



INITIAL STUDY

CITY OF COVINA HOUSING ELEMENT UPDATE



Lead Agency:

**City of Covina
Community Development Department
Planning Division
125 East College Street
Covina, California 91723**

October 2008

(Revised September 2010)



Table of Contents

Section	Page
1.0 INTRODUCTION.....	3
1.1 Purpose of this Initial Study.....	3
1.2 Organization of the Initial Study.....	3
2.0 PROJECT DESCRIPTION	11
2.1 Project Location	11
2.2 Environmental Setting.....	11
2.3 Project Description	15
3.0 ENVIRONMENTAL ANALYSIS.....	16
3.1 Land Use and Development Impacts	16
3.2 Population and Housing Impacts	20
3.3 Earth and Geology Impacts.....	21
3.4 Hydrology and Water Impacts	23
3.5 Air Quality Impacts	25
3.6 Biological Resources Impacts.....	27
3.7 Mineral Resources Impacts.....	29
3.8 Risk of Upset Impacts	30
3.9 Noise Impacts.....	32
3.10 Public Services Impacts.....	34
3.11 Utilities Impacts	36
3.12 Aesthetic Impacts	38
3.13 Cultural Resources Impacts	39
3.14 Recreation Impacts	40
3.15 Transportation and Circulation Impacts	41
4.0 FINDINGS.....	44
5.0 REFERENCES	45
5.1 Prepares.....	45
5.2 References	45





SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

This Initial Study evaluates the environmental impacts of the City of Covina Housing Element. The State of California requires that all local governments (both cities and counties) prepare and maintain housing elements to identify strategies to conserve, rehabilitate, and provide housing to meet the existing and projected needs of the community. The City of Covina Housing Element fulfills the requirements of the State of California Planning and Zoning Laws and the regulations of Sections 65580 through 65589.5 of the California Government Code. The draft Housing Element is considered to be a *project* pursuant to the California Environmental Quality Act (CEQA).

As part of the review of the draft Housing Element, the City of Covina has authorized the preparation of this Initial Study, the primary purpose of which is to ensure that decision-makers and the public understand the environmental implications of the Element prior to its approval. Other uses of this Initial Study include the following:

- To provide the City with information to use as the basis for deciding whether to prepare an environmental impact report (EIR) for the draft Housing Element;
- To facilitate environmental assessment and review in the early stages of the draft Housing Element's preparation; and,
- To provide documentation in support of findings that a particular environmental issue will not be significantly affected by the draft Element's implementation.

1.2 ORGANIZATION OF THE INITIAL STUDY

The format and structure of this Initial Study generally reflects that of the initial study checklist, provided on the pages that follow. The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction*, provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description*, provides an overview of the City of Covina and summarizes the draft Housing Element.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the adoption and subsequent implementation of the draft Housing Element.
- *Section 4 Findings* indicates how the draft Housing Element might yield, or have the potential to yield, a significant effect upon one or more of the issue areas analyzed in this Initial Study.
- *Section 5 References*, identifies the sources used in the preparation of this Initial Study.

The findings of this Initial Study are summarized in Table 1 provided on the following pages.



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
3.1 LAND USE AND DEVELOPMENT. <i>Would the project:</i>				
a) Physically divide an established community, or otherwise result in an incompatible land use?				X
b) Conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
d) 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?				X
e) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
f) Involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use?				X
3.2 POPULATION AND HOUSING. <i>Would the project:</i>				
a) Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X
3.3 EARTH RESOURCES AND GEOLOGY. <i>Would the project result in or expose people to potential impacts involving:</i>				
a) The risk of loss 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 rupture?				X
b) Substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction?				X
c) Substantial soil erosion or the loss of topsoil?				X



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
d) Location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✗
e) Location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				✗
f) Soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✗
g) Unique geologic or physical features?				✗
3.4 WATER AND HYDROLOGY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?				✗
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge in such a way that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				✗
c) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site?				✗
d) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in flooding on or off-site?				✗
e) Create or contribute run-off water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted run-off?				✗
f) Substantially degrade water quality?				✗
g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?				✗
h) Place within a 100-year flood hazard area, structures which would impede or redirect flood flows?				✗
i) Expose people or structures to a significant risk of flooding as a result of dam or levee failure?				✗
j) Result in inundation by seiche, tsunami, or mudflow?				✗
3.5 AIR QUALITY. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				✗



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				✗
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			✗	
d) Expose sensitive receptors to substantial pollutant concentrations?				✗
e) Create objectionable odors affecting a substantial number of people?				✗
f) Alter air movement, moisture, or temperature, or cause any change in climate?				✗
3.6 BIOLOGICAL RESOURCES. Would the project have a substantial adverse effect:				
a) 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?				✗
b) 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 U.S. Fish and Wildlife Service?				✗
c) 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?				✗
d) In interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✗
e) In conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✗
f) By conflicting with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✗
3.7 ENERGY AND MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✗
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✗



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
c) Conflict with adopted energy conservation plans?				✗
d) Use non-renewable resources in a wasteful and inefficient manner?				✗
3.8 RISK OF UPSET AND HUMAN HEALTH. <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?				✗
b) Create a significant hazard to the public or the environment or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				✗
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✗
d) Be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?				✗
e) Within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?				✗
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency response plan or emergency evacuation plan?				✗
g) Expose people or structures to a significant risk of loss, injury, or death involving wild land fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?				✗
3.9 NOISE. <i>Would the project result in:</i>				
a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				✗
b) Exposure of people to, or generation of, excessive ground-borne noise levels?				✗
c) Substantial permanent increase in ambient noise levels in the project vicinity above noise levels existing without the project?				✗
d) Substantial temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project?				✗
e) For a project located with 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?				✗



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X
3.10 PUBLIC SERVICES. <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives in any of the following areas:</i>				
a) Fire protection services?			X	
b) Police protection services?			X	
c) School services?				X
d) Library facilities?			X	
e) Other governmental services?			X	
3.11 UTILITIES. <i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			X	
h) Result in a need for new systems, or substantial alterations in power or natural gas facilities?			X	
i) Result in a need for new systems, or substantial alterations in communication systems?			X	



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
3.12 AESTHETICS. <i>Would the project:</i>				
a) Affect a scenic vista?				X
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				X
3.13 CULTURAL RESOURCES. <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the CEQA Guidelines?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?				X
c) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?				X
d) Disturb any human remains, including those interred outside of formal cemeteries?				X
e) Have the potential to cause a physical change that would affect unique ethnic cultural values?				X
f) Restrict existing religious or sacred uses within the potential impact area?				X
3.14 RECREATION. <i>Would the project:</i>				
a) 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?			X	
b) Affect existing recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
3.15 TRANSPORTATION AND CIRCULATION. <i>Would the project:</i>				
a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	
b) Exceed, either individually or cumulatively, a level of service standard established by the County Congestion Management agency for designated roads or highways?			X	



**Table 1
Summary (Initial Study Checklist)**

Environmental Issues Area Examined	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to the design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✗
d) Result in inadequate emergency access?				✗
e) Result in inadequate parking capacity?				✗
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				✗
g) Result in waterborne or air traffic impacts?				✗
h) Result in hazards or barriers for pedestrians or bicyclists?				✗





SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION & SETTING

The proposed “project” involves the approval and subsequent implementation of the City of Covina Housing Element. The City of Covina is located in the easterly portion of the San Gabriel Valley approximately twenty-three miles east of downtown Los Angeles. The City is bounded by a number of other incorporated cities that include West Covina on the south, Baldwin Park on the west, Azusa and Glendora on the north, and San Dimas on the east. In addition, numerous unincorporated Los Angeles County areas are found adjacent to the City and within Covina’s designated sphere of influence. A regional location map is provided in Exhibit 1. A vicinity map of the City is provided in Exhibit 2.

2.2 PROJECT DESCRIPTION

The State of California requires that all local governments (both cities and counties) prepare and maintain housing elements to identify strategies to conserve, rehabilitate, and provide housing to meet the existing and projected needs of the community. Specific requirements concerning the scope and content of housing elements have been established by the State Legislature. The Legislature, in turn, has delegated the responsibility of implementing its directives to the California Department of Housing and Community Development (HCD). The HCD is responsible for ensuring that State housing law is being implemented at the local level. To monitor compliance with these requirements and the State’s overall housing policies, all housing elements must also be reviewed by HCD prior to, and following, their adoption.

