

Queen of the Valley Hospital Specific Plan
Zone Change No. 17-02
Draft Program Environmental Impact Report
SCH No. 2018101068

City of West Covina

April 2019

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SECTION 1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) (*California Public Resources Code*, Sections 21000 et seq.) requires that lead agencies consider the potential environmental consequences of projects over which they have discretionary approval authority prior to taking approval action on such projects. A Program Environmental Impact Report (EIR) is a public document designed to provide the lead, responsible and interested agencies as well as special districts, local and State governmental agency decision makers, and the public with an analysis of potential environmental consequences of a project and to support informed decision making by the lead agency.

1.2 PROJECT LOCATION AND SETTING

The Queen of the Valley Hospital Specific Plan (QVHSP) (“proposed Project” or “Project”) site occupies approximately 28.8 acres and is located at 1135 S. Sunset Avenue in the City of West Covina. The property is at the north corner of South Sunset Avenue and West Merced Avenue, approximately a half mile south of the Interstate-10 (I-10) Freeway in the east-central portion of the San Gabriel Valley. The City is approximately 18 miles east of downtown Los Angeles and 3 miles east of the I-10/Interstate-605 (I-605) Freeway Interchange. The Project also includes 2.8 acres of the former Sunset Field ballfield property in the north corner of the site. The site is in the eastern San Gabriel Valley, which is part of the larger Los Angeles Basin and also within the South Coast Air Basin (SCAB). The Walnut Creek Flood Control Channel is just north of the site, which is under the jurisdiction of various federal, state, and county agencies. The site is essentially flat and fully developed with buildings, parking lots, landscaping, and related improvements and contains no native vegetation or undisturbed land. Surrounding land uses include residential to the northeast and north across the flood control channel, community park facilities to the west, two schools to the south across Merced Avenue, and commercial uses to the southeast and east across Sunset Avenue.

1.3 PROJECT DESCRIPTION

The proposed Project involves the expansion of the existing Queen of the Valley community hospital over the next ten+ years with the use of a Specific Plan and Program EIR. A “specific plan” is a customized regulatory document established in order to provide a flexible means of implementing a General Plan. It provides more focused guidance and regulations and details the permitted uses of specific areas. The proposed QVHSP would govern the future development of the entire hospital campus. In addition to the QVHSP, the Program EIR will also examine “reasonable worst case” assumptions about the ultimate hospital development to address all future potential environmental impacts that could occur as the hospital expands.

The Project will require the following discretionary approvals from the City:

- Adoption of the new Queen of the Valley Hospital Specific Plan (QVHSP).
- General Plan Amendment and Zone Change to change the land use designations of the former Sunset Field city park to commercial use compatible with the QVHSP.
- Certification of the QVHSP EIR and other discretionary approvals.

These and other requested approvals, including approval from other agencies, are further described in Section 3.7, Intended Uses of the EIR.

The Queen of the Valley Hospital (QVH or Hospital) currently has 1,090,000 square feet of building area on 28.8 acres and is proposing to add 490,000 square feet of new buildings to support improved or new medical services on campus. This expansion would be accomplished in phases from 2019 to 2028+ depending on need and financing. Initially four existing buildings (Marian Rooms A and B and Buildings A–C) would be demolished to accommodate new buildings. This initial work would also involve adding surface parking on the former City-owned 2.8-acre Sunset Field park property adjacent and to the north of the hospital grounds.

The first phase (1A) of new construction would involve expansion and new construction of the emergency room and intensive care unit for a total of 66,000 square feet. Phase 1B will entail construction of a new medical office building and ambulatory surgery center and a new multi-story parking structure. Phases 1A and 1B are expected to occur in the 2020-2022 timeframe. Phase 2 construction would occur from 2022-2026 and include a new 5-6 story medical tower with 132,000 square feet of new building space. The final phase of long-range improvements planned for 2028 or later would involve consolidation of the two medical towers, a new medical office building with 90,000 square feet of space, a second multi-story parking structure, and a new hospital building with 132,000 square feet. New buildings may be up to 6 stories tall.

