CO2e |
|--------------------------------|---------|---------|------|------|---------|---------|-------|---------|---------|--------|---------|------|-------|------|---------|---------|---|------|
| Daily, Summer (Max)            | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Apartments Mid Rise            | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | —     | 0.01    | 0.01    | —      | 0.01    | —    | 182   | 182  | 0.02    | < 0.005 | — | 182  |
| Enclosed Parking with Elevator | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | —     | 0.00    | 0.00    | —      | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | —     | 0.01    | 0.01    | —      | 0.01    | —    | 182   | 182  | 0.02    | < 0.005 | — | 182  |
| Daily, Winter (Max)            | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Apartments Mid Rise            | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | —     | 0.01    | 0.01    | —      | 0.01    | —    | 182   | 182  | 0.02    | < 0.005 | — | 182  |
| Enclosed Parking with Elevator | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | —     | 0.00    | 0.00    | —      | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | 0.02    | 0.01    | 0.14 | 0.06 | < 0.005 | 0.01    | —     | 0.01    | 0.01    | —      | 0.01    | —    | 182   | 182  | 0.02    | < 0.005 | — | 182  |
| Annual                         | —       | —       | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Apartments Mid Rise            | < 0.005 | < 0.005 | 0.03 | 0.01 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 30.1  | 30.1 | < 0.005 | < 0.005 | — | 30.1 |
| Enclosed Parking with Elevator | 0.00    | 0.00    | 0.00 | 0.00 | 0.00    | 0.00    | —     | 0.00    | 0.00    | —      | 0.00    | —    | 0.00  | 0.00 | 0.00    | 0.00    | — | 0.00 |
| Total                          | < 0.005 | < 0.005 | 0.03 | 0.01 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 30.1  | 30.1 | < 0.005 | < 0.005 | — | 30.1 |

### 4.3. Area Emissions by Source

#### 4.3.2. Unmitigated

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

| Source                 | TOG  | ROG  | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T   | PM2.5E  | PM2.5D | PM2.5T  | BCO2 | NBCO2 | CO2T | CH4     | N2O     | R | CO2e |
|------------------------|------|------|------|------|---------|---------|-------|---------|---------|--------|---------|------|-------|------|---------|---------|---|------|
| Daily, Summer (Max)    | —    | —    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.91 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.07 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Landscape Equipment    | 0.28 | 0.26 | 0.03 | 2.88 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 7.74  | 7.74 | < 0.005 | < 0.005 | — | 7.76 |
| Total                  | 0.28 | 1.25 | 0.03 | 2.88 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 7.74  | 7.74 | < 0.005 | < 0.005 | — | 7.76 |
| Daily, Winter (Max)    | —    | —    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.91 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.07 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Total                  | —    | 0.99 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Annual                 | —    | —    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.17 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |

|                     |      |      |         |      |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|---------------------|------|------|---------|------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Architectural       | —    | 0.01 | —       | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Landscape Equipment | 0.03 | 0.03 | < 0.005 | 0.36 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.88 | 0.88 | < 0.005 | < 0.005 | — | 0.88 |
| Total               | 0.03 | 0.21 | < 0.005 | 0.36 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.88 | 0.88 | < 0.005 | < 0.005 | — | 0.88 |

#### 4.3.1. Mitigated

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

| Source                 | TOG  | ROG  | NOx  | CO   | SO2     | PM10E   | PM10D | PM10T   | PM2.5E  | PM2.5D | PM2.5T  | BCO2 | NBCO2 | CO2T | CH4     | N2O     | R | CO2e |
|------------------------|------|------|------|------|---------|---------|-------|---------|---------|--------|---------|------|-------|------|---------|---------|---|------|
| Daily, Summer (Max)    | —    | —    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.91 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.07 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Landscape Equipment    | 0.28 | 0.26 | 0.03 | 2.88 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 7.74  | 7.74 | < 0.005 | < 0.005 | — | 7.76 |
| Total                  | 0.28 | 1.25 | 0.03 | 2.88 | < 0.005 | < 0.005 | —     | < 0.005 | < 0.005 | —      | < 0.005 | —    | 7.74  | 7.74 | < 0.005 | < 0.005 | — | 7.76 |
| Daily, Winter (Max)    | —    | —    | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.91 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.07 | —    | —    | —       | —       | —     | —       | —       | —      | —       | —    | —     | —    | —       | —       | — | —    |

|                        |      |      |         |      |         |         |   |         |         |   |         |   |      |      |         |         |   |      |
|------------------------|------|------|---------|------|---------|---------|---|---------|---------|---|---------|---|------|------|---------|---------|---|------|
| Total                  | —    | 0.99 | —       | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Annual                 | —    | —    | —       | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Consumer Products      | —    | 0.17 | —       | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Architectural Coatings | —    | 0.01 | —       | —    | —       | —       | — | —       | —       | — | —       | — | —    | —    | —       | —       | — | —    |
| Landscape Equipment    | 0.03 | 0.03 | < 0.005 | 0.36 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.88 | 0.88 | < 0.005 | < 0.005 | — | 0.88 |
| Total                  | 0.03 | 0.21 | < 0.005 | 0.36 | < 0.005 | < 0.005 | — | < 0.005 | < 0.005 | — | < 0.005 | — | 0.88 | 0.88 | < 0.005 | < 0.005 | — | 0.88 |

## 4.4. Water Emissions by Land Use

### 4.4.2. Unmitigated

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

| Land Use                       | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O  | R | CO2e |
|--------------------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|------|------|---|------|
| Daily, Summer (Max)            | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |
| Apartments Mid Rise            | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 3.64 | 12.8  | 16.5 | 0.37 | 0.01 | — | 28.5 |
| Enclosed Parking with Elevator | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.00 | 0.00  | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 3.64 | 12.8  | 16.5 | 0.37 | 0.01 | — | 28.5 |
| Daily, Winter (Max)            | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |

|                                         |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |         |   |      |
|-----------------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|---------|---|------|
| Apartme<br>Mid Rise                     | — | — | — | — | — | — | — | — | — | — | — | 3.64 | 12.8 | 16.5 | 0.37 | 0.01    | — | 28.5 |
| Enclosed<br>Parking<br>with<br>Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | — | 0.00 |
| Total                                   | — | — | — | — | — | — | — | — | — | — | — | 3.64 | 12.8 | 16.5 | 0.37 | 0.01    | — | 28.5 |
| Annual                                  | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —       | — | —    |
| Apartme<br>nts<br>Mid Rise              | — | — | — | — | — | — | — | — | — | — | — | 0.60 | 2.12 | 2.72 | 0.06 | < 0.005 | — | 4.72 |
| Enclosed<br>Parking<br>with<br>Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | — | 0.00 |
| Total                                   | — | — | — | — | — | — | — | — | — | — | — | 0.60 | 2.12 | 2.72 | 0.06 | < 0.005 | — | 4.72 |

#### 4.4.1. Mitigated

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

| Land<br>Use                             | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O  | R | CO2e |
|-----------------------------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|------|------|---|------|
| Daily,<br>Summer<br>(Max)               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |
| Apartme<br>nts<br>Mid Rise              | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 3.10 | 10.9  | 14.0 | 0.32 | 0.01 | — | 24.2 |
| Enclosed<br>Parking<br>with<br>Elevator | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 0.00 | 0.00  | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                                   | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 3.10 | 10.9  | 14.0 | 0.32 | 0.01 | — | 24.2 |

|                                |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |         |   |      |
|--------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|---------|---|------|
| Daily, Winter (Max)            | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —       | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | 3.10 | 10.9 | 14.0 | 0.32 | 0.01    | — | 24.2 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 3.10 | 10.9 | 14.0 | 0.32 | 0.01    | — | 24.2 |
| Annual                         | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —       | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | 0.51 | 1.80 | 2.32 | 0.05 | < 0.005 | — | 4.01 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00    | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 0.51 | 1.80 | 2.32 | 0.05 | < 0.005 | — | 4.01 |

## 4.5. Waste Emissions by Land Use

### 4.5.2. Unmitigated

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

| Land Use            | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4  | N2O  | R | CO2e |
|---------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|------|------|---|------|
| Daily, Summer (Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —    | —    | — | —    |
| Apartments Mid Rise | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | 23.4 | 0.00  | 23.4 | 2.34 | 0.00 | — | 82.0 |



|                                |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |      |   |      |
|--------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|------|---|------|
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Daily, Winter (Max)            | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Annual                         | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | 3.88 | 0.00 | 3.88 | 0.39 | 0.00 | — | 13.6 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 3.88 | 0.00 | 3.88 | 0.39 | 0.00 | — | 13.6 |

#### 4.5.1. Mitigated

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

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

|                                |   |   |   |   |   |   |   |   |   |   |   |      |      |      |      |      |   |      |
|--------------------------------|---|---|---|---|---|---|---|---|---|---|---|------|------|------|------|------|---|------|
| Apartments                     | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Daily, Winter (Max)            | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 23.4 | 0.00 | 23.4 | 2.34 | 0.00 | — | 82.0 |
| Annual                         | — | — | — | — | — | — | — | — | — | — | — | —    | —    | —    | —    | —    | — | —    |
| Apartments Mid Rise            | — | — | — | — | — | — | — | — | — | — | — | 3.88 | 0.00 | 3.88 | 0.39 | 0.00 | — | 13.6 |
| Enclosed Parking with Elevator | — | — | — | — | — | — | — | — | — | — | — | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | — | 0.00 |
| Total                          | — | — | — | — | — | — | — | — | — | — | — | 3.88 | 0.00 | 3.88 | 0.39 | 0.00 | — | 13.6 |

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

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

| Land Use | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R | CO2e |
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|
|----------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|---|------|

|                     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |      |      |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|------|------|
| Daily, Summer (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.31 | 0.31 |
| Total               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.31 | 0.31 |
| Daily, Winter (Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.31 | 0.31 |
| Total               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.31 | 0.31 |
| Annual              | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    |
| Apartments Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.05 | 0.05 |
| Total               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.05 | 0.05 |

#### 4.6.2. Mitigated

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

| Land Use            | TOG | ROG | NOx | CO | SO2 | PM10E | PM10D | PM10T | PM2.5E | PM2.5D | PM2.5T | BCO2 | NBCO2 | CO2T | CH4 | N2O | R    | CO2e |
|---------------------|-----|-----|-----|----|-----|-------|-------|-------|--------|--------|--------|------|-------|------|-----|-----|------|------|
| Daily, Summer (Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | —    | —    |
| Apartments Mid Rise | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.31 | 0.31 |
| Total               | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | 0.31 | 0.31 |
| Daily, Winter (Max) | —   | —   | —   | —  | —   | —     | —     | —     | —      | —      | —      | —    | —     | —    | —   | —   | —    | —    |

|                            |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |      |      |
|----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|------|------|
| Apartme<br>Mid Rise        | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.31 | 0.31 |
| Total                      | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.31 | 0.31 |
| Annual                     | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | —    | —    |
| Apartme<br>nts<br>Mid Rise | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.05 | 0.05 |
| Total                      | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | 0.05 | 0.05 |

## 4.7. Offroad Emissions By Equipment Type

### 4.7.1. Unmitigated

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

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

### 4.7.2. Mitigated

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

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

## 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

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

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

## 4.8.2. Mitigated

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

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

## 4.9. User Defined Emissions By Equipment Type

### 4.9.1. Unmitigated

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

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

|        |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|--------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Annual | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Total  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

#### 4.9.2. Mitigated

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

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

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

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

#### 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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



|                           |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|---------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Sequest                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Remove<br>d               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —                         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Daily,<br>Winter<br>(Max) | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequest<br>ered           | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Remove<br>d               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —                         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Annual                    | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Avoided                   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Sequest<br>ered           | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Remove<br>d               | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal                  | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —                         | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

#### 4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

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

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

|          |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|----------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Remove   | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| Subtotal | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |
| —        | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — | — |

## 5. Activity Data

### 5.1. Construction Schedule

| Phase Name            | Phase Type            | Start Date | End Date  | Days Per Week | Work Days per Phase | Phase Description |
|-----------------------|-----------------------|------------|-----------|---------------|---------------------|-------------------|
| Demolition            | Demolition            | 1/1/2024   | 1/12/2024 | 5.00          | 10.0                | —                 |
| Site Preparation      | Site Preparation      | 1/15/2024  | 2/9/2024  | 5.00          | 20.0                | —                 |
| Building Construction | Building Construction | 2/12/2024  | 8/9/2024  | 5.00          | 130                 | —                 |
| Architectural Coating | Architectural Coating | 8/12/2024  | 9/20/2024 | 5.00          | 30.0                | —                 |

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

| Phase Name            | Equipment Type            | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|-----------------------|---------------------------|-----------|-------------|----------------|---------------|------------|-------------|
| Site Preparation      | Tractors/Loaders/Backhoes | Diesel    | Average     | 1.00           | 8.00          | 84.0       | 0.37        |
| Building Construction | Forklifts                 | Diesel    | Average     | 2.00           | 6.00          | 82.0       | 0.20        |
| Building Construction | Tractors/Loaders/Backhoes | Diesel    | Average     | 1.00           | 8.00          | 84.0       | 0.37        |
| Building Construction | Welders                   | Diesel    | Average     | 2.00           | 8.00          | 46.0       | 0.45        |
| Architectural Coating | Air Compressors           | Diesel    | Average     | 2.00           | 6.00          | 37.0       | 0.48        |
| Demolition            | Rubber Tired Dozers       | Diesel    | Average     | 1.00           | 1.00          | 367        | 0.40        |
| Demolition            | Tractors/Loaders/Backhoes | Diesel    | Average     | 2.00           | 8.00          | 84.0       | 0.37        |

|                  |                          |        |         |      |      |      |      |
|------------------|--------------------------|--------|---------|------|------|------|------|
| Demolition       | Concrete/Industrial Saws | Diesel | Average | 1.00 | 8.00 | 33.0 | 0.73 |
| Site Preparation | Excavators               | Diesel | Average | 1.00 | 8.00 | 36.0 | 0.38 |
| Site Preparation | Rubber Tired Loaders     | Diesel | Average | 1.00 | 8.00 | 150  | 0.36 |

### 5.2.2. Mitigated

| Phase Name            | Equipment Type            | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|-----------------------|---------------------------|-----------|-------------|----------------|---------------|------------|-------------|
| Site Preparation      | Tractors/Loaders/Backhoes | Diesel    | Average     | 1.00           | 8.00          | 84.0       | 0.37        |
| Building Construction | Forklifts                 | Diesel    | Average     | 2.00           | 6.00          | 82.0       | 0.20        |
| Building Construction | Tractors/Loaders/Backhoes | Diesel    | Average     | 1.00           | 8.00          | 84.0       | 0.37        |
| Building Construction | Welders                   | Diesel    | Average     | 2.00           | 8.00          | 46.0       | 0.45        |
| Architectural Coating | Air Compressors           | Diesel    | Average     | 2.00           | 6.00          | 37.0       | 0.48        |
| Demolition            | Rubber Tired Dozers       | Diesel    | Average     | 1.00           | 1.00          | 367        | 0.40        |
| Demolition            | Tractors/Loaders/Backhoes | Diesel    | Average     | 2.00           | 8.00          | 84.0       | 0.37        |
| Demolition            | Concrete/Industrial Saws  | Diesel    | Average     | 1.00           | 8.00          | 33.0       | 0.73        |
| Site Preparation      | Excavators                | Diesel    | Average     | 1.00           | 8.00          | 36.0       | 0.38        |
| Site Preparation      | Rubber Tired Loaders      | Diesel    | Average     | 1.00           | 8.00          | 150        | 0.36        |