The policies and implementing programs contained in the draft Housing Element will serve as the City’s blueprint in defining how the existing housing stock in Covina is to be maintained and conserved while facilitating new residential development in accordance with State law. The focus of the draft Housing Element is to establish a comprehensive and long-range planning strategy that specifically addresses housing need. The Element consists of the following three components:

- The *Introduction* provides an overview of the Housing Element and describes the statutory authority related to its implementation.
- The *Profile Report* describes the demographic, housing, socioeconomic, and employment characteristics of Covina.
- The *Housing Plan* indicates citywide policies and programs that will conserve and maintain existing housing in Covina in addition to promoting the development of new housing.

The authority to determine housing needs for the various income groups for cities within the Southern California region has been delegated to the Southern California Association of Governments (SCAG), pursuant to Section 65584 of the Government Code. The SCAG prepared a Regional Housing Needs Assessment (RHNA) that is applicable to all Southern California Cities, including Covina. The RHNA housing needs are categorized according to the following income groups:

- *The Extremely Low Income* households are those whose income does not exceed 30% of the median household income for the greater Los Angeles area;



- The *Very Low Income* households are those whose income does not exceed 50% of the median household income for the greater Los Angeles area;
- The *Low Income* households earn from 51% to 80% of the median;
- The *Moderate Income* groups earn from 81% to 120% of the median; and,
- The *Above Moderate* households earn over 120% of the median income.

SCAG's RHNA estimated the seven-year future housing construction need for Covina at 1,337 units (refer to Table 2). In other words, during this planning period, beginning in 2006 and continuing into 2014, a total of 1,337 units were identified as being required to meet Covina's RHNA units. During this same planning period, a total of 346 units were actually provided (planned for, entitled, or constructed) leaving an unmet need of 991 units.

Table 2
RHNA for the City of Covina 2006-2014

Number of Units	Number (%)
Extremely Low Income Household	168 (12.6%)
Very Low Income Households	168 (12.61%)
Low Income Households	211 (15.8%)
Moderate Income Households	226 (16.9%)
Above Moderate Income Households	564 (42.2%)
Total Need-Future Housing	1,337 (100.0%)

Source: Southern California Association of Governments

The draft Housing Element outlines the following strategies as a means to accommodate its assigned housing need:

- *Strategy #1* – The City will continue to implement General Plan land use policy for the areas designated for residential land uses. Under this strategy, the City will promote the development of underutilized parcels designated for higher density.
- *Strategy #2* – The City will continue to implement the Town Center Specific Plan.
- *Strategy #3* – The City will promote the use of density bonuses for affordable housing.
- *Strategy #4* – The City will continue to implement the provisions of the City's second unit ordinance.

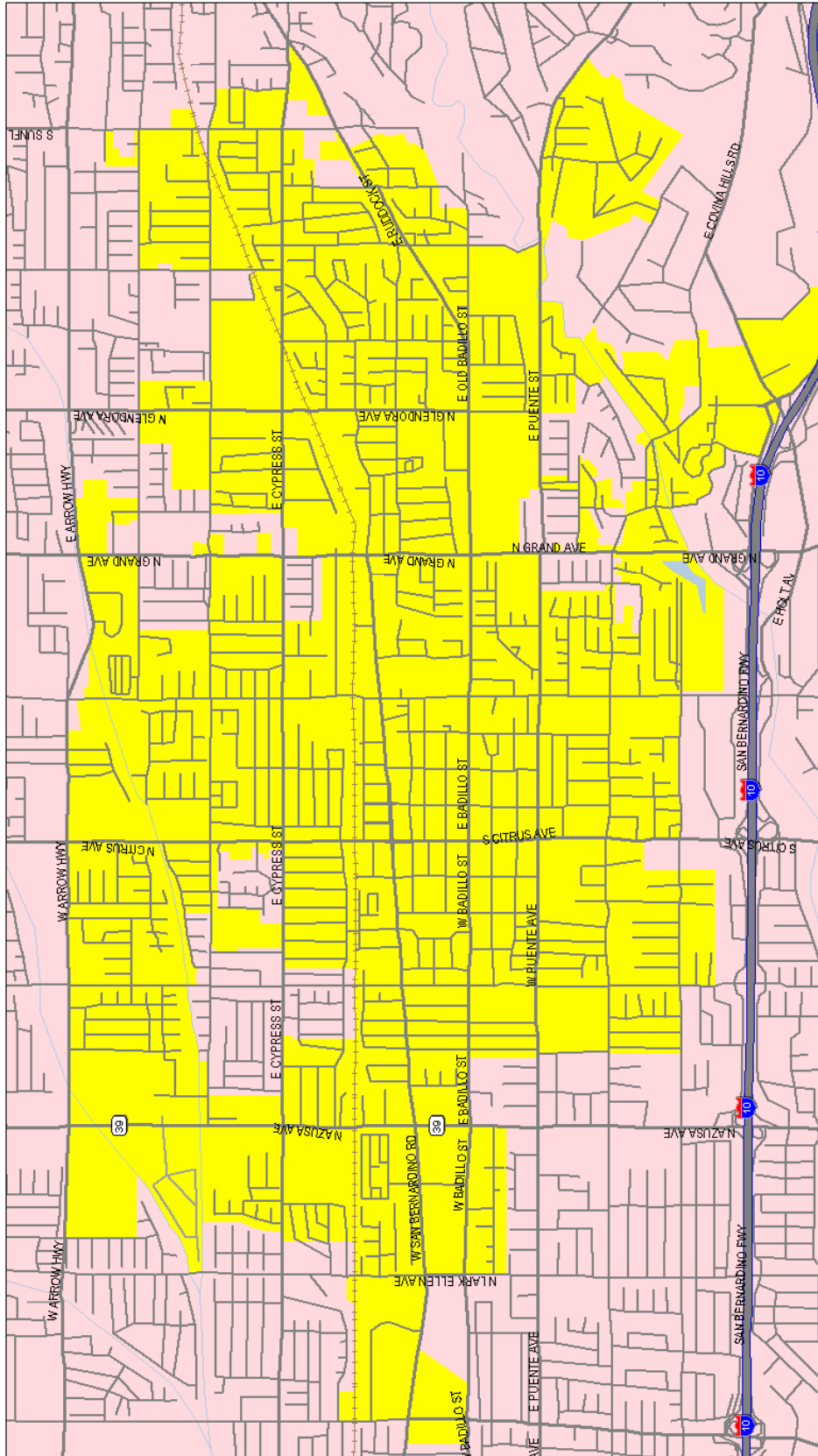


EXHIBIT 2
MAP OF THE CITY OF COVINA
Source: City of Covina



As indicated previously, the planning period governed by the RHNA extends from 2006 to 2014 and the City may receive credit towards the RHNA for the new housing that has been entitled, under construction, or built during the past two years. When considering the development that have been approved or constructed during the past two years, a total of 346 units have been provided leaving a remaining housing need of 991 units. As indicated in Table 3, the City's remaining unmet need for the planning period is 991 units. There is a remaining unmet need for above moderate income units (220 units are still needed), moderate income units (226 units are still needed), low income units (210 units are still needed), very low income units (167 units are still needed), and extremely low income units (168 units are still needed).

**Table 3
Housing Accomplishments**

Income category	# Units	Total Provided	Unmet Need
Extremely Low	168	0	168
Very Low	168	1	167
Low	211	1	210
Moderate	226	0	226
Above Moderate	564	344	220
Total	1,337	346	991

Source: City of Covina Draft Housing Element, 2008

2.3 DISCRETIONARY ACTIONS

The following discretionary approvals will be required:

- The draft Housing Element will undergo public review before the Planning Commission and City Council. The Element will be incorporated into the City of Covina General Plan once it has been adopted by the City Council.
- The Housing Element is a project pursuant to CEQA. As a result, the City Council must approve the Negative Declaration as part of its deliberations.