The proposed Project would increase patient and support services, add several new buildings, renovate and demolish a number of existing buildings or structures onsite. One or two stand-alone parking structures may also be included in the master planned changes to the site. These and other possible changes on the site would be phased over a period of many years as funding becomes available and services are needed. The hospital may expand services into the community and may add new services as medical practices change over time (e.g., emergency helicopter service) and needs arise. Details of the Project Description are in Section 3, Project Description of this Program EIR.

1.3.1 PROJECT ALTERNATIVES

In accordance with Section 15126.6 of the State CEQA Guidelines, Section 5.0, Alternatives to the Proposed Project, of this Program EIR addresses alternatives to the proposed Project. Section 5.0 provides descriptions of each alternative; a comparative analysis of the potential environmental effects of each alternative to those associated with the proposed Project; and a discussion of each alternative's ability to meet the Project objectives. The following is a summary description of the alternatives evaluated in this Program EIR:

- **Alternative 1 – No Project (2 versions).** This alternative addresses both types of “No Project” alternatives identified by CEQA: (1A) the No Project/No Development alternative under which the existing hospital uses continue but the proposed Project does not proceed; and (1B) No Project/Existing General Plan and Zoning Alternative, which would allow for minimal expansion of the existing hospital under the existing Specific Plan and develop 50 residential units, at a density of up to 20 units per acre, on the former Sunset Field property, as permitted by the existing land use and zoning designations.
- **Alternative 2 – Reduced Intensity (50 percent).** This alternative would allow for a smaller expansion of the hospital by up to 250,000 square feet or approximately half of the proposed Project. It would also allow different recreational uses on the Sunset Field property (i.e., not athletic fields) such as a dog park or skateboard park.

- **Alternative 3 – Senior Care.** This alternative would allow for minimal expansion of the hospital by approximately 125,000 square feet (25 percent) plus development of a 100,000 square-foot senior housing/services complex on the 2.8-acre former Sunset Field property.

1.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the proposed Project, the key issues to be resolved include decisions by the City of West Covina, as Lead Agency, as to:

- Whether this environmental document adequately describes the potential environmental impacts of the proposed Project;
- Whether the recommended mitigation measures and the design of the Project should be modified and/or adopted as proposed;
- Whether the Project benefits override those environmental impacts that cannot be feasibly avoided or mitigated to a less than significant level;
- Whether there are other mitigation measures that should be applied to the Project besides those identified in the Program EIR; and
- Whether there are any alternatives to the proposed Project that would substantially lessen any of its significant impacts while achieving most of the basic Project objectives.

1.5 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. This Program EIR has taken into consideration the comments received from the public and various agencies in response to the Notice of Preparation (NOP), including written comments received during the NOP and scoping period (Appendix A). Environmental issues that have been raised during opportunities for public input regarding the Project are summarized in Section 2.2 of this Program EIR and are addressed in each relevant issue area analyzed in Section 4.1 through Section 4.15 of this Program EIR.

The primary areas of controversy that have been raised to date are related to the proposed construction being adjacent to residential uses, traffic, parking, noise, and the phasing of construction activities.

1.6 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Table 1-1 presents a summary of the environmental impacts resulting from implement of the proposed Project. Thresholds for which it was determined that no further analysis is required, Agriculture/ Forestry Resources and Mineral Resources, are summarized in Section 7.1, Effects Determined Not to be Significant, of this Program EIR. The potential direct and indirect impacts and cumulative impacts for these topical issues are addressed in Section 4.0, *Environmental Setting and Impact Evaluation Overview*, of this Program EIR. Significant irreversible environmental changes, growth-inducing impacts and energy conservation are addressed in Section 6.0, Other CEQA Considerations.