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

| Phase Name       | Trip Type | One-Way Trips per Day | Miles per Trip | Vehicle Mix   |
|------------------|-----------|-----------------------|----------------|---------------|
| Site Preparation | —         | —                     | —              | —             |
| Site Preparation | Worker    | 7.50                  | 12.6           | LDA,LDT1,LDT2 |
| Site Preparation | Vendor    | —                     | 7.75           | HHDT,MHDT     |

|                       |              |      |      |               |
|-----------------------|--------------|------|------|---------------|
| Site Preparation      | Hauling      | 108  | 20.0 | HHDT          |
| Site Preparation      | Onsite truck | —    | —    | HHDT          |
| Building Construction | —            | —    | —    | —             |
| Building Construction | Worker       | 36.7 | 12.6 | LDA,LDT1,LDT2 |
| Building Construction | Vendor       | 5.45 | 7.75 | HHDT,MHDT     |
| Building Construction | Hauling      | 0.00 | 20.0 | HHDT          |
| Building Construction | Onsite truck | —    | —    | HHDT          |
| Architectural Coating | —            | —    | —    | —             |
| Architectural Coating | Worker       | 7.34 | 12.6 | LDA,LDT1,LDT2 |
| Architectural Coating | Vendor       | —    | 7.75 | HHDT,MHDT     |
| Architectural Coating | Hauling      | 0.00 | 20.0 | HHDT          |
| Architectural Coating | Onsite truck | —    | —    | HHDT          |
| Demolition            | —            | —    | —    | —             |
| Demolition            | Worker       | 10.0 | 12.6 | LDA,LDT1,LDT2 |
| Demolition            | Vendor       | —    | 7.75 | HHDT,MHDT     |
| Demolition            | Hauling      | 9.90 | 20.0 | HHDT          |
| Demolition            | Onsite truck | —    | —    | HHDT          |

### 5.3.2. Mitigated

| Phase Name            | Trip Type    | One-Way Trips per Day | Miles per Trip | Vehicle Mix   |
|-----------------------|--------------|-----------------------|----------------|---------------|
| Site Preparation      | —            | —                     | —              | —             |
| Site Preparation      | Worker       | 7.50                  | 12.6           | LDA,LDT1,LDT2 |
| Site Preparation      | Vendor       | —                     | 7.75           | HHDT,MHDT     |
| Site Preparation      | Hauling      | 108                   | 20.0           | HHDT          |
| Site Preparation      | Onsite truck | —                     | —              | HHDT          |
| Building Construction | —            | —                     | —              | —             |
| Building Construction | Worker       | 36.7                  | 12.6           | LDA,LDT1,LDT2 |

|                       |              |      |      |               |
|-----------------------|--------------|------|------|---------------|
| Building Construction | Vendor       | 5.45 | 7.75 | HHDT,MHDT     |
| Building Construction | Hauling      | 0.00 | 20.0 | HHDT          |
| Building Construction | Onsite truck | —    | —    | HHDT          |
| Architectural Coating | —            | —    | —    | —             |
| Architectural Coating | Worker       | 7.34 | 12.6 | LDA,LDT1,LDT2 |
| Architectural Coating | Vendor       | —    | 7.75 | HHDT,MHDT     |
| Architectural Coating | Hauling      | 0.00 | 20.0 | HHDT          |
| Architectural Coating | Onsite truck | —    | —    | HHDT          |
| Demolition            | —            | —    | —    | —             |
| Demolition            | Worker       | 10.0 | 12.6 | LDA,LDT1,LDT2 |
| Demolition            | Vendor       | —    | 7.75 | HHDT,MHDT     |
| Demolition            | Hauling      | 9.90 | 20.0 | HHDT          |
| Demolition            | Onsite truck | —    | —    | HHDT          |

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

| Phase Name            | Residential Interior Area Coated (sq ft) | Residential Exterior Area Coated (sq ft) | Non-Residential Interior Area Coated (sq ft) | Non-Residential Exterior Area Coated (sq ft) | Parking Area Coated (sq ft) |
|-----------------------|------------------------------------------|------------------------------------------|----------------------------------------------|----------------------------------------------|-----------------------------|
| Architectural Coating | 86,411                                   | 28,804                                   | 0.00                                         | 0.00                                         | —                           |

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

| Phase Name | Material Imported (Cubic Yards) | Material Exported (Cubic Yards) | Acres Graded (acres) | Material Demolished (Ton of Debris) | Acres Paved (acres) |
|------------|---------------------------------|---------------------------------|----------------------|-------------------------------------|---------------------|
|------------|---------------------------------|---------------------------------|----------------------|-------------------------------------|---------------------|

|                  |       |        |      |      |   |
|------------------|-------|--------|------|------|---|
| Demolition       | 0.00  | 0.00   | 0.00 | 0.00 | — |
| Site Preparation | 1,500 | 15,835 | 18.8 | 0.00 | — |

### 5.6.2. Construction Earthmoving Control Strategies

| Control Strategies Applied | Frequency (per day) | PM10 Reduction | PM2.5 Reduction |
|----------------------------|---------------------|----------------|-----------------|
| Water Exposed Area         | 2                   | 61%            | 61%             |
| Water Demolished Area      | 2                   | 36%            | 36%             |

## 5.7. Construction Paving

| Land Use                       | Area Paved (acres) | % Asphalt |
|--------------------------------|--------------------|-----------|
| Apartments Mid Rise            | —                  | 0%        |
| Enclosed Parking with Elevator | 0.00               | 100%      |

## 5.8. Construction Electricity Consumption and Emissions Factors

### kWh per Year and Emission Factor (lb/MWh)

| Year | kWh per Year | CO2 | CH4  | N2O     |
|------|--------------|-----|------|---------|
| 2024 | 0.00         | 532 | 0.03 | < 0.005 |

## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

| Land Use Type                  | Trips/Weekday | Trips/Saturday | Trips/Sunday | Trips/Year | VMt/Weekday | VMt/Saturday | VMt/Sunday | VMt/Year |
|--------------------------------|---------------|----------------|--------------|------------|-------------|--------------|------------|----------|
| Apartments Mid Rise            | 344           | 250            | 209          | 113,684    | 2,989       | 2,174        | 1,811      | 987,010  |
| Enclosed Parking with Elevator | 0.00          | 0.00           | 0.00         | 0.00       | 0.00        | 0.00         | 0.00       | 0.00     |



### 5.9.2. Mitigated

| Land Use Type                  | Trips/Weekday | Trips/Saturday | Trips/Sunday | Trips/Year | VMT/Weekday | VMT/Saturday | VMT/Sunday | VMT/Year |
|--------------------------------|---------------|----------------|--------------|------------|-------------|--------------|------------|----------|
| Apartments Mid Rise            | 344           | 250            | 209          | 113,684    | 2,989       | 2,174        | 1,811      | 987,010  |
| Enclosed Parking with Elevator | 0.00          | 0.00           | 0.00         | 0.00       | 0.00        | 0.00         | 0.00       | 0.00     |

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

#### 5.10.1.2. Mitigated

### 5.10.2. Architectural Coatings

| Residential Interior Area Coated (sq ft) | Residential Exterior Area Coated (sq ft) | Non-Residential Interior Area Coated (sq ft) | Non-Residential Exterior Area Coated (sq ft) | Parking Area Coated (sq ft) |
|------------------------------------------|------------------------------------------|----------------------------------------------|----------------------------------------------|-----------------------------|
| 86410.8                                  | 28,804                                   | 0.00                                         | 0.00                                         | —                           |

### 5.10.3. Landscape Equipment

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

### 5.10.4. Landscape Equipment - Mitigated

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

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

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

| Land Use                       | Electricity (kWh/yr) | CO2 | CH4    | N2O    | Natural Gas (kBTU/yr) |
|--------------------------------|----------------------|-----|--------|--------|-----------------------|
| Apartments Mid Rise            | 186,958              | 349 | 0.0330 | 0.0040 | 566,449               |
| Enclosed Parking with Elevator | 0.00                 | 349 | 0.0330 | 0.0040 | 0.00                  |

### 5.11.2. Mitigated

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

| Land Use                       | Electricity (kWh/yr) | CO2 | CH4    | N2O    | Natural Gas (kBTU/yr) |
|--------------------------------|----------------------|-----|--------|--------|-----------------------|
| Apartments Mid Rise            | 186,958              | 349 | 0.0330 | 0.0040 | 566,449               |
| Enclosed Parking with Elevator | 0.00                 | 349 | 0.0330 | 0.0040 | 0.00                  |

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

| Land Use                       | Indoor Water (gal/year) | Outdoor Water (gal/year) |
|--------------------------------|-------------------------|--------------------------|
| Apartments Mid Rise            | 1,900,964               | 89,031                   |
| Enclosed Parking with Elevator | 0.00                    | 0.00                     |

### 5.12.2. Mitigated

| Land Use                       | Indoor Water (gal/year) | Outdoor Water (gal/year) |
|--------------------------------|-------------------------|--------------------------|
| Apartments Mid Rise            | 1,615,819               | 75,676                   |
| Enclosed Parking with Elevator | 0.00                    | 0.00                     |

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

| Land Use                       | Waste (ton/year) | Cogeneration (kWh/year) |
|--------------------------------|------------------|-------------------------|
| Apartments Mid Rise            | 12.7             | 0.00                    |
| Enclosed Parking with Elevator | 0.00             | 0.00                    |

#### 5.13.2. Mitigated

| Land Use                       | Waste (ton/year) | Cogeneration (kWh/year) |
|--------------------------------|------------------|-------------------------|
| Apartments Mid Rise            | 12.7             | 0.00                    |
| Enclosed Parking with Elevator | 0.00             | 0.00                    |

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

| Land Use Type       | Equipment Type                                          | Refrigerant | GWP   | Quantity (kg) | Operations Leak Rate | Service Leak Rate | Times Serviced |
|---------------------|---------------------------------------------------------|-------------|-------|---------------|----------------------|-------------------|----------------|
| Apartments Mid Rise | Average room A/C & Other residential A/C and heat pumps | R-410A      | 2,088 | < 0.005       | 2.50                 | 2.50              | 10.0           |
| Apartments Mid Rise | Household refrigerators and/or freezers                 | R-134a      | 1,430 | 0.12          | 0.60                 | 0.00              | 1.00           |

#### 5.14.2. Mitigated

| Land Use Type       | Equipment Type                                          | Refrigerant | GWP   | Quantity (kg) | Operations Leak Rate | Service Leak Rate | Times Serviced |
|---------------------|---------------------------------------------------------|-------------|-------|---------------|----------------------|-------------------|----------------|
| Apartments Mid Rise | Average room A/C & Other residential A/C and heat pumps | R-410A      | 2,088 | < 0.005       | 2.50                 | 2.50              | 10.0           |

|                     |                                         |        |       |      |      |      |      |
|---------------------|-----------------------------------------|--------|-------|------|------|------|------|
| Apartments Mid Rise | Household refrigerators and/or freezers | R-134a | 1,430 | 0.12 | 0.60 | 0.00 | 1.00 |
|---------------------|-----------------------------------------|--------|-------|------|------|------|------|

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

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

### 5.15.2. Mitigated

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

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

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

### 5.16.2. Process Boilers

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

## 5.17. User Defined

| Equipment Type | Fuel Type |
|----------------|-----------|
| —              | —         |

## 5.18. Vegetation

### 5.18.1. Land Use Change

5.18.1.1. Unmitigated

| Vegetation Land Use Type | Vegetation Soil Type | Initial Acres | Final Acres |
|--------------------------|----------------------|---------------|-------------|
|--------------------------|----------------------|---------------|-------------|

5.18.1.2. Mitigated

| Vegetation Land Use Type | Vegetation Soil Type | Initial Acres | Final Acres |
|--------------------------|----------------------|---------------|-------------|
|--------------------------|----------------------|---------------|-------------|

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

| Biomass Cover Type | Initial Acres | Final Acres |
|--------------------|---------------|-------------|
|--------------------|---------------|-------------|

5.18.1.2. Mitigated

| Biomass Cover Type | Initial Acres | Final Acres |
|--------------------|---------------|-------------|
|--------------------|---------------|-------------|

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

5.18.2.2. Mitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

| Climate Hazard               | Result for Project Location | Unit                                       |
|------------------------------|-----------------------------|--------------------------------------------|
| Temperature and Extreme Heat | 23.4                        | annual days of extreme heat                |
| Extreme Precipitation        | 6.20                        | annual days with precipitation above 20 mm |
| Sea Level Rise               | 0.00                        | meters of inundation depth                 |
| Wildfire                     | 0.00                        | annual hectares burned                     |

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

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about  $\frac{3}{4}$  an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

| Climate Hazard               | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|------------------------------|----------------|-------------------|-------------------------|---------------------|
| Temperature and Extreme Heat | 3              | 1                 | 2                       | 2                   |
| Extreme Precipitation        | N/A            | N/A               | N/A                     | N/A                 |
| Sea Level Rise               | 1              | 1                 | 2                       | 1                   |
| Wildfire                     | 1              | 1                 | 2                       | 1                   |
| Flooding                     | N/A            | N/A               | N/A                     | N/A                 |
| Drought                      | N/A            | N/A               | N/A                     | N/A                 |
| Snowpack Reduction           | N/A            | N/A               | N/A                     | N/A                 |
| Air Quality Degradation      | 5              | 1                 | 2                       | 3                   |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

| Climate Hazard               | Exposure Score | Sensitivity Score | Adaptive Capacity Score | Vulnerability Score |
|------------------------------|----------------|-------------------|-------------------------|---------------------|
| Temperature and Extreme Heat | 3              | 1                 | 3                       | 2                   |
| Extreme Precipitation        | N/A            | N/A               | N/A                     | N/A                 |
| Sea Level Rise               | 1              | 1                 | 2                       | 1                   |
| Wildfire                     | 1              | 1                 | 2                       | 1                   |
| Flooding                     | N/A            | N/A               | N/A                     | N/A                 |
| Drought                      | N/A            | N/A               | N/A                     | N/A                 |
| Snowpack Reduction           | N/A            | N/A               | N/A                     | N/A                 |
| Air Quality Degradation      | 5              | 1                 | 2                       | 3                   |

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

6.4.1. Temperature and Extreme Heat

| User Selected Measures         | Co-Benefits Achieved                         | Exposure Reduction | Sensitivity Reduction | Adaptive Capacity Increase |
|--------------------------------|----------------------------------------------|--------------------|-----------------------|----------------------------|
| EH-10: Install Covered Parking | Improved Air Quality, Improved Public Health | —                  | —                     | 1.00                       |

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

| Indicator                       | Result for Project Census Tract |
|---------------------------------|---------------------------------|
| Exposure Indicators             | —                               |
| AQ-Ozone                        | 75.1                            |
| AQ-PM                           | 80.7                            |
| AQ-DPM                          | 54.1                            |
| Drinking Water                  | 86.3                            |
| Lead Risk Housing               | 66.4                            |
| Pesticides                      | 0.00                            |
| Toxic Releases                  | 77.8                            |
| Traffic                         | 79.3                            |
| Effect Indicators               | —                               |
| CleanUp Sites                   | 68.9                            |
| Groundwater                     | 0.00                            |
| Haz Waste Facilities/Generators | 75.8                            |
| Impaired Water Bodies           | 33.2                            |
| Solid Waste                     | 0.00                            |
| Sensitive Population            | —                               |
| Asthma                          | 71.8                            |
| Cardio-vascular                 | 58.3                            |
| Low Birth Weights               | 81.3                            |
| Socioeconomic Factor Indicators | —                               |
| Education                       | 56.5                            |
| Housing                         | 59.3                            |
| Linguistic                      | 61.5                            |
| Poverty                         | 45.5                            |
| Unemployment                    | 60.6                            |