SECTION 3. ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the adoption and subsequent implementation of the draft Housing Element described herein in Section 2. The issue areas evaluated in this Initial Study include the following:

- | | |
|---|---|
| <ul style="list-style-type: none"> ● Land Use and Development; ● Population and Housing; ● Earth and Geology; ● Water and Hydrology; ● Air Quality; ● Biological Resources; ● Energy and Mineral Resources; ● Risk of Upset and Human Health; | <ul style="list-style-type: none"> ● Noise; ● Public Services; ● Utilities; ● Aesthetics; ● Cultural Resources; ● Recreation; and, ● Transportation and Circulation. |
|---|---|

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated, and an answer is provided according to the analysis undertaken as part of the Initial Study's preparation. To each question, there are four possible responses:

- *No Impact.* The draft Housing Element will not lead to actions and/or development that will have a measurable environmental impact on the environment, and no further analysis is required.
- *Less Than Significant Impact.* The draft Housing Element may have the potential for impacting the environment, although these impacts are likely to be below levels or thresholds that the City of Covina or other responsible agencies consider to be significant.
- *Potentially Significant Impact.* The draft Housing Element may have the potential to generate effects which the City of Covina considers to represent a significant impact on the environment. However, mitigation measures that will be effective in reducing impacts to levels that are less than significant have been recommended.
- *Significant Adverse Impact.* The draft Housing Element may, or is known to, represent impacts that are considered significant, and additional analysis is required to identify mitigation measures.

The City, through the preparation of this Initial Study, determined that no significant adverse unmitigable impacts would occur as a result of the draft Housing Element adoption and subsequent implementation. This is due to the fact that the four land use strategies may be accommodated through the implementation of the existing General Plan and adopted ordinances. No General Plan Amendment(s) will be required.

3.1 LAND USE & DEVELOPMENT IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant impact on land use and development if it results in any of the following:

- The disruption or division of the physical arrangement of an established community;



- A conflict with an applicable land use plan, policy, or regulation of the agency with jurisdiction over the project
- A conflict with any applicable conservation plan or natural community conservation plan;
- The conversion of prime farmland, unique farmland, or farmland of statewide importance;
- A conflict with existing zoning for agricultural use, or a Williamson Act contract; or
- Changes to the existing environment which, due to their location or nature, may result in the conversion of farmland to non-agricultural uses.

A. Would the project physically divide an established community? No Impact.

The draft Housing Element will not result in any changes to the adopted land use policy or the existing Land Use Plan provided in the Community Development Element that would divide an established community. As indicated previously, the RHNA housing objectives developed for the City by SCAG total 1,337 housing units. According to SCAG, this number represents the total number of new units that should be added to the City's housing inventory between 2006 and 2014 to meet the existing and projected housing need for the City. The development possible in the area governed by the Town Center Specific Plan and the City of Covina General Plan exceeds the existing number of housing units by 3,127 units. As indicated previously, the RHNA calls for the City of Covina to facilitate the development of 1,337 housing units during the 2006-2014 planning period. In addition, a total of 346 units have been entitled and/or constructed during the planning period leaving a remaining unmet need for 991 units. The City will employ the following land use measures as a means to accommodate its assigned housing need.

- *Strategy #1* - Continue to implement General Plan land use policy for the areas designated for residential land uses.
- *Strategy #2* - Continue to implement the Town Center Specific Plan.
- *Strategy #3* - Promote the use of density bonuses for affordable housing.
- *Strategy #4* - Continue to implement the provisions of the City's second unit ordinance.

The City will retain the current general plan and zoning land use designations that are applicable to the residential neighborhoods as a means to accommodate the unmet RHNA of for 991 units. A total of 17,905 units are theoretically possible under full implementation of the general plan. As a result, no significant adverse impacts are anticipated.

B. Would the project conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? No Impact.

There are several existing environmental plans that are applicable to the City, including the Regional Comprehensive Plan, the Congestion Management Plan, and the Air Quality Management Plan. The applicability of these plans is discussed under their respective issue areas (air quality, traffic and circulation, etc.). As indicated previously, the current adopted land use plans (the City of Covina General Plan shown in



Exhibit 3 and the Town Center Specific Plan) will serve to promote the development of new housing as required under the RHNA. The RHNA housing need (1,337 units) represents a mandate required by the State of California as part of the RHNA's implementation. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. The draft Housing Element will not introduce any additional impacts beyond that previously anticipated under the City of Covina General Plan, the Town Center Specific Plan, or the aforementioned regional plans. As a result, no significant adverse impacts on adopted environmental plans are anticipated.

C. Will the project conflict with any applicable habitat conservation plan or natural community conservation plan? No Impact.

No natural, undeveloped areas are located within the City or in the immediate area of the potential sites for new residential development. In addition, there are no potential residential development sites that are subject to habitat conservation plans. As a result, no impacts on habitat conservation plans will occur with the adoption of the draft Housing Element and its subsequent implementation.

D. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? No Impact.

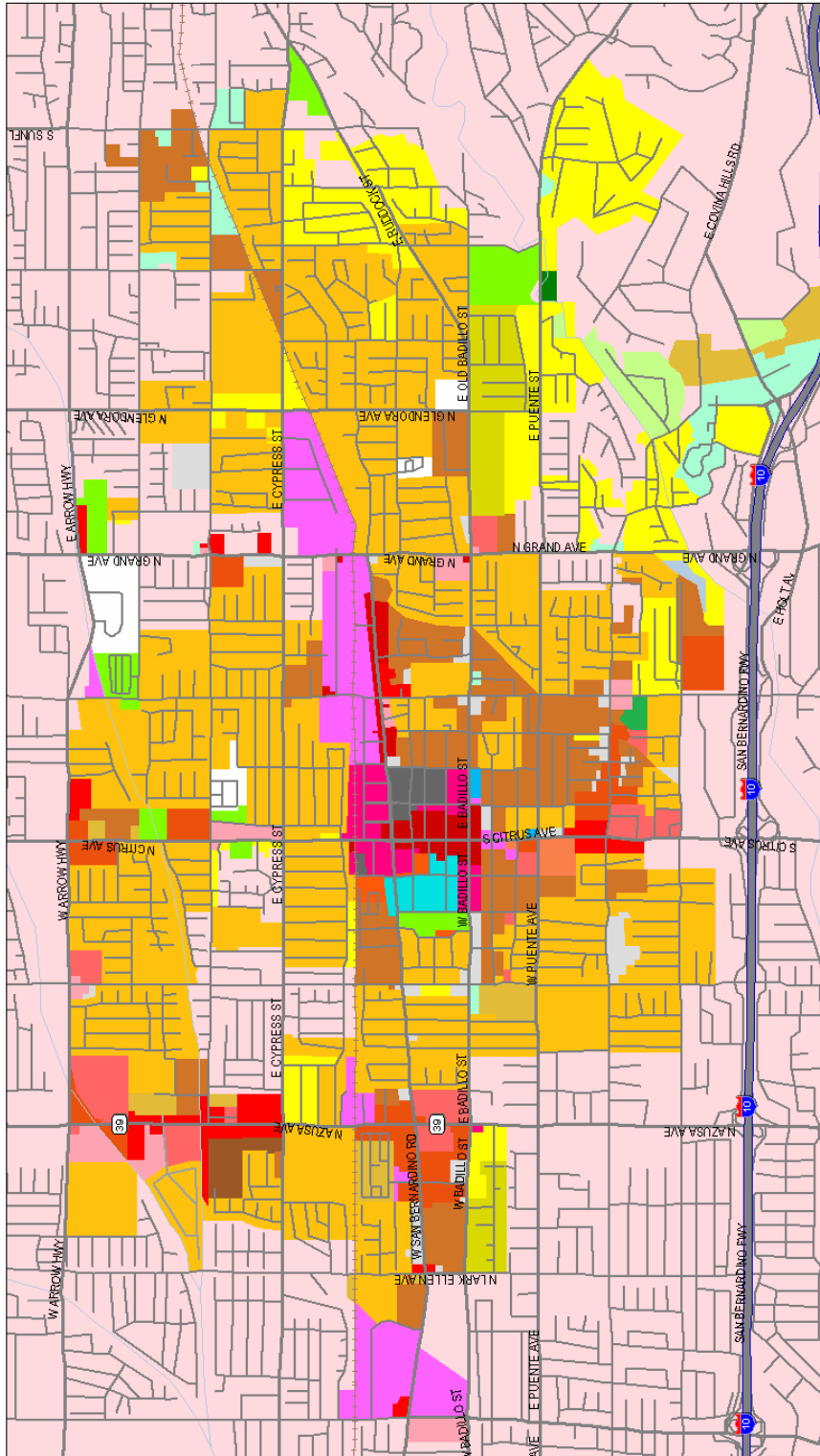
No lands within the City are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As a result, any future residential development contemplated as part of the draft Housing Element's implementation will not impact any land areas designated for agricultural production. As a result, no impacts on these soil resources will result from the draft Housing Element's adoption and subsequent implementation.

E. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? No Impact.

No parcels are located within the City that is subject to a Williamson Act contract. As a result, no impacts on existing Williamson Act contracts will result from the draft Housing Element's adoption and subsequent implementation.

F. Would the project involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use? No Impact.

No agricultural activities or farmland uses are located within the City, nor does the City of Covina General Plan contain any agricultural land use designation. The draft Housing Element's implementation will not result in the conversion of any existing farmland to urban uses, since there are no sites in the City in agricultural use. As a result, no farmland conversion impacts will result from the draft Housing Element's adoption and subsequent implementation.



Legend

- PCD - Planned Community Development
- Residential recreation
- Medical & Professional Office
- Health Services
- Single Family A-1 - 1/2 Acre Minimum
- Residential (Town Center-Specific Plan)
- Retail & Service Core
- Mixed Use
- E-2 Single Family 2 1/2 Acre minimum
- A-2 Single Family - 2 Acre Minimum
- Single Family Residential R-1-7500
- Multiple Family RD
- M-1 Light Manufacturing
- Highway Commercial
- Neighborhood Shopping Center
- Administrative & Professional Office
- Retail & Service Core
- Regional or Community Shopping center
- Trailer & Mobile Home Parks R-TP
- Single Family E-1
- Single Family Residential R-1-8500
- Neighborhood Stores
- Commercial C-3 Central Business

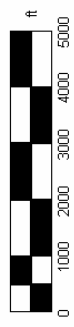


EXHIBIT 3
ZONING MAP OF THE CITY OF COVINA
 Source: City of Covina



3.2 POPULATION & HOUSING IMPACTS

According to the City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant impact on housing and population if it results in any of the following:

- A substantial growth in the population within an area, either directly or indirectly related to a project;
- The displacement of a substantial number of existing housing units, necessitating the construction of replacement housing; or
- The displacement of substantial numbers of people, necessitating the construction of replacement housing.

A. Would the project induce substantial population growth in an area, either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)? No Impact.

The California Department of Finance (DOF) estimated the City's population in January 2008 to be 49,552 persons. According to the same DOF estimates, there are 16,533 housing units located in the City. As indicated previously, the RHNA housing objectives developed for the City by SCAG total 1,337 housing units. According to SCAG, this number represents the total number of new units that should be added to the City's housing inventory between 2006 and 2014 to meet the existing and projected housing need for the City. The additional 1,337 units will translate into a projected population increase of 4,051 persons assuming an average household size of 3.03 persons per unit. Since this increase corresponds to SCAG's RHNA projections, no significant adverse impacts will result.

B. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? No Impact.

The draft Housing Element promotes the development of 1,337 new housing units. In addition, the Element contains policies and programs designed to discourage the conversion of subsidized housing to market rate units. Finally, no housing units will be displaced as part of the Housing Element's implementation. As a result, no adverse impacts related to existing or potential housing displacement will result from the draft Housing Element's adoption and subsequent implementation.

C. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? No Impact.

The draft Housing Element promotes the development of new housing (a total of 1,337 units for the period between 2006 and 2014). In addition, the Housing Element contains policies and programs designed to discourage the conversion of subsidized housing to market rate units. As a result, no significant adverse impacts related to existing or potential housing displacement will result from the draft Housing Element's adoption and subsequent implementation.



3.3 EARTH & GEOLOGY IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant adverse environmental impact on the environment if it results in the following:

- The exposure of people or structures to potential substantial adverse effects, including the risk of loss, or death related to fault rupture from a known earthquake fault;
- Substantial soil erosion resulting in the loss of topsoil;
- Locating a project within a geologic or soils unit that is unstable, or that would become unstable as a result of the project, potentially resulting in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
- Locating on an expansive soil creating substantial risks to life or property; or
- Locating a project on 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.

A. Would the project result in or expose people to potential impacts, including the risk of loss 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 rupture? No Impact.

Major faults in the region include the Whittier/Elsinore, Norwalk, Newport/Inglewood, Santa Monica, Sierra Madre, Palos Verdes, and San Andreas faults. According to the State of California Geological Survey, no known or suspected active fault traces pass through or are located near the City. There are no designated Alquist-Priolo Special Studies Zones found within the City. In recent years, researchers have identified a previously unknown blind thrust fault that extends from the Puente Hills westerly towards downtown Los Angeles. The City is, and will continue to be, subject to ground-shaking hazards associated with earthquakes in the region. The level of risk within the City is no greater than that anticipated for the region. However, there are no fault rupture hazards associated with the draft Housing Element's adoption and subsequent implementation since no active fault traces are known or suspected to traverse the City.

B. 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 or seismic-related ground failure, including liquefaction? No Impact.

The City will be subject to the effects of seismic activity from the numerous faults found within the region. The potential adverse effects from these earthquakes may be mitigated by the special building and construction standards contained within the Uniform Building Codes (Seismic Zone 4) standards. According to the United States Geological Survey, the City is not unique in terms of ground motion. The level of seismic risk is no greater than that for other areas within the Southern California region. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project expose people or structures to potential substantial adverse effects, including substantial soil erosion or the loss of topsoil? No Impact.



According to the Los Angeles County Safety Element, portions of the City are located within an area subject to a potential liquefaction hazard. More recent studies have been completed by the State of California Geological Survey (CGS) Seismic Hazard Zones Mapping Program. According to the preliminary maps completed by the CGS confirm that the urbanized areas where development is anticipated, including the area governed by the Town Center Specific Plan, are not located in areas with a high liquefaction potential. In addition, the level of impact or risk is no greater than that for other areas within the Southern California region. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project expose people or structures to potential substantial adverse effects, including location on a geologic unit or a soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? No Impact.

The topography of the City is generally level and though hillsides are found in the south easterly portion of the City. According to studies that have been completed by the State of California Geological Survey (CGS) Seismic Hazard Zones Mapping Program indicate the City is not located within an area subject to potential landslide or slope failure risk (the City's overall topography is generally level). An area located south east of the City that is part of the San Jose Hills is may be subject to slope failure. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

E. Would the project result in or expose people to potential impacts, including location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? No Impact.

The majority of the City is developed and largely covered over with impervious surfaces. The soils are not anticipated to represent a significant development constraint given the nature and extent of development found in the planning area. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

F. Would the project result in or expose people to potential impacts, including soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? No Impact.

No septic tanks are proposed as part of the implementation of the draft Housing Element. No sewer connections will be made to any future development constructed pursuant to the draft Housing Element's implementation. As a result, no impacts will result.

G. Would the project result in or expose people to potential impacts, including unique geologic or physical features? No Impact.

There are no unique land forms found in the City that would preclude future development anticipated as part of the draft Housing Element's implementation. No natural features or land forms are found in the City. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.



3.4 HYDROLOGY & WATER IMPACTS

According to City of Covina, acting as Lead Agency, a project may be deemed to have a significant adverse environmental impact on water resources or water quality if it results in any of the following:

- A violation of any water quality standards or waste discharge requirements;
- A substantial depletion of groundwater supplies or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
- A substantial alteration of the existing drainage pattern of the site or area through the alteration of the course of a stream or river in a manner which would result in substantial erosion or siltation on or off-site;
- A substantial alteration of the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in flooding on or off site;
- The creation or contribution of water runoff which would exceed the capacity of existing or planned storm water drainage systems or the generation of substantial additional sources of polluted runoff;
- The substantial degradation of water quality;
- The placement of housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- The placement of structures within a 100-year flood hazard areas which would impede or redirect flood flows; or
- The exposure of a project to inundation by seiche, tsunami, or mudflow.