As shown in Table 1-1, the proposed Project would result in less than significant impacts with incorporation of appropriate project-specific mitigation measures for the following topical areas evaluated in this Program EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology & Soils
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Noise
- Population & Housing
- Public Services & Recreation
- Tribal Cultural Resources
- Utilities & Service Systems

The Program EIR also identified the following impacts that were significant and adverse even with implementation of feasible mitigation:

- **Project Generated Greenhouse Gas Emissions.** The Project would generate Greenhouse Gas (GHG) Emissions, either directly or indirectly, that would exceed the Tier 3 and Tier 4 interim thresholds and would potentially have a significant impact on the environment related to the magnitude and GHG efficiency thresholds. These exceedances are primarily the result of the size of the Project and the associated transportation-related emissions, which cannot be feasibly reduced as the Project has little or no control over vehicular trips to and from the hospital by the patients and visitors. The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, due to the exceedances of the SCAQMD's significance Tier 3 and Tier 4 thresholds, even with the implementation of Mitigation Measure GHG-1, this impact would remain significant and unavoidable.
- **Local Intersection Traffic Impacts.** Even after implementing Mitigation Measure TRA-1, there would still be significant adverse traffic impacts at the following intersections: Merced Avenue/Sunset Avenue (right-of-way [ROW] constraints); Cameron Avenue/Sunset Avenue (PM Peak); and West Covina Parkway/Sunset Avenue (PM Peak) under the Existing Plus Project scenario, as shown in Table 4.13-6, Existing Plus Project Impacts (2018) – Local Intersections – With Mitigation, in Section 4.13, *Transportation/Traffic*. These impacts would remain significant and unavoidable.

Because implementation of the Project would result in unavoidable significant adverse impacts, the City as the Lead Agency must adopt a "Statement of Overriding Considerations" (SOC) before it can approve the Project. An SOC states that the decision-making body has weighed the physical, social, and economic benefits of the project against its unavoidable significant environmental effects and has determined that the benefits of the project outweigh its adverse effects, which are therefore considered to be acceptable.

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Section 4.1 – Aesthetics		
Impact 1.1: The Project would not obstruct northern views of the San Gabriel Mountains or southern views of the Puente Hills along Sunset Avenue to a substantially greater degree compared to the existing conditions resulting from the existing hospital facilities, and impacts related to scenic vistas would be less than significant.	No mitigation is required.	Less than significant.
Impact 1.2: The hospital campus is not located within or near a State scenic highway, and there are no scenic resources, including trees, rock outcroppings, and historic buildings on or in the immediate vicinity of the Project site, so there would be no impacts in this regard.	No mitigation is required.	Less than significant
Impact 1.3: The Project would comply with the development standards and design guidelines in the proposed Specific Plan, would be consistent with existing buildings on the QVH campus, and would not substantially degrade the existing visual character or quality of the site and its surroundings. However, local residents expressed concern about staging areas, building heights, and views during construction, so mitigation is recommended to help assure visual impacts would remain less than significant.	<p>AES-1: Place construction staging areas away from adjacent residences and install perimeter fencing along residential areas during construction.</p> <p>AES-2: Limit building heights to 60 feet in Zones 1 and 2 and 30 feet in Zone 3 adjacent to residential uses per the Specific Plan.</p> <p>AES-3: A detailed shade and shadow analysis shall be conducted prior to approval of building plans for structures over 45 feet or 3 stories in height within 100 feet of the Orangewood Park soccer fields.</p>	Less than significant with mitigation
Impact 1.4: The Project would introduce new sources of light and glare over the short- and long-term conditions. Adherence to the development standards and design guidelines outlined in the Specific Plan would ensure that potential impacts are less than significant. However, local residents expressed concern about staging areas and temporary lighting during construction, so mitigation is recommended to help assure potential light and glare impacts during construction would remain less than significant.	AES-4: Install downward facing or shielded temporary nighttime lighting installed for security lighting during construction to minimize light and glare.	Less than significant with mitigation