## 7.2. Healthy Places Index Scores

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

| Indicator                                    | Result for Project Census Tract |
|----------------------------------------------|---------------------------------|
| Economic                                     | —                               |
| Above Poverty                                | 44.74528423                     |
| Employed                                     | 27.51186963                     |
| Median HI                                    | 53.54805595                     |
| Education                                    | —                               |
| Bachelor's or higher                         | 39.34300013                     |
| High school enrollment                       | 100                             |
| Preschool enrollment                         | 54.67727448                     |
| Transportation                               | —                               |
| Auto Access                                  | 36.95624278                     |
| Active commuting                             | 40.12575388                     |
| Social                                       | —                               |
| 2-parent households                          | 15.30861029                     |
| Voting                                       | 31.61811882                     |
| Neighborhood                                 | —                               |
| Alcohol availability                         | 41.12665212                     |
| Park access                                  | 29.70614654                     |
| Retail density                               | 71.17926344                     |
| Supermarket access                           | 86.79584242                     |
| Tree canopy                                  | 22.64853073                     |
| Housing                                      | —                               |
| Homeownership                                | 48.46657257                     |
| Housing habitability                         | 26.3826511                      |
| Low-inc homeowner severe housing cost burden | 26.76761196                     |

|                                           |             |
|-------------------------------------------|-------------|
| Low-inc renter severe housing cost burden | 60.6698319  |
| Uncrowded housing                         | 56.30694213 |
| Health Outcomes                           | —           |
| Insured adults                            | 22.68702682 |
| Arthritis                                 | 57.9        |
| Asthma ER Admissions                      | 43.2        |
| High Blood Pressure                       | 49.4        |
| Cancer (excluding skin)                   | 52.2        |
| Asthma                                    | 72.9        |
| Coronary Heart Disease                    | 43.7        |
| Chronic Obstructive Pulmonary Disease     | 59.8        |
| Diagnosed Diabetes                        | 29.7        |
| Life Expectancy at Birth                  | 21.8        |
| Cognitively Disabled                      | 48.3        |
| Physically Disabled                       | 20.3        |
| Heart Attack ER Admissions                | 27.8        |
| Mental Health Not Good                    | 48.5        |
| Chronic Kidney Disease                    | 35.4        |
| Obesity                                   | 49.6        |
| Pedestrian Injuries                       | 84.4        |
| Physical Health Not Good                  | 39.9        |
| Stroke                                    | 45.2        |
| Health Risk Behaviors                     | —           |
| Binge Drinking                            | 72.5        |
| Current Smoker                            | 58.7        |
| No Leisure Time for Physical Activity     | 38.5        |
| Climate Change Exposures                  | —           |

|                                  |      |
|----------------------------------|------|
| Wildfire Risk                    | 0.0  |
| SLR Inundation Area              | 0.0  |
| Children                         | 86.0 |
| Elderly                          | 37.4 |
| English Speaking                 | 33.1 |
| Foreign-born                     | 67.3 |
| Outdoor Workers                  | 59.2 |
| Climate Change Adaptive Capacity | —    |
| Impervious Surface Cover         | 32.6 |
| Traffic Density                  | 83.5 |
| Traffic Access                   | 62.3 |
| Other Indices                    | —    |
| Hardship                         | 66.0 |
| Other Decision Support           | —    |
| 2016 Voting                      | 27.0 |

### 7.3. Overall Health & Equity Scores

| Metric                                                                              | Result for Project Census Tract |
|-------------------------------------------------------------------------------------|---------------------------------|
| CalEnviroScreen 4.0 Score for Project Location (a)                                  | 81.0                            |
| Healthy Places Index Score for Project Location (b)                                 | 34.0                            |
| Project Located in a Designated Disadvantaged Community (Senate Bill 535)           | Yes                             |
| Project Located in a Low-Income Community (Assembly Bill 1550)                      | Yes                             |
| Project Located in a Community Air Protection Program Community (Assembly Bill 617) | No                              |

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

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

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

## 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

## 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

| Screen                                    | Justification                             |
|-------------------------------------------|-------------------------------------------|
| Land Use                                  | Information from site plan                |
| Construction: Construction Phases         | Estimated construction schedule           |
| Construction: Off-Road Equipment          | Assumed equipment based on project info   |
| Construction: Trips and VMT               | estimated haul truck trips for demolition |
| Operations: Hearths                       | No fireplace, no wood stoves              |
| Construction: Dust From Material Movement | estimated demo debris                     |
| Operations: Vehicle Data                  | info from traffic study                   |

## **APPENDIX B**

---

### Noise and Vibration Calculations

## Noise Formulas

### Noise Distance Attenuation

#### Hard Site

$$N_i = N_o - 20 * \text{LOG}(D_i/D_o)$$

**N<sub>i</sub>** = attenuated noise level of interest

**N<sub>o</sub>** = reference noise level

**D<sub>i</sub>** = distance to receptor (D<sub>i</sub>>D<sub>o</sub>)

**D<sub>o</sub>** = reference distance

**Source:** (Bolt, Beranek, and Newman, 1971)

### Summation of Noise Levels

**Equation:**  $N_s = 10 \times \text{LOG}_{10}((10^{(N_1/10)}) + (10^{(N_2/10)}) + (10^{(N_3/10)}) + (10^{(N_4/10)}))$

N<sub>s</sub> = Noise Level Sum

N<sub>1</sub> = Noise Level 1

N<sub>2</sub> = Noise Level 2

N<sub>3</sub> = Noise Level 3

N<sub>4</sub> = Noise Level 4

**Source:** California Department of Transportation, Technical Noise Supplement, 2013

| PHASED CONSTRUCTION NOISE LEVELS                                    |                              |
|---------------------------------------------------------------------|------------------------------|
| Construction Equipment                                              | Noise Level at 50 feet (dBA) |
| <b>DEMOLITION</b>                                                   |                              |
| Concrete Saw                                                        | 82.6                         |
| Backhoe/Loader                                                      | 73.6                         |
| Rubber Tired Dozer                                                  | 77.7                         |
| <b>Demolition Combined</b>                                          | <b>79.1</b>                  |
| <b>SITE PREPARATION</b>                                             |                              |
| Backhoe/Loader                                                      | 73.7                         |
| Excavator                                                           | 76.7                         |
| Rubber Tired Dozer                                                  | 77.7                         |
| <b>Site Preparation Combined</b>                                    | <b>80.2</b>                  |
| <b>Building Construction</b>                                        |                              |
| Backhoe/Loader                                                      | 73.7                         |
| Forklift (2)                                                        | 79.4                         |
| Welder (2)                                                          | 70.0                         |
| <b>Building Construction Combined</b>                               | <b>80.4</b>                  |
| <b>Architectural Coating</b>                                        |                              |
| Air Compressor (2)                                                  | 73.7                         |
| <b>Architectural Coating Combined</b>                               | <b>73.7</b>                  |
| <b>SOURCE:</b> FHWA, <i>Roadway Construction Noise Model</i> , 2008 |                              |

| SENSITIVE RECEPTORS                 |                                   |
|-------------------------------------|-----------------------------------|
| Sensitive Receptor                  | Distance from Project Site (Feet) |
| The Colony at the Lakes Apartments  | 70                                |
| East Valley Community Health Center | 325                               |
| Residences along Blue Ash Road      | 510                               |
| Residences along Bandy Avenue       | 535                               |
| <b>SOURCE:</b> TAHA, 2023.          |                                   |

**EXISTING AMBIENT NOISE LEVELS**

| Noise Measurement Site (Figure 1) | Noise Monitoring Location             |
|-----------------------------------|---------------------------------------|
| 1                                 | Blue Ash Road and Sandy Hook Street   |
| 2                                 | The Colony at the Lakes Apartments    |
| 3                                 | East Valley Community Health Center   |
| 4                                 | Bandy Avenue and Walnut Creek Parkway |
| 5                                 | Valinda Avenue and Waverly Place      |

**SOURCE:** TAHA, 2023.**CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS**

| Sensitive Receptors                 | Distance (feet) | Intervening Building /a/ | Reference Noise Level (dBA) | Max Construction Noise (dBA, Leq) | Existing Ambient (dBA, Leq) |
|-------------------------------------|-----------------|--------------------------|-----------------------------|-----------------------------------|-----------------------------|
| The Colony at the Lakes Apartments  | 70              | 0.0                      | 80.2                        | 77.3                              | 57.6                        |
| East Valley Community Health Center | 325             | 4.5                      | 80.2                        | 59.4                              | 59.9                        |
| Residences along Blue Ash Road      | 510             | 0.0                      | 80.2                        | 60.0                              | 52.2                        |
| Residences along Bandy Avenue       | 535             | 6.0                      | 80.2                        | 53.6                              | 54.0                        |

/a/ -4.5 dB for on intervening row of buildings and -1.5 dB for each subsequent row

**SOURCE:** TAHA, 2023.**ESTIMATED MOBILE SOURCE NOISE LEVELS**

| Roadway Segment                                                      | Estimated dBA, L <sub>eq</sub> |                     |                      |
|----------------------------------------------------------------------|--------------------------------|---------------------|----------------------|
|                                                                      | Existing                       | Future With Project | Incremental Increase |
| West Covina Parkway between Sunset Avenue and Vincent Avenue         | 66.5                           | 66.6                | 0.1                  |
| Vincent Avenue between West Covina Parkway and I-10 Freeway          | 68.1                           | 68.1                | 0                    |
| Lakes Drive between Vincent Avenue and Lakes Drive                   | 60.7                           | 60.9                | 0.2                  |
| Walnut Creek Parkway between Vincent Avenue and Glendora Avenue      | 58.5                           | 58.8                | 0.3                  |
| Glendora Avenue between Walnut Creek Parkway and Lakes Drive         | 63.9                           | 64.1                | 0.2                  |
| West Covina Parkway between Vincent Avenue and Glendora Avenue       | 66.6                           | 66.7                | 0.1                  |
| Glendora Avenue between West Covina Parkway and Walnut Creek Parkway | 63.2                           | 63.3                | 0.1                  |

**SOURCE:** TAHA, 2023



Site 1: Blue Ash Road and Sandy Hook Street





# Session Report

11/30/2022

## Information Panel

Name Walnut Creek APT\_Site1  
Start Time 11/17/2022 10:56:35 AM  
Stop Time 11/17/2022 11:11:35 AM  
Device Name BGS100001  
Model Type SoundPro DL  
Device Firmware Rev R.13J  
Comments

## Summary Data Panel

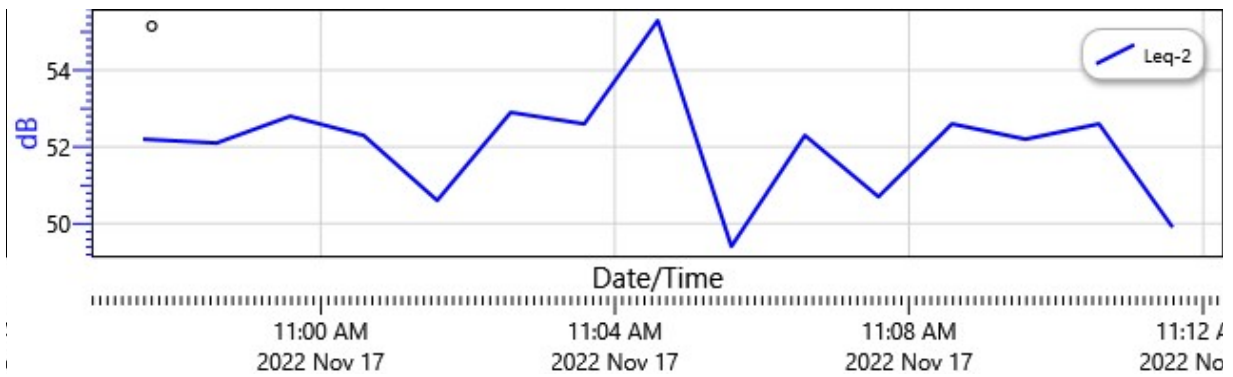
| Description   | Meter | Value   | Description | Meter | Value |
|---------------|-------|---------|-------------|-------|-------|
| Leq           | 1     | 52.2 dB |             |       |       |
| Exchange Rate | 1     | 3 dB    | Weighting   | 1     | A     |
| Response      | 1     | SLOW    | Bandwidth   | 1     | OFF   |
| Exchange Rate | 2     | 3 dB    | Weighting   | 2     | A     |
| Response      | 2     | SLOW    |             |       |       |

## Logged Data Table

| Date/Time              | Leq-2 |
|------------------------|-------|
| 11/17/2022 10:57:35 AM | 52.2  |
| 10:58:35 AM            | 52.1  |
| 10:59:35 AM            | 52.8  |
| 11:00:35 AM            | 52.3  |
| 11:01:35 AM            | 50.6  |
| 11:02:35 AM            | 52.9  |
| 11:03:35 AM            | 52.6  |
| 11:04:35 AM            | 55.3  |
| 11:05:35 AM            | 49.4  |
| 11:06:35 AM            | 52.3  |
| 11:07:35 AM            | 50.7  |
| 11:08:35 AM            | 52.6  |
| 11:09:35 AM            | 52.2  |
| 11:10:35 AM            | 52.6  |
| 11:11:35 AM            | 49.9  |

## Logged Data Chart

Walnut Creek APT\_Site1: Logged Data Chart



Site 2: The Colony at the Lakes Apartments



# Session Report

11/30/2022

## Information Panel

Name Walnut Creek APT\_Site2  
Start Time 11/17/2022 11:29:50 AM  
Stop Time 11/17/2022 11:44:50 AM  
Device Name BGS100001  
Model Type SoundPro DL  
Device Firmware Rev R.13J  
Comments

## Summary Data Panel

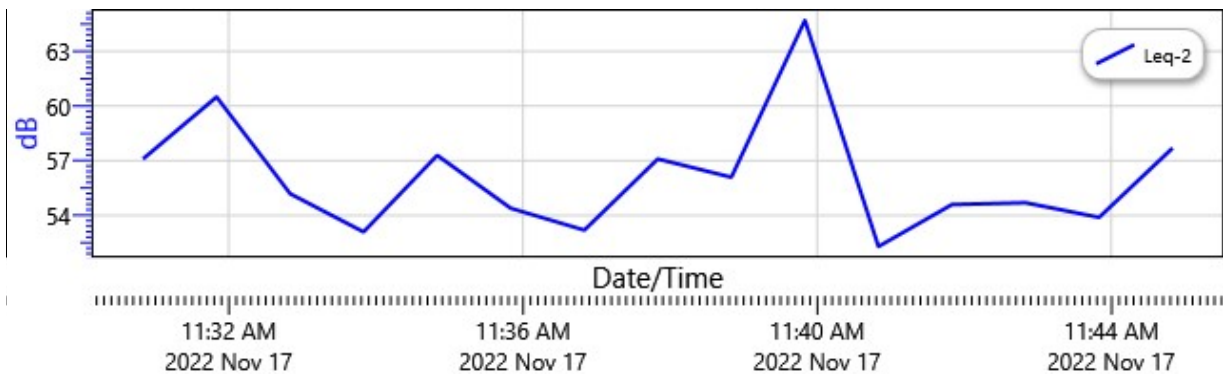
| Description   | Meter | Value   | Description | Meter | Value |
|---------------|-------|---------|-------------|-------|-------|
| Leq           | 1     | 57.6 dB |             |       |       |
| Exchange Rate | 1     | 3 dB    | Weighting   | 1     | A     |
| Response      | 1     | SLOW    | Bandwidth   | 1     | OFF   |
| Exchange Rate | 2     | 3 dB    | Weighting   | 2     | A     |
| Response      | 2     | SLOW    |             |       |       |

## Logged Data Table

| Date/Time              | Leq-2 |
|------------------------|-------|
| 11/17/2022 11:30:50 AM | 57.1  |
| 11:31:50 AM            | 60.5  |
| 11:32:50 AM            | 55.2  |
| 11:33:50 AM            | 53.1  |
| 11:34:50 AM            | 57.3  |
| 11:35:50 AM            | 54.4  |
| 11:36:50 AM            | 53.2  |
| 11:37:50 AM            | 57.1  |
| 11:38:50 AM            | 56.1  |
| 11:39:50 AM            | 64.7  |
| 11:40:50 AM            | 52.3  |
| 11:41:50 AM            | 54.6  |
| 11:42:50 AM            | 54.7  |
| 11:43:50 AM            | 53.9  |
| 11:44:50 AM            | 57.7  |

## Logged Data Chart

Walnut Creek APT\_Site2: Logged Data Chart





Site 3: East Valley Community Health Center



# Session Report

11/30/2022

## Information Panel

Name Walnut Creek APT\_Site3  
Start Time 11/17/2022 12:03:48 PM  
Stop Time 11/17/2022 12:18:48 PM  
Device Name BGS100001  
Model Type SoundPro DL  
Device Firmware Rev R.13J  
Comments