A. Would the project violate any water quality standards or waste discharge requirements? No Impact.

Future water consumption will be limited to that typical of residential development, and this consumption will be related to water used for potable consumption, routine maintenance and landscaping. No industrial wastewater discharges would be associated with the uses anticipated under the draft Housing Element's implementation. The majority of the potential development sites are currently paved or covered over with impervious surfaces, which could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants being transported into the storm drains on site. Given the developed character of the potential development sites, there is likely to be an improvement in the quality of storm water runoff. Future development projects will be required to comply with the National Pollutant Elimination System Discharge (NPDES) requirements. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

B. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge in such a way that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of a pre-existing nearby well would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? No Impact.



Water supply in the City is derived from local groundwater wells operated and maintained by the water purveyors that serve the City, as well as imported water from the Metropolitan Water District (MWD). The majority of the remaining RHNA need will be provided as part of the implementation of the Town Center Specific Plan. This plan promotes higher density development in the downtown area. Other potential development sites are scattered throughout the City and the majority of the sites are will served by existing infrastructure. Once specific development sites are slated for development, the City will determine the nature and extent of the required infrastructure as part of the development review and plan check process. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? No Impact.

The majority of the potential development sites were previously developed and largely covered over with impervious surfaces, including buildings, asphalt roadways, and parking areas. Walnut Creek, the only remaining riparian area in the planning area, will not be affected. No other natural drainage features remain within the candidate development sites. As a result, no impacts on streams or natural hydrology are anticipated.

D. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in flooding on-or off site? No Impact.

There are no lakes or streams within the City. The majority of the potential development sites have undergone previous development. No natural stream channels remain within any of the candidate development sites. The future development contemplated as part of the draft Housing Element's implementation will not impact any of the aforementioned rivers. In addition, there will not be a significant increase in the quantity of storm water surface runoff conveyed to the local storm drain system, given the extent of existing impervious surfaces found within each of the proposed development sites. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

E. Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff? No Impact.

There will not be a significant change in the amount of surface runoff volumes from the planning area due to the nature and extent of the existing impervious surfaces. There are no water bodies located within those areas where future residential development is contemplated. Walnut Creek, the only remaining riparian area in the planning area, will not be affected. The nature and extent of storm water runoff ultimately discharged into the existing storm drain system will not significantly change due to the amount of existing impervious surfaces found within the area.

F. Would the project otherwise substantially degrade water quality? No Impact.

Future development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas on-site in the absence of mitigation. These pollutants may enter the storm drain system during periods of rainfall. Under Section 402 of the Clean Water Act (CWA), all point source discharges of



pollutants to waters of the United States (including lakes, rivers, wetlands, etc.) must be issued a National Pollutant Discharge Elimination System (NPDES) permit. NPDES permits issued for point sources must contain measures for ensuring any discharges meet water quality-based provisions of Section 301 of the CWA. As a result, discharges may not contain pollutants at levels which would cause the receiving water body to fail in meeting a water quality standard set by the State of California or the EPA for that water body. In addition, discharges must meet the technology-based requirements of Section 301 of the CWA. Discharges must meet an acceptable level of pollution control for that type of discharge, regardless of whether or not that level of control is specifically needed to protect the water body to which the discharge is directed. The implementation of these existing regulations and other pertinent requirements will mitigate any potential impacts. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

G. Would the project place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? No Impact.

The City of Covina is not located within a designated flood hazard area as identified by the Federal Emergency Management Agency (FEMA). As a result, the proposed action will not result in the introduction of new housing units within a designated flood plain.

H. Would the project place within a 100-year flood hazard area, structures which would impede or redirect flood flows? No Impact.

Future residential development undertaken as part of the draft Housing Element's implementation will not impede or redirect the flows of potential flood water. As a result, no significant adverse impacts will result.

I. Would the project expose people or structures to a significant risk of flooding as a result of dam or levee failure? No Impact.

The potential development sites have been previously developed and largely covered over with impervious surfaces, including buildings, asphalt roadways, and parking areas. No natural drainage features remain within the candidate development sites to surrounding development. As a result, no impacts on streams or natural hydrology are anticipated.

J. Would the project result in inundation by seiche, tsunami, or mudflow? No Impact.

There are no bodies of surface water located within the City. No other reservoirs, lakes, rivers, or streams are located within or adjacent to the project site. Additionally, the Pacific Ocean is located 28 miles to the southwest. No hillside areas are located in the vicinity of the development sites and, as a result, landslide and/or mudflows are not anticipated to represent a hazard to future development. As a result, no seiche or tsunami hazards are anticipated.

3.5 AIR QUALITY IMPACTS

According to City of Covina, acting as Lead Agency, an action or project will normally have a significant adverse environmental impact on air quality, if it results in any of the following:

- The project results in a conflict with, or obstructs the implementation of, the applicable air quality plan;



- A violation of an air quality standard or contribute substantially to an existing or projected air quality violation;
- 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;
- The exposure of sensitive receptors to substantial pollutant concentrations; or
- The creation of objectionable odors.

The South Coast Air Quality Management District (SCAQMD) has also established daily emissions thresholds for a number of criteria pollutants. These thresholds include: 550 pounds of carbon monoxide (CO), 55 pounds of nitrogen oxides (NO_x), 150 pounds of sulfur dioxide (SO_x), 55 pounds of reactive organic gases (ROG), and 150 pounds of PM¹⁰ particulates. These thresholds apply to both short-term (construction-related) emissions and long-term (operational) emissions.

A. Would the project conflict with or obstruct implementation of the applicable air quality plan? No Impact.

The City of Covina is located within the South Coast Air Basin. The basin covers a 6,600-square-mile area within Orange County, non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Air quality in the basin is monitored by the South Coast Air Quality Management District (SCAQMD) at various monitoring stations located throughout the area. The adoption and implementation of the draft Housing Element will result in operational emissions which will exceed SCAQMD thresholds. The RHNA housing need (1,337 units) represents a mandate required by the State of California as part of the RHNA's implementation. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. The Covina draft Housing Element will not introduce any additional impacts beyond that previously anticipated under the City of Covina General Plan, the Town Center Specific Plan, or the aforementioned regional plans. As a result, no significant adverse impacts are anticipated.

B. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? No Impact.

The potential short-term air quality impacts associated with the residential development include construction equipment emissions, vehicle emissions, emissions from power generation, and dust from demolition, excavation, grading, and debris transport. As indicated previously, the long-term operational impacts, related to both stationary and mobile (vehicle) emissions, will occur following occupancy. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

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



(including releasing emissions which exceed quantitative thresholds for ozone precursors)? Less Than Significant Impact.

Future residential development associated with the adoption and subsequent implementation of the draft Housing Element will result in both short-term (construction-related) and long-term (operational) terms. As indicated previously, the long-term (operational) emissions for the entire 1,337 unit unmet need will exceed the SCAQMD's daily thresholds. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. As a result, the potential cumulative air quality impacts are considered to be less than significant.

D. Would the project expose sensitive receptors to substantial pollutant concentrations? No Impact.

Sensitive receptors refer to land uses and/or activities which are especially sensitive to poor air quality. Sensitive receptors typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. As a result, no significant adverse impacts on sensitive receptors are anticipated.

E. Would the project create objectionable odors affecting a substantial number of people? No Impact.

The SCAQMD's CEQA Air Quality Handbook identifies those uses that will typically create odors that, in turn, could generate complaints. These uses include agricultural activities, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding operations. The draft Housing Element promotes the development of new housing as a means to meet the City's RHNA. No odors are anticipated once the units are occupied. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

F. Would the project alter air movement, moisture, or temperature, or cause any change in climate? No Impact.

The future residential development anticipated as part of the draft Housing Element's implementation will not involve the construction of structures of sufficient mass or height to cause wind jetting or heat islands. As a result, no impacts related to this issue are anticipated.

3.6 BIOLOGICAL RESOURCES IMPACTS

According to the City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- 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 the U.S. Fish and Wildlife Service;



- A substantial adverse effect on any riparian habitat or other sensitive natural plant community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
- A substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means;
- A substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites;
- A conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? No Impact.