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SUMMARY OF PROJECT IMPACTS, MITIGATION,
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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Section 4.2 – Air Quality		
Impact 2.1: The Project would be consistent with the SCAQMD's 2016 AQMP because long-term emissions of non-attainment pollutants do not exceed SCAQMD significance thresholds so impacts would be less than significant.	No mitigation is required.	Less than significant
Impact 2.2: Regional and local construction emissions are less than significant but mitigation is recommended to help reduce VOC emissions during the last phase of construction. Long-term operational emissions of VOC, NOx, CO, PM10, and PM2.5 from mobile and stationary sources would be less than established SCAQMD daily thresholds but mitigation is recommended to help assure potential impacts would be less than significant.	AIR-1: Limit VOC content of paints during Long Range Phase of the Project. AIR-2: All off-road diesel-powered construction equipment shall meet EPA Tier 3 emission standards.	<u>Construction</u> Less than significant with mitigation <u>Operation</u> Less than significant with mitigation
Impact 2.3: Regional and local construction emissions would be cumulatively less than significant with mitigation. Also, long-term regional emissions of VOC, NOx, PM10, PM2.5, and nonattainment pollutants from mobile and stationary sources would be cumulatively less than significant but mitigation is recommended to help assure potential impacts during construction and from emergency generators would remain at less than significant levels.	Please see AIR-1 through AIR-3 .	Less than significant with mitigation
Impact 2.4: Potential exposure of persons to substantial amounts of pollutants could be significant if emergency generators are diesel powered.	AIR-3: All emergency generators will be powered by natural gas.	Less than significant with mitigation
Impact 2.5: The Project does not include any uses identified by the SCAQMD's <i>CEQA Air Quality Handbook</i> , as being associated with odors, so there would be no impacts in that regard.	No mitigation is required.	No impact
Section 4.3 – Biological Resources		
Impact 3.1: The Project and surrounding area do not support native vegetation or habitat suitable for sensitive plant or wildlife species, so there would be no impacts in this regard.	No mitigation is required.	No impact

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Impacts 3.2 and 3.3: The Project does not include riparian habitat, any sensitive natural community, or federally protected wetlands, so there would be no impacts in this regard.	No mitigation is required.	No impact
Impact 3.4: The Project and surrounding area is not within a regional or locally recognized wildlife movement corridor, a native wildlife nursery site, or contains native vegetation. However, the site contains vegetation that may support migratory bird or raptor species, so impacts would be potentially significant.	BIO-1: Conduct a pre-construction nesting bird survey before construction if work occurs during the nesting season. BIO-2: Conduct a pre-construction raptor nesting survey if work occurs during the nesting season.	Less than significant with mitigation
Impact 3.5: The Project site is not within any established Habitat Conservation Plan, Natural Community Conservation Plan, or other approved type of habitat conservation plan, so there would be no impact in relation to these plans.	No mitigation is required.	No impact
Impact 3.6: The Project involves tree removal/replacement that would be consistent with City guidelines. The Project is also consistent with the City's General Plan regarding protection of biological resources, so there would be no impact relative to local regulations for biological resources.	No mitigation is required.	No impact
Section 4.4 – Cultural Resources		
Impact 4.1: There are no known historical sites located on the Project site or in the immediate surrounding area, and no historical sites in the City would be affected by Project development. Therefore, the Project would have less than significant impacts on cultural resources.	No mitigation required.	Less than significant
Impact 4.2: The Project site and the surrounding area have no known archaeological sites. However, there is the potential to encounter unknown buried archaeological artifacts or resources during grading. This would be a potentially significant impact.	CUL-1: Retain an Archaeological monitor prior to grading. If archaeological/historical resources are found, the Archaeologist/Historian will take the appropriate measures to evaluate the resources. CUL-2: Prior to the start of any grading, include on the Grading Plan the following: "If any suspected archaeological resources are discovered during ground-disturbing activities and the archaeological monitor or Tribal representatives are	Less than significant with mitigation