## Summary Data Panel

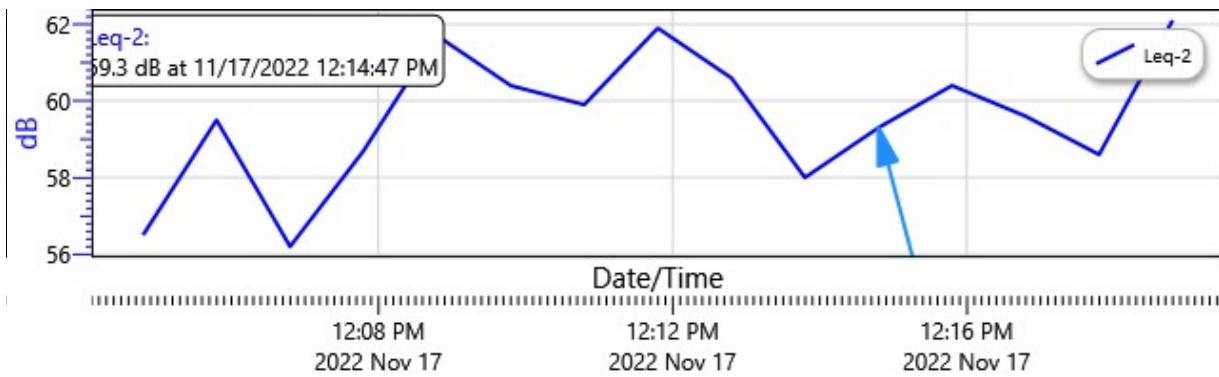
| Description   | Meter | Value   | Description | Meter | Value |
|---------------|-------|---------|-------------|-------|-------|
| Leq           | 1     | 59.9 dB |             |       |       |
| Exchange Rate | 1     | 3 dB    | Weighting   | 1     | A     |
| Response      | 1     | SLOW    | Bandwidth   | 1     | OFF   |
| Exchange Rate | 2     | 3 dB    | Weighting   | 2     | A     |
| Response      | 2     | SLOW    |             |       |       |

## Logged Data Table

| Date/Time              | Leq-2 |
|------------------------|-------|
| 11/17/2022 12:04:48 PM | 56.5  |
| 12:05:48 PM            | 59.5  |
| 12:06:48 PM            | 56.2  |
| 12:07:48 PM            | 58.7  |
| 12:08:48 PM            | 61.7  |
| 12:09:48 PM            | 60.4  |
| 12:10:48 PM            | 59.9  |
| 12:11:48 PM            | 61.9  |
| 12:12:48 PM            | 60.6  |
| 12:13:48 PM            | 58    |
| 12:14:48 PM            | 59.3  |
| 12:15:48 PM            | 60.4  |
| 12:16:48 PM            | 59.6  |
| 12:17:48 PM            | 58.6  |
| 12:18:48 PM            | 62.1  |

## Logged Data Chart

Walnut Creek APT\_Site3: Logged Data Chart





Site 4: Bandy Avenue and Walnut Creek Parkway



# Session Report

11/30/2022

## Information Panel

Name Walnut Creek APT\_Site4  
Start Time 11/17/2022 12:26:11 PM  
Stop Time 11/17/2022 12:41:11 PM  
Device Name BGS100001  
Model Type SoundPro DL  
Device Firmware Rev R.13J  
Comments

## Summary Data Panel

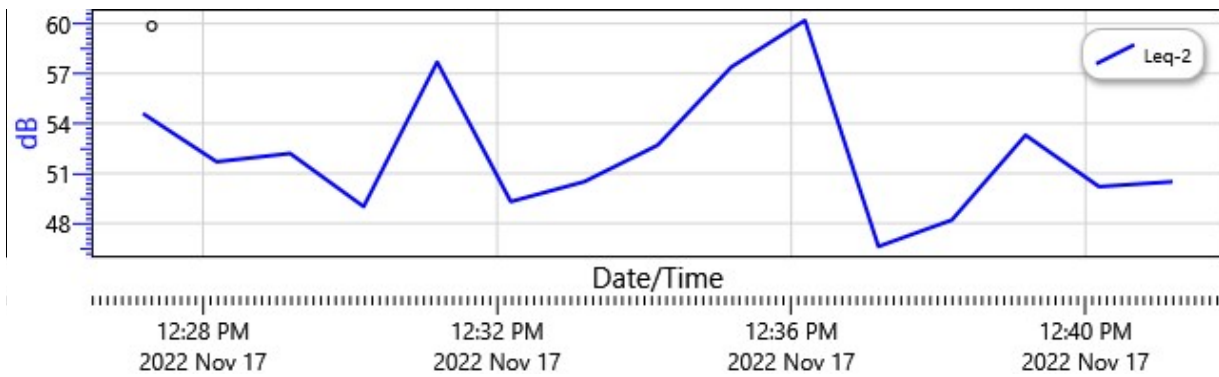
| Description   | Meter | Value | Description | Meter | Value |
|---------------|-------|-------|-------------|-------|-------|
| Leq           | 1     | 54 dB |             |       |       |
| Exchange Rate | 1     | 3 dB  | Weighting   | 1     | A     |
| Response      | 1     | SLOW  | Bandwidth   | 1     | OFF   |
| Exchange Rate | 2     | 3 dB  | Weighting   | 2     | A     |
| Response      | 2     | SLOW  |             |       |       |

## Logged Data Table

| Date/Time              | Leq-2 |
|------------------------|-------|
| 11/17/2022 12:27:11 PM | 54.6  |
| 12:28:11 PM            | 51.7  |
| 12:29:11 PM            | 52.2  |
| 12:30:11 PM            | 49    |
| 12:31:11 PM            | 57.7  |
| 12:32:11 PM            | 49.3  |
| 12:33:11 PM            | 50.5  |
| 12:34:11 PM            | 52.7  |
| 12:35:11 PM            | 57.4  |
| 12:36:11 PM            | 60.2  |
| 12:37:11 PM            | 46.6  |
| 12:38:11 PM            | 48.2  |
| 12:39:11 PM            | 53.3  |
| 12:40:11 PM            | 50.2  |
| 12:41:11 PM            | 50.5  |

## Logged Data Chart

Walnut Creek APT\_Site4: Logged Data Chart





Site 5: Valinda Avenue and Waverly Place



# Session Report

11/30/2022

## Information Panel

Name Walnut Creek APT\_Site5  
Start Time 11/17/2022 12:53:07 PM  
Stop Time 11/17/2022 1:08:07 PM  
Device Name BGS100001  
Model Type SoundPro DL  
Device Firmware Rev R.13J  
Comments

## Summary Data Panel

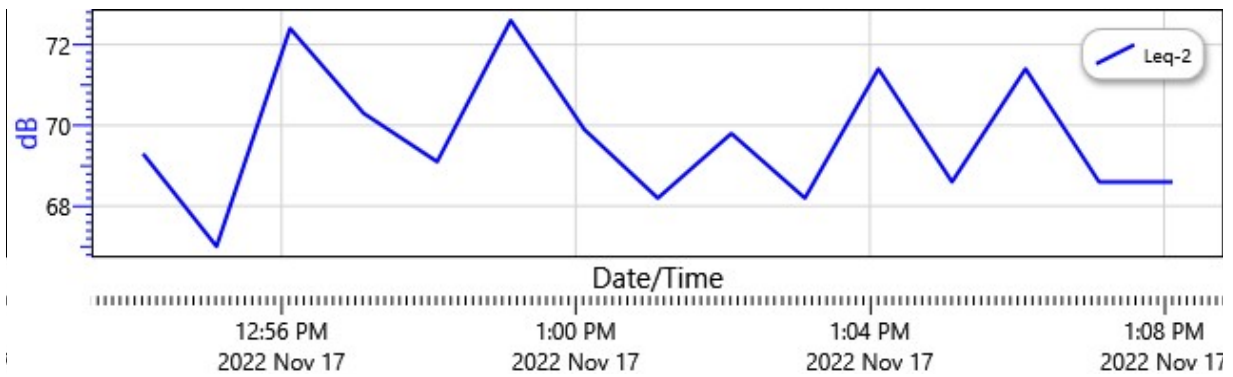
| Description   | Meter | Value | Description | Meter | Value |
|---------------|-------|-------|-------------|-------|-------|
| Leq           | 1     | 70 dB |             |       |       |
| Exchange Rate | 1     | 3 dB  | Weighting   | 1     | A     |
| Response      | 1     | SLOW  | Bandwidth   | 1     | OFF   |
| Exchange Rate | 2     | 3 dB  | Weighting   | 2     | A     |
| Response      | 2     | SLOW  |             |       |       |

## Logged Data Table

| Date/Time              | Leq-2 |
|------------------------|-------|
| 11/17/2022 12:54:07 PM | 69.3  |
| 12:55:07 PM            | 67    |
| 12:56:07 PM            | 72.4  |
| 12:57:07 PM            | 70.3  |
| 12:58:07 PM            | 69.1  |
| 12:59:07 PM            | 72.6  |
| 1:00:07 PM             | 69.9  |
| 1:01:07 PM             | 68.2  |
| 1:02:07 PM             | 69.8  |
| 1:03:07 PM             | 68.2  |
| 1:04:07 PM             | 71.4  |
| 1:05:07 PM             | 68.6  |
| 1:06:07 PM             | 71.4  |
| 1:07:07 PM             | 68.6  |
| 1:08:07 PM             | 68.6  |

## Logged Data Chart

Walnut Creek APT\_Site5: Logged Data Chart



## REPORT:

## Results: Sound Levels - No Barrier Objects

TNM VERSION

3.1.7970.37608

REPORT DATE:

29 November 2022

CALCULATED WITH:

3.1.7970.37608

CALCULATION DATE:

11/29/2022 4:36:05 PM

CASE:

Walnut Creek\_Existing

ORGANIZATION:

UNITS:

English

ANALYSIS BY:

KTo

DEFAULT GROUND TYPE:

HardSoil

PROJECT/CONTRACT

ATMOSPHERICS:

68°F, 50%

Average pavement type shall be used unless a state

PAVEMENT TYPE(S) USED:

Average

highway agency substantiates the use of a different

type with approval FHWA.

| Receiver                                              |     |             |                                 | Modeled Traffic Noise Levels |                       |                        |                       |                      |  |
|-------------------------------------------------------|-----|-------------|---------------------------------|------------------------------|-----------------------|------------------------|-----------------------|----------------------|--|
| Name                                                  | No. | Nb.<br>R.R. | Existing<br><br>LAeq<br><br>dBA |                              |                       |                        |                       |                      |  |
|                                                       |     |             |                                 | LAeq                         |                       | Increase over Existing |                       | Type<br>of<br>Impact |  |
|                                                       |     |             |                                 | Calc.                        | Absolute<br>Criterion | Calc.                  | Relative<br>Criterion |                      |  |
|                                                       |     |             |                                 | dBA                          | dBA                   | dBA                    | dBA                   |                      |  |
| West Covina Pkwy btw Vincent Ave and Glendora Ave     | 1   | 1           | ---                             | 66.6                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Glendora Ave btw West Covina Pkwy and Walnut Creek    | 2   | 1           | ---                             | 63.2                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Walnut Creek Parkway btw Vincent Ave and Glendora Ave | 3   | 1           | ---                             | 58.5                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Glendora Ave btw Walnut Creek and Lakes Dr            | 4   | 1           | ---                             | 63.9                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Lakes Dr btw Vincent Ave and Lakes Dr                 | 5   | 1           | ---                             | 60.7                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Vincent Ave btw West Covina Pkwy and i10              | 6   | 1           | ---                             | 68.1                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| West Covina Pkwy btw Sunset Ave and Vincent Ave       | 7   | 1           | ---                             | 66.5                         | 0.0                   | ---                    | ---                   | Sound Level          |  |



## REPORT:

## Results: Sound Levels - No Barrier Objects

TNM VERSION

3.1.7970.37608

REPORT DATE:

29 November 2022

CALCULATED WITH:

3.1.7970.37608

CALCULATION DATE:

11/29/2022 4:37:14 PM

CASE:

Walnut Creek\_Future

ORGANIZATION:

UNITS:

English

ANALYSIS BY:

KTo

DEFAULT GROUND TYPE:

HardSoil

PROJECT/CONTRACT

ATMOSPHERICS:

68°F, 50%

Average pavement type shall be used unless a state

PAVEMENT TYPE(S) USED:

Average

highway agency substantiates the use of a different

type with approval FHWA.

| Receiver                                              |     |             |                                 | Modeled Traffic Noise Levels |                       |                        |                       |                      |  |
|-------------------------------------------------------|-----|-------------|---------------------------------|------------------------------|-----------------------|------------------------|-----------------------|----------------------|--|
| Name                                                  | No. | Nb.<br>R.R. | Existing<br><br>LAeq<br><br>dBA |                              |                       |                        |                       |                      |  |
|                                                       |     |             |                                 | LAeq                         |                       | Increase over Existing |                       | Type<br>of<br>Impact |  |
|                                                       |     |             |                                 | Calc.                        | Absolute<br>Criterion | Calc.                  | Relative<br>Criterion |                      |  |
|                                                       |     |             |                                 | dBA                          | dBA                   | dBA                    | dBA                   |                      |  |
| West Covina Pkwy btw Vincent Ave and Glendora Ave     | 1   | 1           | ---                             | 66.7                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Glendora Ave btw West Covina Pkwy and Walnut Creek    | 2   | 1           | ---                             | 63.3                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Walnut Creek Parkway btw Vincent Ave and Glendora Ave | 3   | 1           | ---                             | 58.8                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Glendora Ave btw Walnut Creek and Lakes Dr            | 4   | 1           | ---                             | 64.1                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Lakes Dr btw Vincent Ave and Lakes Dr                 | 5   | 1           | ---                             | 60.9                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| Vincent Ave btw West Covina Pkwy and i10              | 6   | 1           | ---                             | 68.1                         | 0.0                   | ---                    | ---                   | Sound Level          |  |
| West Covina Pkwy btw Sunset Ave and Vincent Ave       | 7   | 1           | ---                             | 66.6                         | 0.0                   | ---                    | ---                   | Sound Level          |  |



## **APPENDIX C**

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### Traffic Assessment



March 6, 2023

Mr. Mark Gabay  
President  
Excel Property Management Services, Inc.  
9034 W. Sunset Boulevard  
West Hollywood, CA 90069

**RE: Traffic Assessment for the Proposed 51-Unit Townhome Project at 658 Walnut Creek Parkway**

Dear Mr. Gabay,

AGA Engineers, Inc. (AGA) is pleased to present to you this letter report for the traffic assessment for the proposed 51-unit townhome project at 658 Walnut Creek Parkway in the City of West Covina. This report is based on discussion with the project team, comments from City staff (see attached) and the proposed site plan (attached).

The proposed project site consists of the development of 51 townhomes on an existing vacant parking lot. The proposed project includes 41 one-bedroom units and ten two-bedroom units within three floors. The project will have an underground parking garage that will provide 84 parking stalls that includes five guest parking stalls. City staff evaluated the project trip generation and Vehicle Miles Traveled (VMT) assessment and stated that per City guidelines, a full traffic study and VMT analysis are not required. However, City staff had provided comments on the project and requested a traffic assessment be evaluated for the project. The tasks associated with the traffic assessment are as follows.

**Project Description**

As stated, the project consists of a total of 51 townhomes on an existing parking lot. The project is located on Walnut Creek Parkway between Vincent Avenue and Glendora Avenue (see **Figure 1**). The I-10 freeway is located to the north of the project site and the Plaza West Covina is located to the west. Walnut Creek Parkway is a four-lane roadway at the project driveway and a two-lane roadway just west of the project site. The speed limit along Walnut Creek Parkway is 25 mph and No Stopping Anytime signs are posted along both sides of Walnut Creek Parkway.

AGA Engineers, Inc.  
211 Imperial Highway, Suite 208, Fullerton, CA 92835  
(714) 992-4592 Email: [aga@agaengineersinc.com](mailto:aga@agaengineersinc.com)



Figure 1. Project Location

The project will have one driveway (24 feet wide) on Walnut Creek Parkway with full ingress and egress movements. The parking garage will be situated underground. There will be a gate to enter the parking garage which will open away from incoming vehicles and will be set back 20 feet south of the sidewalk, which will allow for one vehicle to wait at the gate and not block the crosswalk (see **Figure 2**).

There will be a total of 84 parking stalls that includes four standard accessible parking stalls, and five guest parking



Figure 2. Project Driveway

stalls. The drive aisles width within the parking garage ranges from 24' to 28'-6". A detailed plan for the parking garage is attached. As shown on **Figure 2**, the trash bins will be stored on site and enclosed. Placement of the trash bins for collection are to be placed outside and will not interfere with pedestrian traffic on the sidewalk or interfere with the sight distance for vehicles exiting the project driveway.