The majority of the potential development sites have been previously developed, and plant life on-site is limited to non-native, introduced, and ornamental species which were used for landscaping. There are no sensitive or endangered animal and plant species within the City. The candidate sites are completely surrounded by man-made improvements. Animal life within the development sites and the surrounding area consist of species commonly found in an urban setting. The Department of Fish and Game's Natural Diversity Database was reviewed to determine the presence of sensitive or endangered animal and plant species within the vicinity of the City. These species are not expected to migrate to the candidate development sites due to the lack of suitable habitat in the area, and the nature and extent of existing development. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

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 U.S. Fish and Wildlife Service? No Impact.

The candidate development sites and the surrounding areas are developed or were previously developed. Walnut Creek, the only remaining riparian area in the planning area, will not be affected. The vegetation and animal species supported in these man-made habitats include species that are commonly found in urban environments. The Walnut Creek, Big Dalton Wash and San Dimas Creek are the only "blue line" streams found in the City. The Big Dalton Wash and San Dimas Creek stream segments found in the City are channelized. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

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? No Impact.



The City is fully urbanized and no natural wetland habitat is found within the candidate development sites. Walnut Creek, the only remaining riparian area in the City, will not be affected. No other natural blue line streams are identified within the City according to topographic maps published by the United States Geological Survey. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

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 life corridors, or impede the use of native wildlife nursery sites? No Impact.

A number of the development sites contain limited vegetation introduced for landscaping. This landscaping does not support significant plant or animal species or their habitats. The City is largely urbanized and there are no natural communities in the area or wildlife migration corridors. As a result, there will not be any impacts related to wildlife dispersal and movement with construction of future development.

E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact.

No locally designated species are found within the candidate development sites or in the surrounding areas. A number of mature trees are found within the project sites though none of these trees appear to be significant or are considered to be "heritage" trees. Thus, no impact to local policies and programs related to resource management or tree preservation is expected with the draft Housing Element's adoption and subsequent implementation.

F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? No Impact.

As indicated previously, the City is largely urbanized, and no natural habitats are found within the project site or in adjacent areas. There are no areas of the City governed by a habitat conservation plan. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

3.7 MINERAL RESOURCES IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant adverse impact on energy and mineral resources if it results in any of the following:

- The loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
- The loss of availability of a locally-imported mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents or the state? No Impact.



No mineral resource extraction activities are located within the affected potential development sites. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

B. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? No Impact.

There are no mineral, oil or energy extraction and/or generation activities within the City. Review of maps provided by the State Department of Conservation indicates there are no abandoned and capped wells within the development sites. The resources and materials used in the construction of 1,337 residential units will not include any materials that are considered rare or unique. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project conflict with adopted energy conservation plans? No Impact.

There are no known mineral, oil, or energy resources on-site though oil resources are found in the surrounding area. None of the candidate development sites are located within any Significant Mineral Aggregate Resource Area (SMARA). The resources and materials used in the construction of the proposed project will not include any materials that are rare or scarce. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

D. Would the project use non-renewable resources in a wasteful and inefficient manner? No Impact.

The future development will require energy for construction and operation, but is not expected to consume energy resources in a wasteful manner. The resources and materials used in the construction of the proposed 1,337 units will not include any materials that are rare or scarce. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

3.8 RISK OF UPSET IMPACTS

According to City of Covina, acting as Lead Agency, a project may be deemed to have a significant adverse impact on risk of upset and human health if it results in any of the following:

- The creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- The creation of 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;
- The generation of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- The locating of a project on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 resulting in a significant hazard to the public or the environment;
- A project located within an area governed by an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport;



- A project located in the vicinity of a private airstrip which would result in a safety hazard for people residing or working the project area;
- The impairment of the implementation of, or physical interference with, an adopted emergency response plan or emergency evacuation plan; or
- The exposure of people or structures to a significant risk of loss, injury or death involving wildland fire, including where wetlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? No Impact.

Future residential development will not be involved in the manufacture, use, or disposal of hazardous materials other than those materials used in a household. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

B. Would the project create a significant hazard to the public or the environment, or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? No Impact.

As indicated previously, the proposed residential uses will not be involved in the storage and distribution of goods which may be considered hazardous. The building plans will be reviewed by the City and the County to ensure that any applicable fire suppression improvements (sprinklers, hydrants, fire flow, etc.) are sufficient in accommodating demand. Future development (multiple-family and senior housing projects) may also be periodically inspected by the Los Angeles County Fire Department to ensure that the new residential development conform to existing health, safety, and fire codes. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? No Impact.

Future residential units contemplated under the draft Housing Element will not be involved in any activities that would emit and/or handle hazardous materials. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

D. Would the project be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? No Impact.

The City is not located within two miles of an operational public airport. The nearest airport is Brackett Airport, located approximately four miles to the east. Ontario International Airport is located approximately fifteen miles to the southeast. As a result, the draft Housing Element's adoption and subsequent implementation will not present a safety hazard related to aircraft or airport operations.

E. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working the project area? No Impact.



As indicated previously, the City is not located within two miles of an operational private airport or airstrip. The nearest airport is Brackett Airport, located approximately four miles to the east. Ontario International Airport is located approximately fifteen miles to the southeast. As a result, the draft Housing Element and its subsequent implementation will not present a safety hazard related to aircraft or airport operations.

F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? No Impact

The potential development sites that may accommodate the projected new housing need of 1,337 units are generally located near arterial roadways that serve as emergency evacuation routes. The development of these sites contemplated under the implementation of the draft Housing Element may involve limited disruption of the roadways for utility connections. However, at no time will these arterial roadways, or any other designated emergency evacuation routes, be closed to traffic due to future construction activities within the project site. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

G. Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fire, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? No Impact

As indicated previously, the candidate development sites and the adjacent properties are located within an urban area. No areas of native or natural vegetation are found within the vicinity of the candidate sites. All of the sites are located outside of any Zone 4 designation, according to maps prepared by the Los Angeles County Fire Department. The Zone 4 designation applies to those areas of the County where the natural vegetation represents a significant wildfire risk. As a result, no risk from wildfire is anticipated with the approval and subsequent implementation of the draft Housing Element.

3.9 NOISE IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant impact on the environment if it results in any of the following:

- The exposure of persons to, or the generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies;
- A substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- The locating of a project within an area governed by an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or private use airport, where the project would expose people residing or working in the project area to excessive noise levels; or
- The locating of a project within the vicinity of a private airstrip which would result in the exposure of people residing or working in the project area to excessive noise levels.



- A. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? No Impact.*

As part of future development of multiple-family residential development, insulation and other design measures will be required to reduce the interior ambient noise levels to 45 CNEL or less. The additional vehicle trips that will be generated by the 1,337 units on a daily basis will be distributed throughout the City. The cumulative traffic will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

- B. Would the project result in exposure of people to or generation of excessive ground-borne noise levels? No Impact.*

Future construction activities could lead to noise impacts on the adjacent residential uses in the absence of mitigation. Construction machinery will be capable of generating periodic peak noise levels ranging from 70 to 95 dBA at a distance of 50 feet from the source. These impacts will be short-term and cease once construction has been completed. All construction activities must conform to the City's Noise Control regulations. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

- C. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? No Impact.*

The future development will involve uses and activities which are not likely to generate significant increases in the ambient noise levels. Traffic noise generated by future development will not result in a measurable or discernable increase in the ambient noise levels. The additional traffic on area roadways will result in noise level increases of less than 3.0 dBA, as indicated previously. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

- D. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? No Impact*

Short-term increases in noise levels will occur during demolition and construction activities. Long-term noise impacts will be associated with additional traffic noise and stationary noise. Demolition and construction activities will generate noise levels in excess of 90 dB within 50 feet of the project site. Construction activities at the project site could lead to noise impacts on the adjacent residential uses in the absence of mitigation. Construction machinery will be capable of generating periodic peak noise levels ranging from 70 to 95 dBA at a distance of 50 feet from the source. These impacts will be short-term and cease once construction has been completed. All construction activities must conform to the City's Noise Control regulations. As a result, no significant adverse impacts are anticipated.



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 expose people residing or working in the project area to excessive noise levels? No Impact.