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
	not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist [Insert Number] and appropriate Tribal representatives to the site to assess the significance of the find." CUL-3: An Archaeologist shall monitor grading as outlined in Mitigation Measure CUL-1. If archaeological resources are uncovered they shall be recorded and removed per applicable guidelines.	
Impact 4.3: The Project has the potential to impact unknown paleontological resources due to underlying geologic formations and experience with these formations in other nearby locations.	CUL-4: Project paleontologist to review grading plan and monitor all ground-disturbing activities during Project implementation.	Less than significant with mitigation
Impact 4.4: The Project has the potential to expose buried human remains during grading as this entire area was once inhabited by Native Americans and the site is adjacent to a natural watercourse.	CUL-5: The Project will comply with state law if human remains are found during grading including tribal consultation when necessary.	Less than significant with mitigation
Section 4.5 – Geology and Soils		
Impact 5.1 (i): The Project site is not located in any Alquist-Priolo Earthquake Fault Zones. No known active or potentially active faults traverse the hospital property. No impacts would result.	No mitigation is required.	No impact
Impact 5.1(ii): The Project region contains local and regional active faults and is subject to moderate or severe seismic ground shaking. Therefore, impacts would be potentially significant and require mitigation.	GEO-1: Prior to the approval of improvement plans, the Project will prepare and implement a geotechnical report with specific recommendations for planned improvements.	Less than significant with mitigation
Impact 5.1 (iii): The Project is not located within a Liquefaction Hazard Zone and prior soil exploration reveals a dense granular material and no shallow groundwater table. Therefore, potential liquefaction impacts would be less than significant.	No mitigation is required.	Less than significant

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Impact 5.1 (iv): The Project site is not located within a Landslide Zone, has no significant slopes, and is not susceptible to earthquake induced landslides. Therefore, there would be no significant impacts in this regard.	No mitigation is required.	Less than significant
Impact 5.2: Ground disturbance during grading and construction could lead to erosion and topsoil loss during wind or rain events. Therefore, short-term impacts in this regard would be potentially significant and require mitigation. The Project would cover the site with various impermeable and permeable surfaces, which would minimize the potential for long-term erosion, so there would be no impacts in this regard.	GEO-2: The final Grading Certification will be signed by a California registered Civil Engineer, soil engineer, and geologist (if applicable) and the grading contractor. Grading and soil compaction reports shall be will be submitted to the Building and Safety Official for approval. Please see HYD-1 .	<u>Construction</u> Less than significant with mitigation <u>Operation</u> No impact
Impact 5.3: The Project site is not located within a Landslide Zone or an area with significant slopes. The Project has no risk of lateral spreading, a liquefaction-related event, due to it is not in the Liquefaction Hazard Zone. The site is not located in an area of land subsidence and is not considered a source of unstable soil. Although impacts are expected to be less than significant, implementation of the recommended mitigation would help assure the Project would have no significant impacts relative to seismic-related soil impacts.	Please see GEO-1 and GEO-2 .	Less than significant with mitigation
Impact 5.4: Onsite soils have a low expansion potential but there is a potential to encounter expansive soils. Impacts in this regard would be potentially significant and require mitigation.	Please see GEO-1 and GEO-2 .	Less than significant with mitigation
Impact 5.5: The QVH campus has a piped sewage collection system that conveys wastewater off site for treatment and disposal. The Project would not exceed available capacity, so there would be no impacts in this regard.	No mitigation is required.	No impact
Section 4.6 – Greenhouse Gas Emissions		
Impacts 6.1: The Project's construction and operational related GHG emissions would exceed the SCAQMD's thresholds and therefore impacts would be significant even with the recommended mitigation.	GHG-1: The Hospital will install solar photovoltaic panels that generate at least 25 percent of the additional electricity demand for Project-related improvements.	Significant and unavoidable impact