### Project Trip Generation

City staff required a project trip generation analysis to determine the proposed project trips (daily, AM peak hour, PM peak hour). The trip generation analysis utilized the Institute of Transportation Engineers (ITE) Trip Generation Manual (11<sup>th</sup> Edition). Per the City of West Covina traffic impact analysis guidelines, a full traffic study (Level-of-Service (LOS) analysis) is required if the proposed project is expected to generate a net peak hour project trips of 50 AM or PM peak hour trips. Based on the project description, ITE Code 220, Multifamily Housing (Low-Rise) was used for the trip generation analysis. The trip generation analysis (see **Project Trip Generation table below**) showed that the project is expected to generate 21 AM peak hour trip and 26 pm peak hour trips which is below the minimum requirement of 50 peak hour trips. Therefore, a full traffic study is not required for this project.

#### Project Trip Generation

| ITE Trip Generation Rates <sup>1</sup> - Weekday                               |                     |       |                                                 |       |       |                                                 |       |       |
|--------------------------------------------------------------------------------|---------------------|-------|-------------------------------------------------|-------|-------|-------------------------------------------------|-------|-------|
| ITE Code - Land Use                                                            | Rate per            | Daily | AM Peak Hour<br><i>(one hour between 7-9am)</i> |       |       | PM Peak Hour<br><i>(one hour between 4-6pm)</i> |       |       |
|                                                                                |                     |       | In                                              | Out   | Total | In                                              | Out   | Total |
| ITE 220, Multifamily Housing (Low-Rise)                                        | DU - Dwelling Units | 6.74  | 0.096                                           | 0.304 | 0.400 | 0.321                                           | 0.189 | 0.510 |
| Percentages                                                                    |                     | 100%  | 24%                                             | 76%   | 100%  | 63%                                             | 37%   | 100%  |
| Project Trip Generation <sup>1</sup> - Weekday                                 |                     |       |                                                 |       |       |                                                 |       |       |
| ITE Code - Land Use                                                            | Square Footage      | Daily | AM Peak Hour                                    |       |       | PM Peak Hour                                    |       |       |
|                                                                                |                     |       | In                                              | Out   | Total | In                                              | Out   | Total |
| Walnut Creek Pkwy Residential Project (ITE 220, Multifamily Housing (Low-Rise) | 51 DU               | 344   | 5                                               | 16    | 21    | 16                                              | 10    | 26    |
| Net New Project Trips                                                          |                     | 344   | 5                                               | 16    | 21    | 16                                              | 10    | 26    |

<sup>1</sup> Institute of Transportation Engineers (ITE), Trip Generation Manual, 11th Ed.

**Peak Hour Threshold = 50 Total Trips**

**21 AM Trips & 26 PM Trips**

**LOS Analysis Not Required**



## Vehicle Miles Traveled (VMT) Assessment

In the past, the Level-of-Service (LOS) was analyzed per the California Environmental Quality Act (CEQA) for any potential impacts a proposed development may have on the surrounding area. Today, the main goal of the State is to reduce greenhouse gases. One key measurement to obtain this goal is to reduce the number of vehicle miles traveled (VMT) by motorists. Therefore, as of July 1, 2020, VMT evaluation is required in lieu of the LOS analysis. The City has developed VMT guidelines, but will still require LOS analysis and will be a separate document from the CEQA documents. The new CEQA guidelines favor local projects over regional projects as the local projects tend to reduce the VMT for motorists.

It should be noted that a project could be screened out from VMT analysis based on various criteria. City staff has stated that since Glendora Avenue is considered a Transit Priority Location (TPA) route and the project is located within a half-mile of a TPA route, it is exempt from Vehicles Miles Traveled (VMT) analysis. AGA verified that there are multiple transit services within a half mile of the project site with transit routes west to Los Angeles, north to Duarte, east to Montclair and south to Puente Hills Mall (City of Industry). **Figure 3** shows the nearest bus stops to the project site and the associated transit routes.



**Figure 3. Nearby Bus Stops with Associated Transit Routes**

Along with the project site being located within ½ mile of a TPA route, the project may not be appropriate if the project has any of the following:

- Floor Area Ratio (FAR) of less than 0.75;
  - Pass, the project FAR = 1.38
- Includes more parking for use by residents, customers or employees of the project than required by City
  - Pass, The project is proposing parking spaces per City requirement.
- Is inconsistent with applicable Sustainable Communities Strategy or Replaces affordable housing units with a smaller number of moderate or high income units
  - Pass, the project is not replacing affordable housing.

The project does not have a FAR less than 0.75, provides parking required by the City and is not replacing affordable housing. Therefore, this project can be screened from VMT analysis.

### **Sight Distance Analysis for Project Driveway**

City staff requested a corner sight distance evaluation be conducted utilizing guidelines from the American Association of State Highway and Transportation Officials (AASHTO) for vehicles exiting and entering the project driveway onto Walnut Creek Parkway. AASHTO guidelines state that the driver from the side street (project driveway) is setback 15 feet from the center of the opposing lane. This is usually for roadways with wider lanes and shoulders and where stop bars are situated. Typically, a driver on the side street will stop at the stop bar and then approach the main street to look for oncoming vehicles. For this project sight distance analysis, the front of the vehicle was situated at the extension of the curb on Walnut Creek Parkway. Therefore, the driver setback is eight feet from the curb extension. Based on AASHTO corner sight distance requirements for 25 mph (speed limit on Walnut Creek Parkway), a sight distance of 280 feet for vehicles exiting northbound left and a sight distance of 240 feet for vehicles exiting northbound right was utilized in the analysis (see **Figures 4A, 4B and 5**). Based on the analysis, the project building could impact the corner sight distance for a motorist at the driveway, looking west. However, based on the Caltrans Highway Design Manual (HDM), corner sight distance requirements are not applied to urban driveways unless signalized (see attached). Therefore, AGA developed two additional sight distance assessments as shown below.

- *Stopping Sight Distance Evaluation for Eastbound and Westbound on Walnut Creek Parkway:* A stopping sight distance analysis on Walnut Creek Parkway was evaluated to determine if a driver on Walnut Creek Parkway has enough sight distance to stop for a vehicle exiting the project driveway. Per the Caltrans HDM, the stopping sight distance for 25 mph is 150 feet. **Figure 6** shows the stopping sight distance analysis. Based on the

stopping sight distance analysis, there is adequate stopping sight distance for vehicles on Walnut Creek Parkway.

- o *Corner Sight Distance using Stopping Sight Distance Criteria.* Per the Caltrans HDM, the minimum corner sight distance used for signalized intersections should be equal to the stopping sight distance. Although this intersection is not signalized, a corner sight distance was evaluated using the stopping sight distance (150 feet). Based on that assessment (see **Figure 7**), there is adequate corner sight distance when utilizing the minimum requirement.

Based on the corner sight distance analysis per AASHTO guidelines, the building is situated against the sidewalk and could interfere with the sight distance for a vehicle exiting the driveway. Based on the Caltrans HDM methodology, where it states that corner sight distance is not to be utilized for an urban driveway, the minimum corner sight distance and stopping sight distance analyses show there is adequate sight distance for this project driveway.

For westbound vehicles on Walnut Creek Parkway turning left into the project driveway, the AASHTO guidelines for left turn from major street was utilized. The sight distance for this criterion (25 mph) is 205 feet. Based on the analysis (see **Figure 8**), there is adequate sight distance for a vehicle turning westbound left turn from Walnut Creek Parkway into the project driveway.

## **Construction Impacts**

To ensure impacts to the surrounding street system are kept at minimum, it is recommended that a Construction Management Plan for the proposed Project be developed. The Construction Management Plan should be developed in coordination with the City and at a minimum, address the following:

- Traffic control for any street closure, detour, or other disruption to traffic circulation.
- Identify the routes that construction vehicles will utilize for the delivery of construction materials (i.e. lumber, tiles, piping, windows, etc.), to access the site, traffic controls and detours, and proposed construction phasing plan for the project.
- Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.
- Require the Applicant to keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Applicant shall clean adjacent streets, as directed by the City Engineer (or representative of the City Engineer), of any material which may have been spilled, tracked, or blown onto adjacent streets or areas.
- Hauling or transport of oversize loads will be allowed between the hours of 9:00 AM and 3:00 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport will be allowed during nighttime hours, weekends or Federal holidays.

- Use of local streets shall be prohibited.
- Haul trucks entering or exiting public streets shall at all times yield to public traffic.
- If hauling operations cause any damage to existing pavement, street, curb, and/or gutter along the haul route, the applicant will be fully responsible for repairs. The repairs shall be completed to the satisfaction of the City Engineer.
- All construction-related parking and staging of vehicles will be kept out of the adjacent public roadways and will occur on-site.
- This Plan shall meet standards established in the current *California Manual on Uniform Traffic Control Devices (MUTCD)* as well as City requirements.
- Traffic control plans should meet standards/guidelines per the Work Area Traffic Control Handbook (WATCH), California Temporary Traffic Control Handbook and/or policies provided by the City.

## Summary of Findings

An existing vacant parking lot located at 658 Walnut Creek Parkway in the City of West Covina is to be converted into 51-unit townhomes. The development will include an underground parking garage with 84 parking spaces. The access to and from the parking garage will be via the project's driveway off Walnut Creek Parkway, which is expected to have full ingress and egress movements. The project driveway will be gated and the gate will be located 20 feet away from sidewalk to allow for one vehicle to wait at the gate and not interfere with pedestrians on the adjacent sidewalk. On trash pickup days, the trash bins are to be set out as to not interfere with pedestrian traffic on the sidewalk and not interfere with the sight distance for vehicles exiting the project driveway.

A trip generation analysis was conducted based on ITE *Trip Generation Manual* rates. The project is expected to generate 344 daily trips, 21 AM peak hour trips and 26 PM peak hour trips. These trips will be using the existing roadway network. The City of West Covina's Traffic Study Guidelines require full traffic analysis conducted for projects that are expected to generate 50 AM or PM peak hour trips. Since the project is expected to generate less than 50 AM or PM peak hour trips, a full traffic analysis is not required for this project.

Based on a Vehicle Miles Traveled (VMT) assessment of the project, this project can be screened out for VMT analysis since it is located within a Transit Priority Location (TPA) and that there are many existing transit routes easily accessible from the project site. The project also does not have a FAR less than 0.75, does not have more parking than required by the City and is not replacing affordable housing.

Based on the driveway corner sight distance analysis per AASHTO guidelines, the building could interfere with the sight distance for a vehicle exiting the driveway. Based on the Caltrans HDM methodology,



Mr. Mark Gabay

March 6, 2023

Page 8 of 8

where it states that corner sight distance is not to be utilized for an urban driveway, the minimum corner sight distance and stopping sight distance analyses show there is adequate sight distance for this project driveway. For westbound vehicles on Walnut Creek Parkway turning left into the project driveway, there is adequate sight distance for a vehicle turning westbound left turn from Walnut Creek Parkway into the project driveway.

To ensure construction impacts to the surrounding area are kept at minimum, a Construction Management Plan should be developed for this project. The Construction Management Plan should meet the City's policies and guidelines and also the standards established in the current California Manual on Uniform Traffic Control Devices (MUTCD), Work Area Traffic Control Handbook (WATCH) and California Temporary Traffic Control Handbook.

Should you have any questions regarding this report, please do not hesitate to contact me. We look forward to working with you on this project.

Respectfully submitted,

AGA Engineers, Inc.

Greg Wong, P.E.

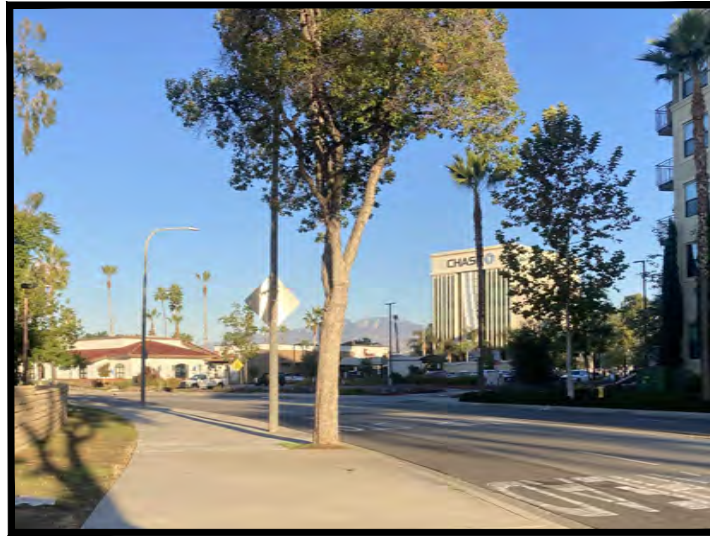
Vice President



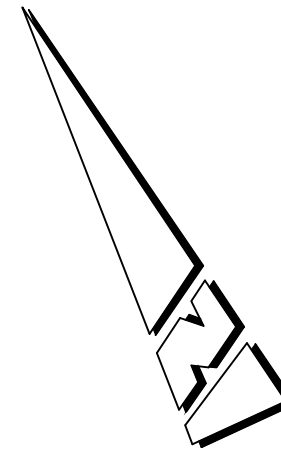
Attachment –City Comments Regarding Traffic Scoping, Proposed Project Site Plan, Proposed Project Parking Level Plan, Excerpts from Caltrans Highway Design Manual

R:\PROPOSALS\TAHA Environmental Planners\Report\AGA Engineers, Inc. - Traffic Assessment Memo for 51 MFDU at 658 Walnut Creek Pkwy.docx

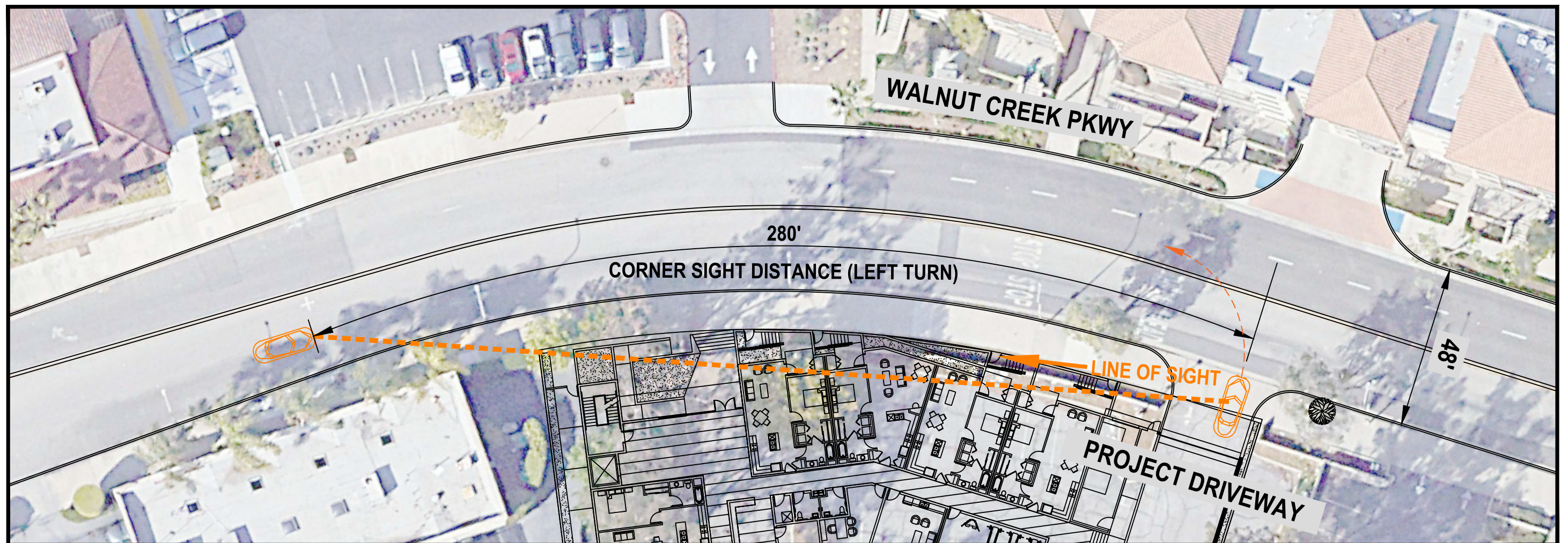




LINE OF SIGHT - LOOKING WEST FROM  
VEHICLE EXITING PROJECT DRIVEWAY

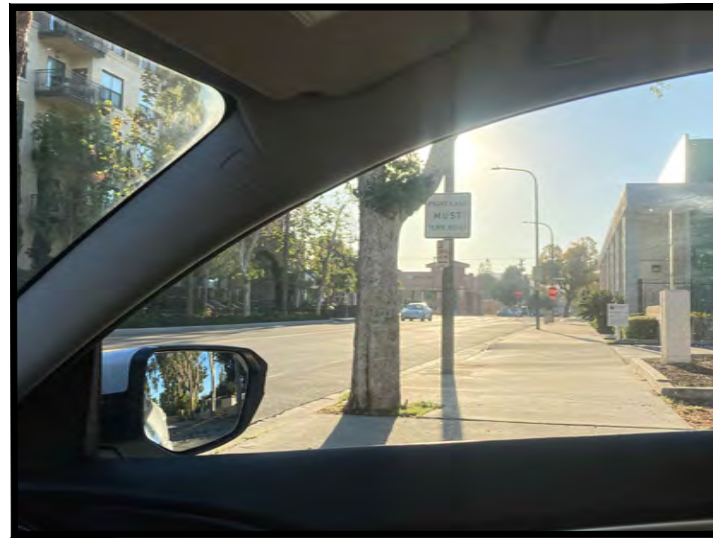


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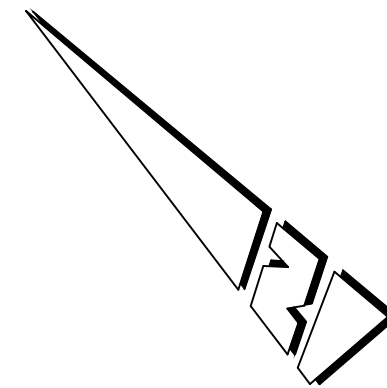