The City is not located within two miles of an operational airport. The nearest airport is Brackett Airport, located approximately four miles to the east. Ontario International Airport is located approximately fifteen miles to the southeast. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

F. Within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? No Impact.

The City is not located within two miles of an operational private airport. The nearest airport is Brackett Airport, located approximately four miles to the east. Ontario International Airport is located approximately fifteen miles to the southeast. Future residents will not be exposed to aircraft noise from operations at any private airport in the area. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

3.10 PUBLIC SERVICES IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives relative to fire protection services;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impact in order to maintain acceptable service ratios, response times or other performance objectives relative to law enforcement services;
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impact in order to maintain acceptable service ratios, response times or other performance objectives relative to educational services; or
- A substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impact in order to maintain acceptable service ratios, response times or other performance objectives relative to other public services.



- A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives in any of the following areas: fire protection services? Less Than Significant Impact.*

The City of Covina contracts with the Los Angeles County Fire Department which operates three fire stations in the City. Future development will involve the construction of new structures that will employ fire prevention and suppression measured required by the Los Angeles County Fire Department. The Department will review all building plans in subsequent phases of planning and design to ensure that regulations and requirements will be adhered to. The addition of 1,337 new residential units will result in an incremental increase in the demand for emergency services. However, the need development will be reviewed by the Fire Department to ensure compliance with applicable building and safety codes. As a result, the impacts are less than significant.

- B. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives in any of the following areas: Police protection? Less Than Significant Impact.*

The City of Covina Police Department provides law enforcement services in the City. The addition of 1,337 units and potential population will lead in a potential increase in the calls for law enforcement services. The increased service demands may be offset by department review or development plans, the use of security control measures in new development and the continued implementation of ongoing programs that are effective in crime prevention. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. Furthermore, the residential development envisioned as part of the draft Housing Element's implementation is consistent with that contemplated under the City of Covina General Plan and the Town Center Specific Plan. As a result, the impacts are less than significant.

- C. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives in any of the following areas: School services? No Impact.*

Future residential development will be required to pay school development fees. The payment of these fees will mitigate any potential impacts. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

- D. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives in any of the following areas: Library facilities? Less Than Significant Impact.*



The proposed draft Housing Element's adoption and subsequent implementation will involve the continued use of library facilities and services. The addition of 1,337 new housing units will translate into an incremental increase in the demand for library services. This impact may be partially offset by the increase in the taxes and fees that will be collected. As a result, the potential impacts associated with the draft Housing Element's adoption and subsequent implementation, are considered to be less than significant.

E. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives in any of the following areas: Other governmental services? Less Than Significant Impact.

The draft Housing Element will not result in increased demands on other public and governmental services. The draft Housing Element largely calls for existing programs to be continued. As a result, the potential impacts associated with the draft Housing Element's adoption and subsequent implementation, are considered to be less than significant.

3.11 UTILITIES IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- The project requires or results in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts;
- The project requires or results in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- The project results in an overcapacity of the storm drain system causing area flooding;
- The project results in a determination by the wastewater treatment provider which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- The project will be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- The project will not be in compliance with federal, state, and local statutes and regulations relative to solid waste.

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

The potential 1,337 units contemplated under the draft Housing Element will result in increased water consumption. Approximately 344,250 gallons of water per day will be consumed by this additional residential



development. As indicated in the previous sections, the City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. Furthermore, the residential development envisioned as part of the draft Housing Element's implementation is consistent with that contemplated under the City of Covina General Plan and the Town Center Specific Plan. As a result, the impacts are less than significant.

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

The future residential development contemplated under the draft Housing Element is anticipated to generate approximately 247,860 gallons of effluent daily. No new off-site facilities will be required to meet the projected demand. As a result, the impacts are considered to be less than significant.

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

The City of Covina is served by the Los Angeles County Flood Control District which operates and maintains regional and municipal storm drainage facilities. The City works with the Flood Control District in making local drainage plans and improvements. While the majority of the candidate development sites are underutilized, the projected runoff may be accommodated by existing storm drain infrastructure. The projected storm water runoff is not anticipated to significantly increase with future residential development. As a result, impacts are considered to be less than significant.

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

The average water consumption in the City is approximately 8 million gallons per day. The combined water consumption for all of the development contemplated as part of the draft Housing Element's implementation is projected to be 344,250 gallons per day. This consumption is not anticipated to exceed available supplies. As a result, the impact of draft Housing Element's adoption and subsequent implementation are less than significant.

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

The additional 1,337 units are projected to generate 247,860 gallons of effluent on a daily basis. Given the projected demand and the existing remaining treatment capacity, future developments' treatment demand can be met by the service provider. As a result, the impacts are less than significant.



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

Solid waste from future development will be disposed of at the Puente Hills landfill. When this landfill closes early, waste is brought to the Spadra, Nu-Way, or Bradley West landfills. The additional 1,337 residential units possible under the draft Housing Element's implementation are projected to generate 5,508 pounds of solid waste on a daily basis. As a result, the impacts of draft Housing Element's adoption and subsequent implementation are considered to be less than significant.

G. Will the project comply with federal, state, and local statutes and regulations related to solid waste? Less Than Significant Impact.

Future development will be required to comply with any existing or future waste reduction and/or recycling City-initiated programs pursuant to AB 939 requirements. No unique types of waste will be generated by the future residential development anticipated under the draft Housing Element. As a result, the impacts are less than significant.

H. Would the project result in a need for new systems, or substantial alterations in power or natural gas facilities? Less Than Significant Impact.

Future residential development will require connections to power utilities. The potential daily demand for natural gas and electricity has been estimated to be 15,134 cubic feet and 17,520 kWh, respectively. Contacts will be initiated with local energy purveyors to review the potential demand and to determine additional types of mitigation which may be required to reduce consumption. As a result, the impacts from the draft Housing Element's adoption and subsequent implementation will be less than significant.

I. Would the project result in a need for new systems, or substantial alterations in communications systems? Less Than Significant Impact.

The proposed development contemplated under the draft Housing Element's implementation will require connections to telecommunications providers. The necessary connections are provided in the areas where new housing will be constructed. As a result, the potential impacts are considered to be less than significant.

3.12 AESTHETICS IMPACTS

According to City of Covina, acting as Lead Agency, a project may be deemed to have a significant adverse aesthetic impact if it results in any of the following:

- An adverse effect on a scenic vista;
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or
- A new source of substantial light and glare which would adversely affect day or nighttime views in the area.



A. Would the project affect a scenic vista? No Impact

The City of Covina General Plan has not designated any local roadways as "scenic highways." Future residential development contemplated under the draft Housing Element will result in the replacement of older, deteriorating improvements with newer structures. No scenic vistas are present in the vicinity of the potential development sites. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? No Impact.

The potential residential development sites are located within an area that is urbanized. No natural undeveloped areas remain within any of the candidate development sites. No historic or unique structures or sites are found within the proposed development sites or in the immediate area. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? Less Than Significant Impact.

The potential for light and glare will be limited. The greatest potential for spillover lighting affecting light-sensitive residential uses is associated with spill over lighting in parking areas. As a result, the impacts of the draft Housing Element's adoption and subsequent implementation are considered to be less than significant.

3.13 CULTURAL RESOURCES IMPACTS

According to City of Covina, acting as Lead Agency, an action or project will normally have a significant adverse impact on cultural resources if it results in any of the following:

- The project causes a substantial adverse change in the significance of a historical resource as defined in §15064.5;
- The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- The project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature; or
- The project disturbs any human remains, including those interred outside of formal cemeteries.

A. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? No Impact.

The need housing (1,337 units) represents a mandate required by the State of California as part of the RHNA's implementation. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). The majority of the sites identified for new housing development as a means to meet the City's unmet RHNA are located in the downtown area. This development will be governed through the implementation of the Town Center Specific Plan. The draft Housing Element



will not introduce any new impacts above and beyond that envisioned under the Town Center Specific Plan and the City of Covina General Plan. As a result, no significant adverse impacts are anticipated.

B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? No Impact

Any archaeological resources that may have been present prior to development are not expected to be found within the site due to past disturbance. The sites are not considered archaeologically sensitive, since no archaeological resources have been uncovered on-site or in the surrounding area. Limited grading and excavation is likely to be necessary to construct the proposed structures. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

C. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? No Impact.