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Impacts 6.2: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, GHG emissions and their impact would be significant even with the recommended mitigation.	Please see GHG-1 .	Significant and unavoidable impact
Section 4.7 – Hazards and Hazardous Materials		
Impacts 7.1: During construction and operation, the Project would utilize a variety of hazardous materials. However, it would comply with the existing laws and regulations governing those materials, and so would not create a significant hazard to the public or the environment, during construction or operation, through the routine transport, storage, use, or disposal of hazardous materials. Therefore, impacts would be less than significant, and no mitigation is necessary.	No mitigation is required.	Less than significant
Impacts 7.2: The Project has a low potential to result in the accidental release of hazardous materials. However, two schools and residences are proximate to the Project site, which does handle hazardous materials, so mitigation is recommended to help assure there would be no significant impacts to surrounding uses during Project construction from hazardous materials.	HAZ-1: The Hospital shall retain hazardous materials (hazmat) personnel during grading and excavation to make recommendations for the safe removal and disposal of any hazardous materials if they are found during grading. HAZ-2: The Hospital shall provide an assessment for asbestos-containing materials (ACMs) and lead-based paint (LBP) prior to demolition of any structures or interior remodeling of existing buildings.	Less than significant with mitigation
Impacts 7.3: Edgewood Middle School and Edgewood High School are within 0.5 mile of the Project. Project-related hazmat conditions or accidental releases may affect these schools during Project implementation. This is a potentially significant impact requiring mitigation.	HAZ-3: Hospital and local school representatives will meet regularly to review the planned hospital expansion, health and safety issues, and the Hospital's hazmat response/disaster preparedness plans.	Less than significant with mitigation
Impacts 7.4: The DTSC "Cortese List" does not list hazmat sites in or near the Project site, therefore there would be no significant impact in this regard.	No mitigation is required.	No impact
Impacts 7.5 and 7.6: The Project is not located within an adopted airport land use plan or within 2 miles of an airport. Therefore, there would be no significant impact in this regard.	No mitigation is required.	No impact

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Impacts 7.7: The Project site has immediate access from Sunset Avenue and Merced Avenue and the Hospital maintains an up to date emergency and disaster preparedness plan. Therefore, there would be no significant impact regarding these local plans.	No mitigation is required.	No impact
Impacts 7.8: The Project site is in a urban area surrounded by development, roads, and freeways, and there are no habitat conservation plans or natural community conservation plans in the immediate area. Therefore, the Project would have no impacts regarding these local resource protection plans.	No mitigation is required.	No impact
Section 4.8 – Hydrology and Water Quality		
<p>Impacts 8.1 and 8.2: <u>Short-Term Construction Impacts</u> The Project would generate pollutants and other onsite materials that could enter the storm water drainage system and cause significant impacts. Therefore, impacts in this regard would be potentially significant and require mitigation.</p> <p><u>Long-Term Operational Impacts</u> The Project is expected to be a source of bacteria/pathogens, nutrients, and suspended solids that may enter the storm water and cause significant impacts which, would require mitigation.</p> <p><u>Local Policies</u> The Project would be consistent with the City's General Plan and Municipal Code relative to water policies. Therefore, the Project would have less than significant impacts relative to these plans.</p>	<p>HYD-1: Prior to the grading or building permit, the Hospital shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (Construction General Permit). In addition, the Hospital shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) during construction.</p> <p>HYD-2: Prior to issuance of any grading or building permit, the Hospital will implement a Water Quality Management Plan (WQMP) that identifies appropriate Best Management Practices (BMPs) to control storm water and non-storm water pollutants during and after construction.</p> <p>No mitigation is required.</p>	<p><u>Short-Term Construction</u> Less than significant with mitigation</p> <p><u>Long-Term Operational</u> Less than significant with mitigation</p> <p><u>Local Policies</u> Less than significant</p>
Impacts 8.3 and 8.4: The Project would increase onsite runoff which may have significant impacts on downstream properties.	HYD-3: that the Project will implement all applicable Low Impact Development (LID) design requirements during each phase of construction.	Less than significant with mitigation