\* Driver's eye is 8' from curb line extension

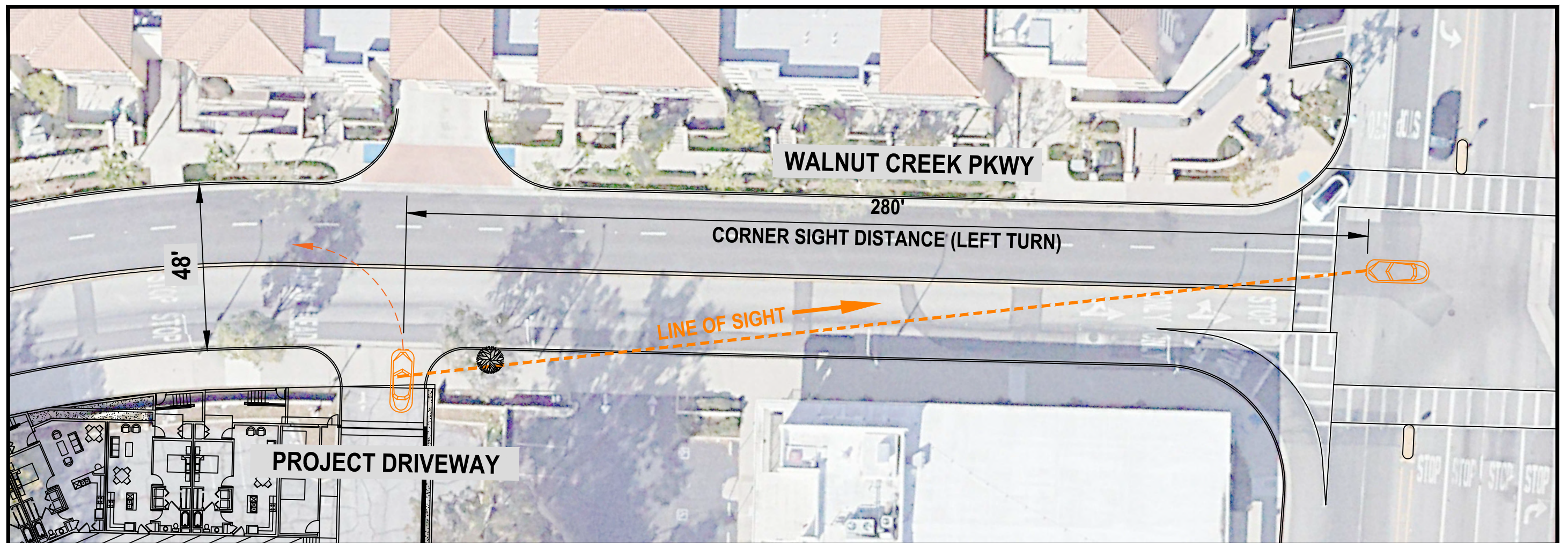




LINE OF SIGHT - LOOKING EAST FROM  
VEHICLE EXITING PROJECT DRIVEWAY

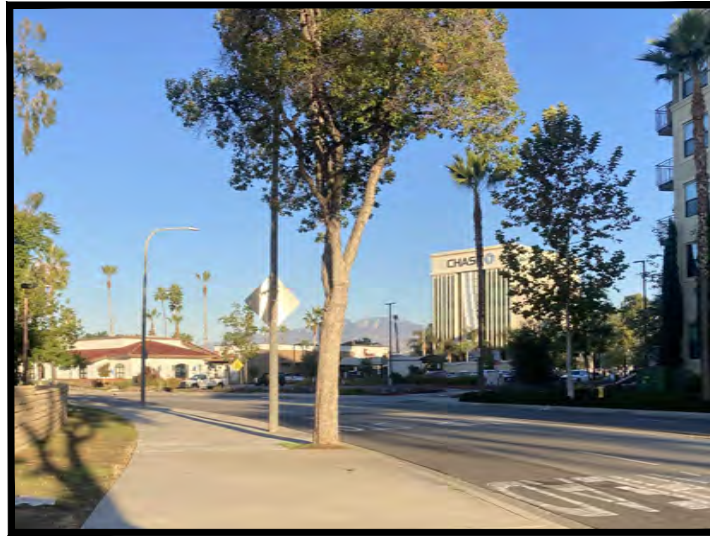


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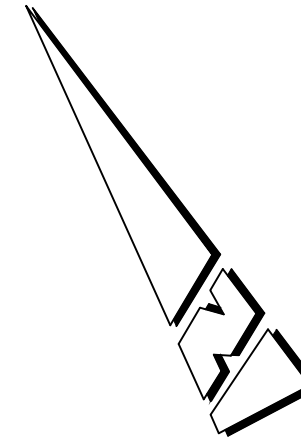


\* Driver's eye is 8' from curb line extension

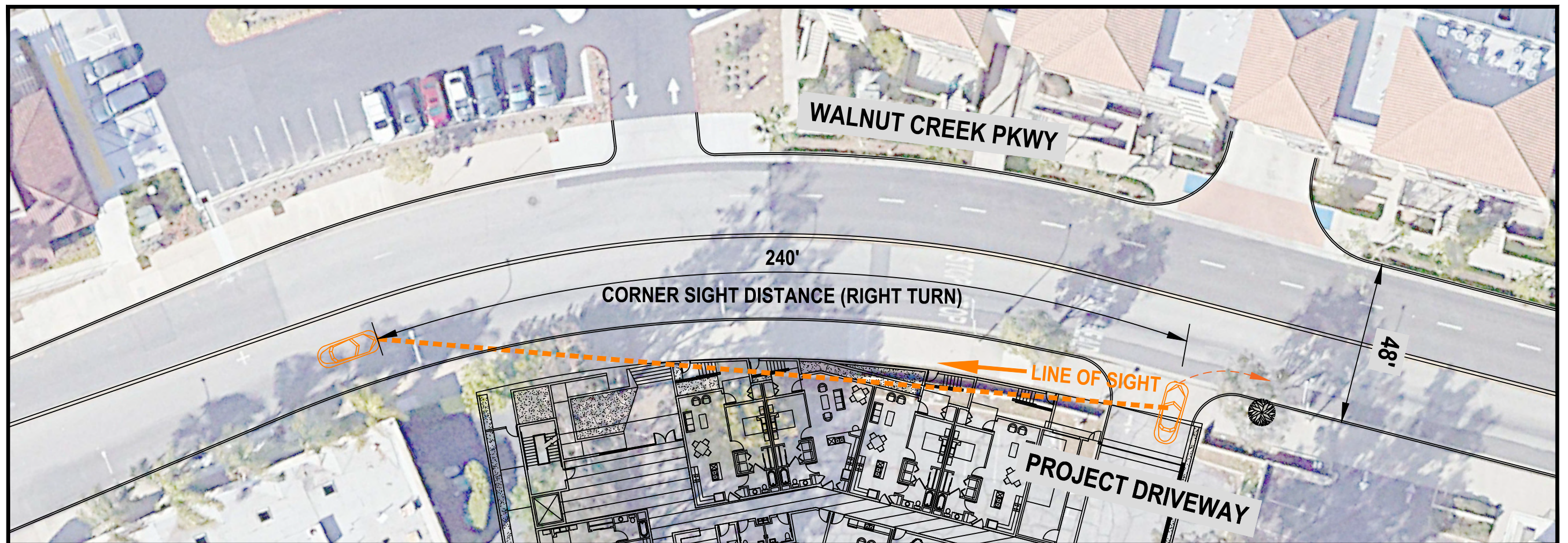




LINE OF SIGHT - LOOKING WEST FROM  
VEHICLE EXITING PROJECT DRIVEWAY



SCALE: 1"=30'

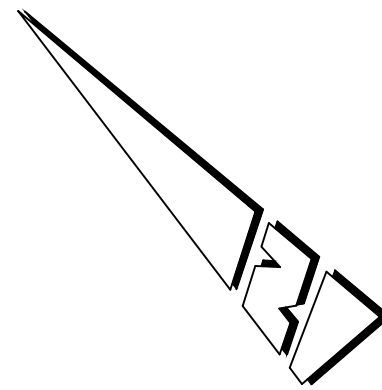


\* Driver's eye is 8' from curb line extension

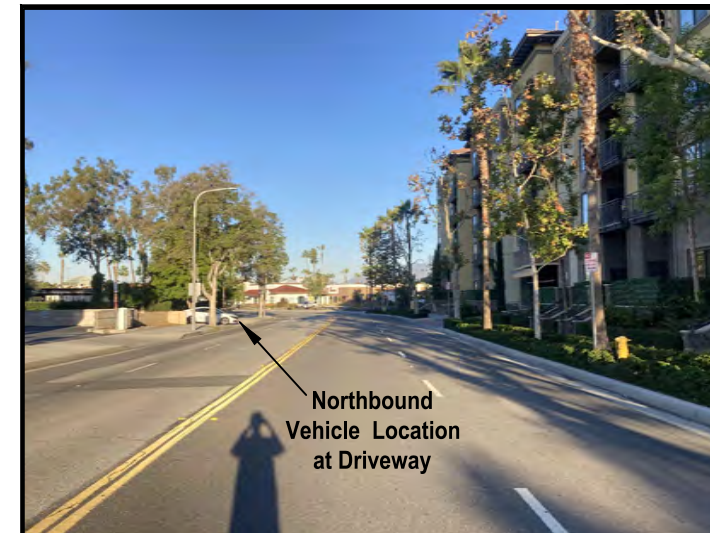




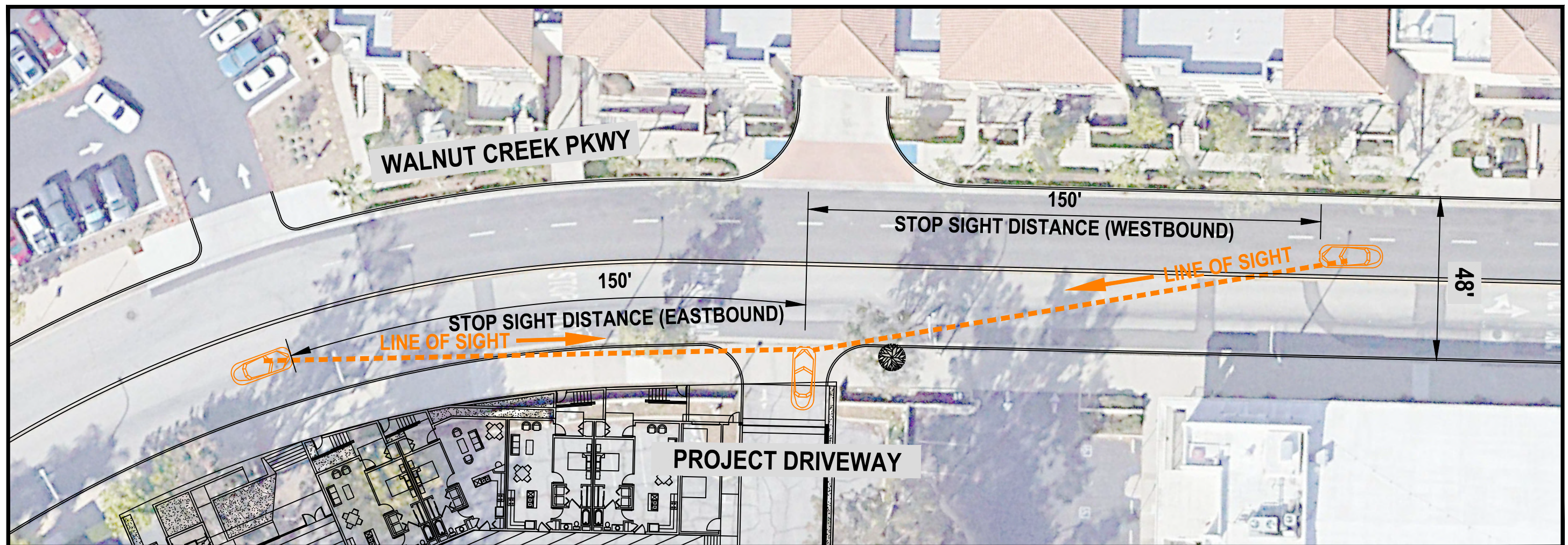
LINE OF SIGHT - EASTBOUND APPROACHING  
VEHICLE ON WALNUT CREEK PARKWAY



SCALE: 1"=30'