The majority of the City has undergone extensive ground disturbance resulting from past and present development. The potential for paleontological resources in the area is considered low because no paleontological resources have been uncovered in the area. Thus, construction of future development is not expected to disturb any paleontological resources on site. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

D. Would the project disturb any human remains, including those interred outside of formal cemeteries? No Impact

No cemeteries are known to be located within the vicinity of the potential development sites. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

E. Would the project have the potential to cause a physical change that would affect unique ethnic cultural values? No Impact.

All of the candidate development sites are privately owned, and none are used for any formal or informal religious use. The sites do not represent a culturally significant landmark to any ethnic group. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

F. Would the project restrict existing religious or sacred uses within the potential impact area? No Impact.

No churches are located within the development sites, nor are any such uses contemplated under the City's General Plan. No site is used for religious services. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

3.14 RECREATION IMPACTS

According to City of Covina, acting as Lead Agency, an action or project may be deemed to have a significant adverse impact on the environment if it results in any of the following:

- 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; or,



- The construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? Less Than Significant Impact

Future residential development may result in direct impacts on recreational facilities in the area. However, the potential park impacts will be offset by the payment of park fees or in-lieu dedications. As a result, the impacts are less than significant.

B. Would the project affect existing recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? No Impact

The implementation of the draft Housing Element will not physically affect parks and recreational facilities in the City. None of the candidate sites serve or provide a sanctioned recreational use for the public. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

3.15 TRANSPORTATION & TRAFFIC IMPACTS

According to the City of Covina, acting as Lead Agency, an action or project will normally have a significant adverse impact on traffic and circulation if it results in any of the following:

- An increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);
- An increase in the level of service standard established by the County congestion management agency for designated roads or highways;
- An increase in hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Inadequate emergency access;
- Inadequate parking capacity; or
- A conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

A. Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? Less Than Significant Impact.

The addition of 1,377 housing units will result in an additional 11,000 vehicle trips on a daily basis. Of this total traffic generation, more than 1,100 trips will be generated during the morning and evening peak hours. These trips will be distributed throughout the City, and the level of service of individual intersections will not



be significantly affected. As indicated in the previous sections, the City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. Furthermore, the residential development envisioned as part of the draft Housing Element's implementation is consistent with that contemplated under the City of Covina General Plan and the Town Center Specific Plan. As a result, impacts are less than significant.

B. Would the project exceed, either individually or cumulatively, a level of service standard establishment by the County congestion management agency for designated roads or highways? Less Than Significant Impact.

The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. Furthermore, the residential development envisioned as part of the draft Housing Element's implementation is consistent with that contemplated under the City of Covina General Plan and the Town Center Specific Plan. As a result, the level of service of individual intersections will not be significantly affected. As a result, the impacts are less than significant.

C. Would the project substantially increase hazards due to the design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? No Impact.

The adoption and subsequent implementation of the draft Housing Element would not result in any revisions to the City's Circulation Element. The potential design changes to area roadways will largely be limited to curb cuts. For larger residential projects, the City will require that traffic studies be prepared to evaluate potential traffic and circulation impacts. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

D. Would the project result in inadequate emergency access? No Impact

The development sites that may accommodate the projected new housing need of 1,337 units are located near arterial roadways that serve as emergency evacuation routes. The development of these sites contemplated under the implementation of the draft Housing Element may involve limited disruption of the roadways for utility connections. However, at no time will any of these arterial roadways, or any other designated emergency evacuation routes, be closed to traffic due to future construction activities within the project site. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

E. Would the project result in inadequate parking capacity? No Impact.

Future residential development anticipated as part of the draft Housing Element's implementation will be required to conform to the City's parking standards. No on-street parking overflow is expected as a result of future residential development. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

F. Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? No Impact.



The Los Angeles County Metropolitan Transportation Authority (MTA) and Foothill Transit maintain an extensive network of bus routes throughout the City of Covina area. There are bus stops located in the vicinity of the development sites. The existing bus stops will not be removed as part of the proposed development. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

G. Would the project result in waterborne or air traffic impacts? No Impact.

The nearest port or harbor to Covina is located in the Los Angeles – San Pedro – Long Beach harbor complex located more than 25 miles from the project area. There are no railroads or terminals located within the City that would be impacted by the potential residential development's construction and subsequent operation. As indicated previously, there are no public airports or private airstrips located within two miles of the proposed project. The proposed uses contemplated as part of the proposed project will not impact these facilities. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

H. Would the project result in hazards or barriers for pedestrians or bicyclists? No Impact.

Future development contemplated as part of the draft Housing Element's implementation will not impact existing crosswalks in the City. The potential design changes to area roadways will largely be limited to curb cuts. For larger residential projects, the City will require that traffic studies be prepared to evaluate potential traffic and circulation impacts. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.





SECTION 4. FINDINGS

The Initial Study for the draft Housing Element indicates that the project is not expected to have significant adverse environmental impacts, with the implementation of the recommended mitigation measures. The following findings can be made regarding the mandatory findings of significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- The draft Housing Element *will not* have the potential to degrade the quality of the environment, with the implementation of the recommended standard conditions and mitigation measures included herein.
- The draft Housing Element *will not* have the potential to achieve short-term goals to the disadvantage of long-term environmental goals, with the implementation of the recommended standard conditions and mitigation measures referenced herein.
- The draft Housing Element *will not* have impacts that are individually limited but cumulatively considerable when considering planned or proposed development in the immediate vicinity, with the implementation of the recommended standard conditions and mitigation measures contained herein.
- The draft Housing Element *will not* have environmental effects that will adversely affect humans, either directly or indirectly, with the implementation of the recommended standard conditions and mitigation measures contained herein.

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration, which relates to the mitigation-monitoring program. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB 3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Covina has determined that a mitigation reporting or monitoring program will not be required.





SECTION 5. REFERENCES

5.1 PREPARERS

BLODGETT/BAYLOSIS ASSOCIATES

P.O. Box 844
Whittier, CA 90608
(562) 908-9200
Marc Blodgett, Project Manager

5.2 REFERENCES

- Bugliarello, et. al., *The Impact of Noise Pollution, Chapter 127*, 1975.
- Bureau of Census. *American Fact Finder: Basic Facts: Quick Tables*.
- California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, *1995 Preliminary Report*, 1996.
- California Department of Conservation, Division of Oil, Gas and Geothermal Resources, *Regional Wildcat Map 101*, 1990.
- California Department of Finance, *Population and Housing Estimates for California Cities*, January 2008.
- California Division of Mines and Geology, *Seismic Hazards Mapping Program*, 1999.
- California Employment Development Department, *Current Labor Market Information*, April 2001.
- California Environmental Protection Agency, *Hazardous Material Users/Generators in Los Angeles County*, 2000. California Office of Planning and Research, *California Environmental Quality Act and the CEQA Guidelines*, 1995.
- City of Covina. *Administrative Draft Housing Element*. October 2008
- Federal Emergency Management Agency (FEMA), *Flood Insurance Rate Maps*, 1980.
- Federal Emergency Management Agency, *Interim Maps for the AR Zone*, 1998.
- Institute of Transportation Engineers, *Trip Generation Manual, 5th Edition*, 1992.
- SCAG, *Regional Housing Needs Assessment*, 2008.
- SCAQMD, *CEQA Air Quality Handbook*, 1993 as amended 2008.
- SCAQMD, *Air Quality Data: 1995-1999*.
- SCAQMD, *Air Quality Management Plan*, 2008.
- Stamps, James. *The Historical and Reference Works: Covering Southeast Los Angeles County*. 1965.
- State Water Resources Control Board, *National Pollutant Discharge Elimination System Requirements*, 1990.
- U.S. Department of Agriculture, Natural Resources Conservation Service, *Report and General Soil Map, Los Angeles County*. 1969.
- U.S. Environmental Protection Agency, *Noise from Construction Equipment Operations, Building Equipment and Home Appliances*, 1971.



U.S. Geological Survey, *Evaluating Earthquake Hazards in the Los Angeles Region-An Earth Science Perspective*, *USGS Professional Paper 1360*, 1985.

U.S. Geological Survey, *South Gate 7-2 Minute Quadrangle*, 1998.