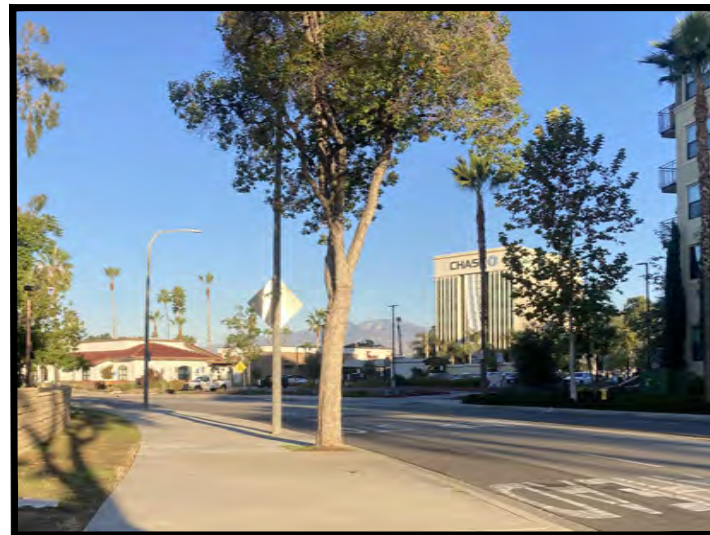


LINE OF SIGHT - WESTBOUND APPROACHING  
VEHICLE ON WALNUT CREEK PARKWAY

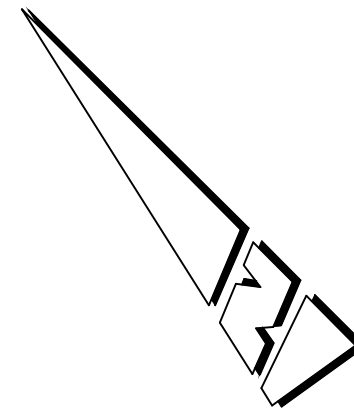


\* Nose of vehicle is at curb line extension





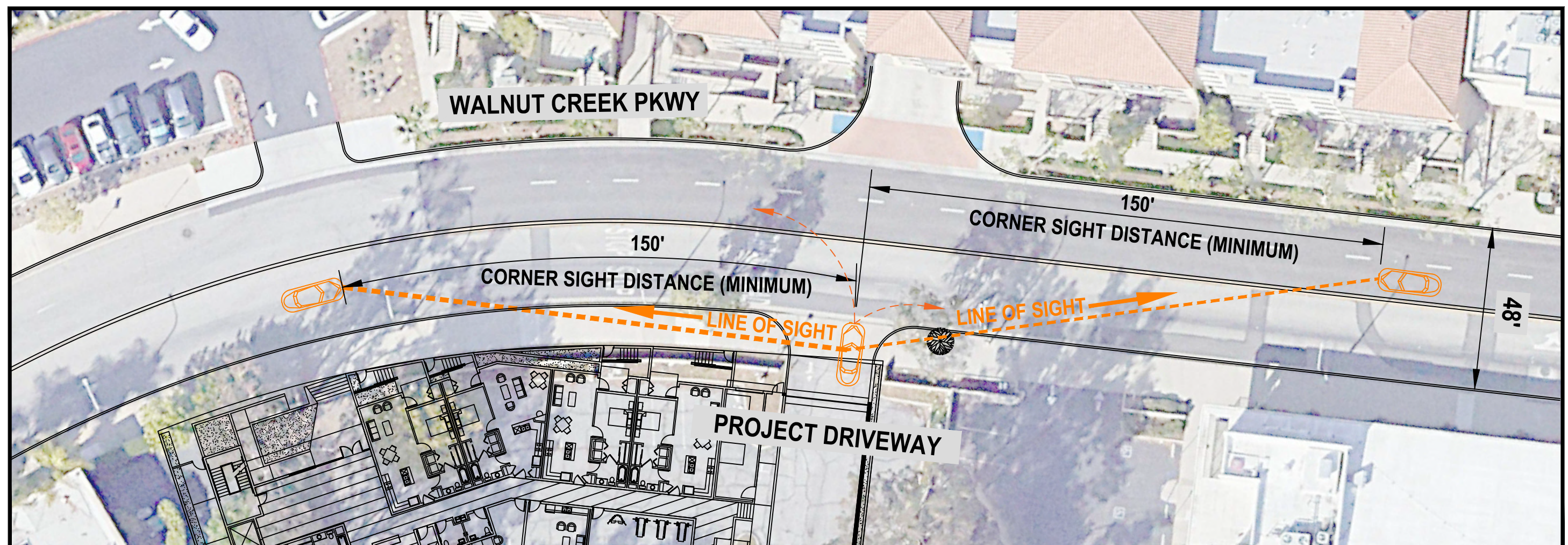
LINE OF SIGHT - LOOKING WEST FROM  
VEHICLE EXITING PROJECT DRIVEWAY



SCALE: 1"=30'



LINE OF SIGHT - LOOKING EAST FROM  
VEHICLE EXITING PROJECT DRIVEWAY

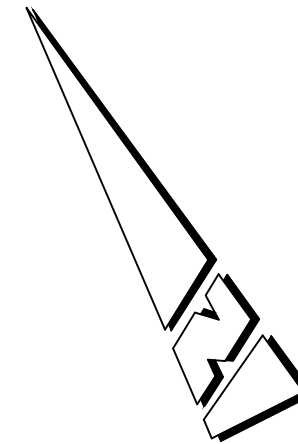


\* Driver's eye is 8' from curb line extension

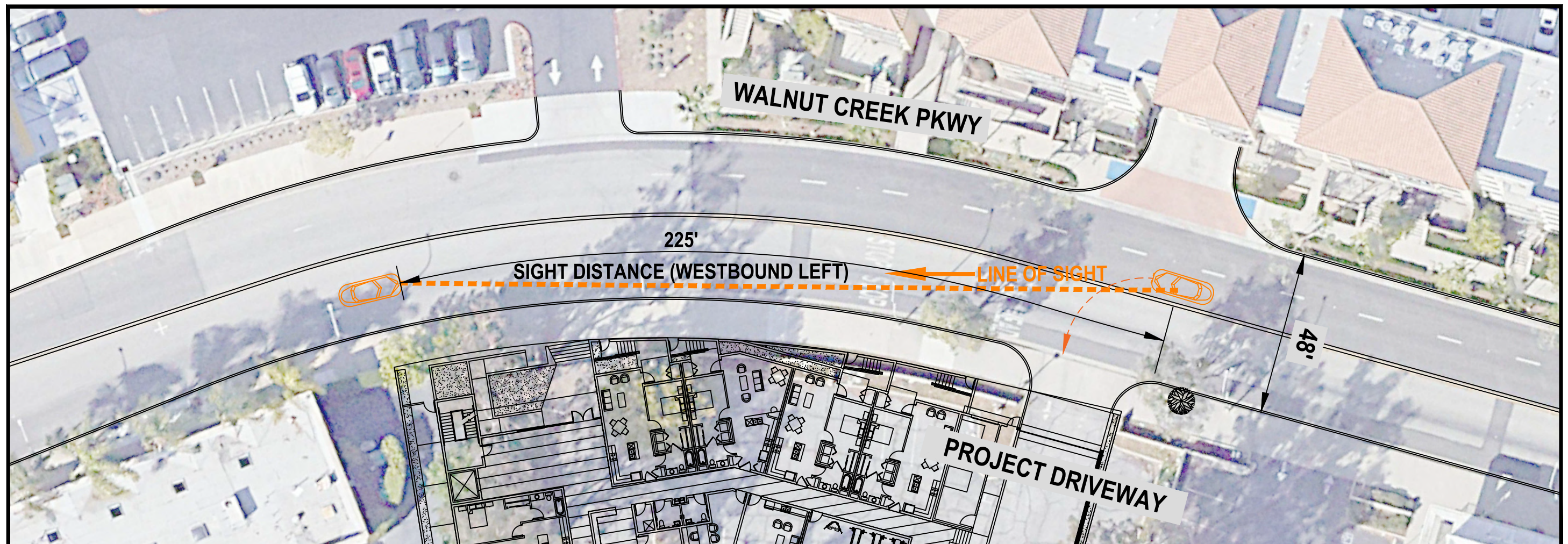




LINE OF SIGHT - LOOKING WEST FROM WESTBOUND  
LEFT TURN VEHICLE ENTERING PROJECT DRIVEWAY



SCALE: 1"=30'





## **ATTACHMENTS**

- **City Comments Regarding Traffic Scoping**
- **Proposed Project Site Plan**
- **Proposed Project Parking Level Plan**
- **Excerpts from Caltrans Highway Design Manual**
  - o **Pages from Sections 200 and 400 - Urban Driveways**



*658 Walnut Creek Parkway  
Residential Project*  
**City Comments Regarding Traffic Scoping**

**Attachment**





**Date: September 26, 2022**

|       |                                                                                                                                                                             |        |                             |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----------------------------|
| To:   | Jo-Anne Burns, West Covina<br>Planning Manager<br><a href="mailto:Jburns@westcovina.org">Jburns@westcovina.org</a>                                                          | Pages: | 2<br>Pages                  |
| From: | Jana Robbins, PTP, RSP<br><a href="mailto:jana.robbs@transtech.org">jana.robbs@transtech.org</a> ;<br>T: 909-595-8599, 133                                                  | Job #: | TT 221026                   |
| Re:   | Preliminary Traffic Scoping for the<br>Development of the Walnut Creek<br>Housing Project with 51 MFDU Located at<br>660 Walnut Creek Parkway in the City of<br>West Covina | Cc:    | Ahmad Ansari, City Engineer |

## **TRAFFIC SCOPING**

In June 2020 the City adopted the use of VMT Analysis Methodology for projects when evaluating Traffic Impacts for CEQA analysis to be in line with State Mandates. CEQA Guidelines identified that all lead agencies must use VMT as the new transportation metric for identifying impacts for land use projects beginning July 1, 2020. While CEQA requirements have changed and LOS no longer constitutes CEQA impacts, the City elected to still use LOS for planning and analysis purposes.

There are three types of screening that may be applied to effectively screen projects from a detailed, project-level VMT assessment; located in a Transit Priority corridor, Screening by Type and if located in a LOW VMT location. If a project meets one of these screening tools the project will only need to include justification that this project can be screened out and can be considered as local serving.

VMT Screening – It has been determined that **this project is located within a Transit Priority Location (TPA) and is exempt from a full VMT analysis.** Glendora Avenue is considered as a TPA route with the Walnut Creek complex within ½ mile of this route.

The analyst should confirm with all local transit providers that no recent changes in transit service have occurred in the project area (e.g. addition or removal of transit lines, addition or removal of transit stops, or changes to service frequency). The City of West Covina's TPA Map is attached.

A map or diagram should be included in the focused analysis showing the location of bus stops and the bus lines that frequent the TPA area providing justification for the project to be screened as located in a TPA area. A TPA screening assumption may not be appropriate if the project has any of the following:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers or employees of the project than required by the City;
- Is inconsistent with the applicable Sustainable Communities Strategy or

- Replaces affordable housing units with a smaller number of moderate or high income units.

After completing a preliminary Trip Generation calculation, this project is projected to generate less than 50 AM or PM peak hour trips so following the City of West Covina's Traffic Study Guidelines this project is exempt from the preparation of a full Traffic Impact Analysis. However, the project needs to prepare a Trip Generation and Access Memo outlining how the project meets criteria to be exempt from VMT as well as includes a brief discussion on Trip Generation, Parking and Access. The Memo will need to be submitted and approved by Traffic and Engineering.

The Memo should include the following:

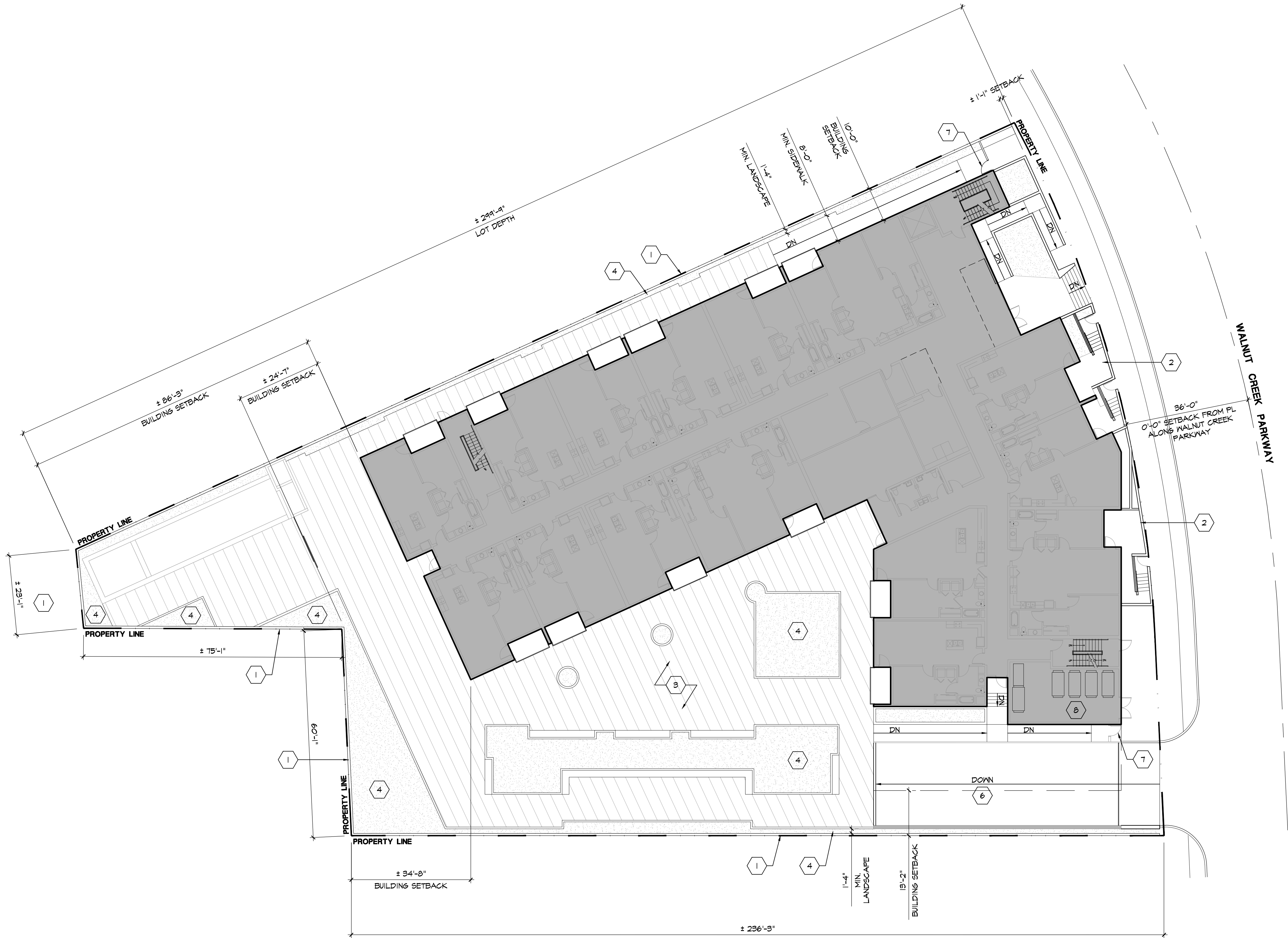
1. Estimation of the expected New Project Trips that will be generated at the site. If the site exceeds 51 units or any change in land use occurs then the scoping will need to be revisited by staff. Use the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition*, for calculating project trips.
2. General description of the use and proposed internal and external circulation.
3. A brief discussion on overflow parking for guest parking and units that have more than one vehicle and where it is assumed they will park. Aisle widths and parking stall widths all need to be shown on the site plan.
4. Since the garage entrance to the site will be gated, dimensions of the gate set-back needs to be shown on the site plan. At least one car should be able to queue on-site in front of the gate to wait while the gate opens. Vehicles will not be allowed to block the sidewalk or extend into the street to wait for the gate to open.
5. The site plan should also show existing striping on Walnut Creek Parkway and how the proposed projects driveway aligns with that of The Lakes parking garage driveway.
6. Determination that the line of sight at the Walnut Creek Parkway driveway has a clear corner sight distance to determine if any vegetation removal is needed to aid in sight distance for vehicles entering and exiting the project. (applicant's engineer will need to determine the appropriate clearance needed to meet AASHTO line of sight requirements). Currently there is no on-street parking on Walnut Creek Parkway due to insufficient roadway width and is unlikely on-street parking will be allowed.
7. The site plan should also indicate where the trash receptacle will be placed and how trash trucks will be able to access the bin.
8. Construction Impacts – general discussion on the duration, type of work, type of vehicles, how construction vehicles will enter the site, staging areas etc., how construction will minimize impacts to the adjacent neighborhood.
9. The Memo will need to be signed and stamped by a registered engineer.

*658 Walnut Creek Parkway*  
*Residential Project*  
**Proposed Project Site Plan**

**Attachment**







## CODE SUMMARY

| PROPERTY DATA       |                                              |
|---------------------|----------------------------------------------|
| PARCEL AIN:         | 8474-009-009                                 |
| ZONE:               | GENERAL URBAN ZONE                           |
| ZONE OVERLAY:       | DOWNTOWN PLAN OVERLAY ZONE                   |
| GENERAL PLAN:       | NEIGHBORHOOD - HIGH DENSITY RESIDENTIAL (NH) |
| LOT SIZE:           | 42,672 SF (.98 ACRES)                        |
| LANDSCAPE COVERAGE: | 5,194 SF (12% OF LOT)                        |

## FLOOR AREA RATIO

| FLOOR                  | AREA                            |
|------------------------|---------------------------------|
| SUBTERRANEAN PARKING   | 35,493 SF                       |
| FIRST FLOOR            | 18,715 SF                       |
| SECOND FLOOR           | 20,115 SF                       |
| THIRD FLOOR            | 20,115 SF                       |
| TOTAL FLOOR AREA       | 94,498 SF                       |
| ABOVE GRADE FLOOR AREA | 59,005 SF                       |
| FAR                    | 59,005 SF / 42,672 SF<br>= 1.38 |

## UNIT COUNT

| FLOOR        | # UNITS                          |
|--------------|----------------------------------|
| FIRST FLOOR  | (12) 1-BR / (3) 2-BR             |
| SECOND FLOOR | (16) 1-BR / (3) 2-BR             |
| THIRD FLOOR  | (16) 1-BR / (3) 2-BR             |
| TOTAL        | 53 UNITS<br>(44) 1-BR / (9) 2-BR |

## PARKING CALCULATIONS

| REQUIRED |                                               |
|----------|-----------------------------------------------|
| 1-BR     | 1.5 STALLS/UNIT<br>44 UNITS = 66 STALLS REQ'D |
| 2-BR     | 2 STALLS/UNIT<br>9 UNITS = 18 STALLS REQ'D    |
| TOTAL    | = 84 STALLS REQ'D                             |
| PROVIDED |                                               |
| TOTAL    | 84 STALLS<br>(4 ACCESSIBLE)<br>(1 VAN)        |

## CODED NOTES

|   |                                                                                                                                        |
|---|----------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 4'-0" HIGH WHITE PLASTER FINISHED CMU WALL TO WRAP EXTENTS OF ENTIRE SIDE AND REAR PROPERTY LINES - WALL TO HAVE 0'-0" SETBACK FROM PL |
| 2 | TERRACED LANDSCAPE DESIGN FEATURE AND PRIVATE UNIT BALCONIES ALONG WALNUT CREEK PARKWAY                                                |
| 3 | INTERIOR BUILDING COURTYARD/PLAZA                                                                                                      |
| 4 | LANDSCAPE FEATURES                                                                                                                     |
| 5 | POOL & AMENITIES SPACE                                                                                                                 |
| 6 | VEHICULAR RAMP TO SUBTERRANEAN PARKING                                                                                                 |
| 7 | EGRESS EXIT DOORS                                                                                                                      |
| 8 | TRASH ENCLOSURE ROOM                                                                                                                   |

## FLOOR PLAN LEGEND

|  |                             |
|--|-----------------------------|
|  | BUILDING AREA               |
|  | VEGETATIVE LANDSCAPING      |
|  | DECORATIVE HARDSCAPE FINISH |



*658 Walnut Creek Parkway*  
*Residential Project*  
**Proposed Project Parking Level Plan**

**Attachment**



Job: Plans-Metric-AIA - STANDARDS-CAD - STANDARDS-TEMPLATE-Master - Template.dwg  
Drawn By: C.E. Morris



**SUBTERRANEAN PARKING LEVEL PLAN**  
SCALE: 1/16" = 1'-0"

**FLOOR PLAN GENERAL NOTES**

- A. WHERE INFORMATION IS UNCLEAR OR A CONFLICT IS FOUND, GC IS RESPONSIBLE FOR CONTACTING THE ARCHITECT PRIOR TO PROCEEDING WITH WORK.
- B. GC SHALL VERIFY DIMENSIONS AND EXISTING UTILITIES IN FIELD AND NOTIFY ARCHITECT OF ANY DISCREPANCIES.
- C. REFER TO MECHANICAL, ELECTRICAL & PLUMBING DRAWINGS FOR ADDITIONAL INFORMATION.

**PARKING CALCULATIONS**

| REQUIRED |                                               |
|----------|-----------------------------------------------|
| 1-BR     | 1.5 STALLS/UNIT<br>44 UNITS = 66 STALLS REQ'D |
| 2-BR     | 2 STALLS/UNIT<br>9 UNITS = 18 STALLS REQ'D    |
| TOTAL    | = 84 STALLS REQ'D                             |
| PROVIDED |                                               |
| TOTAL    | 84 STALLS<br>(4 ACCESSIBLE)<br>(1 VAN)        |

**CODED NOTES**

|   |                                                    |
|---|----------------------------------------------------|
| 1 | FIRE-RATED EGRESS STAIRWELL                        |
| 2 | STAIRWELL                                          |
| 3 | ELEVATOR                                           |
| 4 | UTILITY ROOM                                       |
| 5 | ALL PARKING STALLS ARE MIN. 9'-0" x 18'-0". U.N.O. |

Design and construction documents are instruments of service and are given in confidence and remain the property of Onyx Creative. The use of this design and these construction documents for purposes other than the specific project named herein is strictly prohibited without expressed written consent of Onyx Creative.

.VAC\_Stamp & Signature.jpg

|             |             |
|-------------|-------------|
| Project No: | 2077        |
| Drawn By:   | JBN         |
| Date        | Issue       |
| 03-08-23    | PLAN UPDATE |

*658 Walnut Creek Parkway  
Residential Project*  
**Excerpts from Caltrans Highway Design  
Manual**

➤ Pages from Sections 200 and 400 – Urban Driveways





### Figure 205.1

## Access Openings on Expressways

**RECESSED OPENING**

## 205.3 Urban Driveways

These instructions apply to the design of driveways to serve property abutting on State highways in cities or where urban type development is encountered.

Details for driveway construction are shown on the Standard Plans. Corner sight distance requirements are not applied to urban driveways. See Index 405.1(2) for further information.

- (1) *Correlation with Local Standards.* Where there is a local requirement regulating driveway construction, the higher standard will normally govern.
- (2) *Driveway Width.* The width of driveways for both residential and commercial usage is measured at the throat, exclusive of any flares. ("W" as shown in Standard Plan A87A).
- (3) *Residential Driveways.* The width of single residential driveways should be 12 feet minimum and 20 feet maximum. The width of a double residential driveway such as used for multiple dwellings should be 20 feet minimum and 30 feet maximum. The width selected should be based on an analysis of the anticipated volume, type and speed of traffic, location of buildings and garages, width of street, etc.
- (4) *Commercial Driveways.* Commercial driveways should be limited to the following maximum widths:
  - (a) When the driveway is used for one-way traffic, the maximum width should be 25 feet. If the driveway serves a large parcel, where large volumes of vehicles or large vehicles are expected, the entrance maximum width should be 40 feet and the exit maximum width should be 35 feet.
  - (b) When the driveway is used for two-way traffic, the maximum width should be 35 feet. If the driveway serves a large parcel, where large volumes of vehicles or large vehicles are expected, then the maximum width should be 45 feet.
  - (c) When only one driveway serves a given property, in no case should the width of the driveway including the side slope distances exceed the property frontage.
  - (d) When more than one driveway is to serve a given property, the total width of all driveways should not exceed 70 percent of the frontage where such a frontage is 100 feet or less. Where the frontage is more than 100 feet, the total driveway width

- should not exceed 60 percent of the frontage. In either case, the width of the individual driveway should not exceed those given in the preceding paragraphs. Where more than one driveway is necessary to serve any one property, not less than 20 feet of full height curb should be provided between driveways. This distance between driveways also applies to projects where curbs and gutters are not to be placed.
- (e) Certain urban commercial driveways may need to accommodate the maximum legal vehicle. The width will be determined by the use of truck turn templates.
- (5) *Surfacing.* Where curbs, gutters, and sidewalks are to be placed, driveways should be constructed of portland cement concrete. Where only curbs and gutters are to be placed and pedestrian traffic or adjacent improvements do not warrant concrete driveway construction, the driveway may be paved with the same materials used for existing surfacing on the property to be served.
- (6) *Pedestrian Access.* Where sidewalks traverse driveways, the sidewalk shall continue across the driveway to alert driveway users that they are crossing a pedestrian walkway, and must yield to pedestrians on the sidewalk. Driveway corner radii should also be minimized to encourage low-speed turns by motorized vehicles and bicycles. For accessibility requirements, see DIB 82. Provision of this feature, as indicated in the Standard Plans, may require the acquisition of a construction easement or additional right of way. Assessment of these needs must be performed early enough in the design to allow time for acquiring any necessary permits or right of way. Additionally, designers should consider the following:
- In many cases providing the pathway along the back of the driveway will lower the elevation at the back of the sidewalk. Depending on grades behind the sidewalk the potential may exist for roadway generated runoff to enter private property. The need for features such as low berms within the construction easement, or installation of catch basins upstream of the driveway should be determined.

When there are no sidewalks or other pedestrian facilities that follow the highway, the designer may develop driveway details that eliminate the flatter portion along the back edge in lieu of using the Standard Plans for driveways. Refer to Topic 105 for additional information related to pedestrian facilities.

## 205.4 Driveways on Frontage Roads and in Rural Areas

On frontage roads and in rural areas where the maximum legal vehicle must be accommodated, standard truck-turn templates should be used to determine driveway widths where the curb or edge of traveled way is so close to the right of way line that a usable connection cannot be provided within the standard limits.

Where county or city regulations differ from the State's, it may be desirable to follow their regulations, particularly where jurisdiction of the frontage road will ultimately be in their hands.

For corner sight distance, see Index 405.1(2)(c).

Driveways connecting to State highways shall be paved a minimum of 20 feet from the edge of shoulder or to the edge of State right of way, whichever is less to minimize or eliminate gravel from being scattered on the highway and to provide a paved surface for vehicles and bicycles to accelerate and merge. Where larger design vehicles are using the driveway (e.g., dump trucks, flat bed trucks, moving vans, etc.), extend paving so the drive wheels will be on

July 1, 2020

- (5) *Lock To Lock Time* - The time in seconds that an average driver would take under normal driving conditions to turn the steering wheel of a vehicle from the lock position on one side to the lock position on the other side. The default in AutoTurn software is 6 seconds.
- (6) *Steering Lock Angle* - The maximum angle that the steering wheels can be turned. It is further defined as the average of the maximum angles made by the left and right steering wheels with the longitudinal axis of the vehicle.
- (7) *Articulating Angle* - The maximum angle between the tractor and semitrailer.

## Topic 405 – Intersection Design Standards

### 405.1 Sight Distance

(1) *Stopping Sight Distance.* See Index 201.1 for minimum stopping sight distance requirements.

(2) *Corner Sight Distance.*

- (a) General. At unsignalized intersections a substantially clear line of sight should be maintained between the driver of a vehicle, bicyclist or pedestrian stopped on the minor road and the driver of an approaching vehicle on the major road that has no stop. Line of sight for all users should be included in right of way, in order to preserve sight lines.

See DIB 79 for 2R, 3R, certain storm damage, protective betterment, operational, and safety projects on two-lane and three-lane conventional highways.

Adequate time should be provided for the stopped vehicle on the minor road to either cross all lanes of through traffic, cross the near lanes and turn left, or turn right, without requiring through traffic to radically alter their speed. The visibility required for these maneuvers form a clear sight triangle with the corner sight distance  $b$  and the crossing distance  $a_1$  or  $a_2$  (see Figure 405.1 as an example of corner sight distance at a two-lane, two-way highway). Dimensions  $a_1$  and  $a_2$  are measured from the decision point to the center of the lane. The actual number of lanes will vary on the major and minor roads. There should be no sight obstruction within the clear sight triangle.

The methodology used for the driver on the minor road that is stopped to complete the necessary maneuver while the approaching vehicle travels at the design speed of the major road is based on gap-acceptance behavior. A 7-1/2 second criterion is applied to a passenger car (including pickup trucks) for a left turn from a stop on the minor road. However, this time gap does not account for a single-unit truck (no semitrailer), a combination truck (see Index 404.4 for truck tractor-semitrailer guidance), a right-turn from a stop, or for a crossing maneuver. See Table 405.1A for the time gap that addresses these situations for the assumed design vehicle making these maneuvers from the minor road.

In determining corner sight distance, a set back distance for the vehicle waiting on the minor road must be assumed as measured from the edge of traveled way of the major road. Set back for the driver of the vehicle on the minor road should be a minimum of 10 feet plus the shoulder width of the major road but not less than 15 feet. The location of the driver's eye for the set back is the decision point per Figure 405.1. Corner sight distance and the driver's eye set back are also illustrated in Figures 405.7 and 504.3I. Line of sight for corner sight distance for passenger cars is to be determined from a 3 and 1/2-foot height at the location of the driver of the vehicle in the center of the minor road lane to a 3 and 1/2-foot object height in the center of the approaching outside lane of the major road. This provides for reciprocal sight by both vehicles. The passenger

car driver's eye height should be applied to all minor roads. In addition, a truck driver's eye height of 7.6 feet should be applied to the minor road where applicable. Additionally, if the major road has a median barrier, a 2-foot object height should be used to determine the median barrier set back. A median that is wide enough to accommodate a stopped vehicle should also provide a clear sight triangle.

The minimum corner sight distance (feet) should be determined by the equation:  $1.47V_mT_a$ , where  $V_m$  is the design speed (mph) of the major road and  $T_a$  is the time gap (seconds) for the minor road vehicle to enter the major road. The values given in Table 405.1A should be used to determine  $T_a$  based on the design vehicle, the type of maneuver, and whether the stopped vehicle's rear wheels are on an upgrade exceeding 3 percent. The distance from the edge of traveled way to the rear wheels at the minor road stop location should be assumed as: 20 feet for a passenger car, 30 feet for a single-unit truck, and 72 feet for a combination truck.

- (b) Public Road Intersections (Refer to Topic 205 and Index 405.7); corner sight distance applies, see Table 405.1A.

At signalized intersections the corner sight distances should also be applied whenever possible. Even though traffic flows are designed to move at separate times, unanticipated conflicts can occur due to violation of signal, right turns on red, malfunction of the signal, or use of flashing red/yellow mode.

The minimum value for corner sight distance at signalized intersections should be equal to the stopping sight distance as given in Table 201.1, measured as previously described. This includes an urban driveway that forms a leg of the signalized intersection.

- (c) Private Road Intersections (Refer to Index 205.2) and Rural Driveways (Refer to Index 205.4); corner sight distance applies, see Table 405.1A. If signalized, the minimum corner sight distance should be equal to the stopping sight distance as given in Table 201.1, measured as previously described.
- (d) Urban Driveways (Refer to Index 205.3); corner sight distance requirements as described above are not applied to urban driveways unless signalized. See Index 405.1(2)(b) underlined standard. If parking is allowed on the major road, parking should be prohibited on both sides of the driveway per the California MUTCD, 3B.19.
- (3) Decision Sight Distance. At intersections where the State route turns or crosses another State route, the decision sight distance values given in Table 201.7 should be used. In computing and measuring decision sight distance, the 3.5-foot eye height and the 0.5-foot object height should be used, the object being located on the side of the intersection nearest the approaching driver.

The application of the various sight distance requirements for the different types of intersections is summarized in Table 405.1B

July 1, 2020

**Table 201.1****Sight Distance Standards**

| Design Speed <sup>(1)</sup><br>(mph) | Stopping <sup>(2)</sup><br>(ft) | Passing<br>(ft) |
|--------------------------------------|---------------------------------|-----------------|
| 10                                   | 50                              | ---             |
| 15                                   | 100                             | ---             |
| 20                                   | 125                             | 800             |
| 25                                   | 150                             | 950             |
| 30                                   | 200                             | 1,100           |
| 35                                   | 250                             | 1,300           |
| 40                                   | 300                             | 1,500           |
| 45                                   | 360                             | 1,650           |
| 50                                   | 430                             | 1,800           |
| 55                                   | 500                             | 1,950           |
| 60                                   | 580                             | 2,100           |
| 65                                   | 660                             | 2,300           |
| 70                                   | 750                             | 2,500           |
| 75                                   | 840                             | 2,600           |
| 80                                   | 930                             | 2,700           |

Notes:

<sup>(1)</sup>See Topic 101 for selection of design speed.<sup>(2)</sup>For sustained downgrades, refer to underlined standard in Index 201.3

The sight distance available for passing at any place is the longest distance at which a driver whose eyes are 3 ½ feet above the pavement surface can see the top of an object 4 ¼ feet high on the road. See Table 201.1 for the calculated values that are associated with various design speeds.

In general, 2-lane highways should be designed to provide for passing where possible, especially those routes with high volumes of trucks or recreational vehicles. Passing should be done on tangent horizontal alignments with constant grades or a slight sag vertical curve. Not only are drivers reluctant to pass on a long crest vertical curve, but it is impracticable to design crest vertical curves to provide for passing sight distance because of high cost where crest cuts are involved. Passing sight distance for crest vertical curves is 7 to 17 times longer than the stopping sight distance.

Ordinarily, passing sight distance is provided at locations where combinations of alignment and profile do not require the use of crest vertical curves.