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Impacts 8.5 and 8.6: The Project site is outside of the 100-year flood plain and does not create any new housing. Therefore, it would have no impacts relative to introducing occupied structures or residents into an area subject to flooding.	No mitigation is required.	No impact
Impacts 8.7: The Project would increase potable water use and offsite runoff and the local groundwater recharge may be incrementally reduced by adding impervious surfaces. These impacts would be potentially significant and require mitigation.	Please see HYD-3 .	Less than significant with mitigation
Impacts 8.8 and 8.9: The Project would not experience flooding from dam failure, seiches, tsunamis, or mudflows, so no impacts are expected in this regard.	No mitigation is required.	Less than significant
Section 4.9 – Land Use		
Impact 9.1: The proposed Project would not physically divide an established community so there would be no significant impacts in this regard.	No mitigation is required.	Less than significant
Impact 9.2: The Project is consistent with the City's General Plan goals with the adoption of a General Plan Amendment, a Zone Change, and the proposed Specific Plan. However, local residents expressed concerns regarding long-term views, lighting and noise, so mitigation is recommended to help assure potential impacts would remain at less than significant levels. The Project is also consistent with SCAG's regional planning goals.	LUP-1: Locate and design future improvements including parking to minimize impacts on local residents related to views, lighting, and noise.	Less than significant with mitigation
Impact 9.3: The Project is not within a Habitat Conservation Plan or a Natural Community Conservation Plan so there would be no impacts relative to these resource conservation plans.	No mitigation required.	No impact

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Section 4.10 – Noise		
Impact 10.1: The noise analysis determined the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels. Therefore, impacts would be less than significant, and no mitigation is needed.	No mitigation is required.	Less than significant
Impact 10.2: The noise analysis determined the Project would not generate or expose persons or structures to excessive groundborne vibration from construction or operation. Therefore, impacts would be less than significant, and no mitigation is needed.	No mitigation is required.	Less than significant
Impact 10.3: The noise analysis determined that Project noise would not exceed established thresholds of offsite noise generated by onsite traffic as well as onsite noise from future onsite sources. Therefore, impacts would be less than significant, and no mitigation is needed.	No mitigation is required.	Less than significant
Impact 10.4: The noise analysis determined the Project would produce construction noise but the Project would comply with the City's "Construction and Building Projects" requirements. Therefore, impacts would be less than significant, and no mitigation is needed.	No mitigation is required.	Less than significant
Impact 10.5 and 10.6: The Project site is not located within an airport land use plan or within 2 miles of a public airport or private airstrip. Therefore, there are no impacts in this regard.	No mitigation is required.	No impact
Section 4.11 – Population and Housing		
Impact 11.1: The QVHSP does not include residential housing so will not induce population growth but will provide for increased employment. Therefore, impacts would be less than significant, and no mitigation is needed.	No mitigation required.	Less than significant
Impact 11.2 and 11.3: The QVHSP has no residential uses so there would be no displacement of people or generate a substantial need for additional housing construction. Therefore, impacts in this regard would be less than significant, and no mitigation is needed.	No mitigation is required.	No impact

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Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Section 4.12 – Public Services and Recreation		
Fire Protection		
Impact 12.1: The Project would increase the demand for fire protection and emergency services. These impacts would be potentially significant and require mitigation.	<p>PS-1: The Hospital shall pay the City's Development Impact Fees (DIFs) prior to issuance of building permits.</p> <p>PS-2: The Project will comply with state and local fire codes relative to fire prevention and suppression improvements, fire hydrants, automatic fire extinguishing systems, access, water availability, and fire sprinkler system, among other measures prior to the issuance of building permits.</p>	Less than significant with mitigation
Police Protection		
Impact 12.2: The Project will increase demand on existing police services and construction may impede emergency access to the site. These impacts would be potentially significant and require mitigation.	PS-3: The Project will implement applicable Crime Prevention Through Environmental Design (CPTED) features.	Less than significant with mitigation
Schools		
Impact 12.3: The Project does not include additional residential therefore it would not result in a direct increase of population and increase the demand on existing schools. These impacts would be potentially significant and require mitigation.	PS-4: The Project will pay applicable school impact fees prior to the issuance of each building permit.	Less than significant with mitigation
Libraries		
Impact 12.4: The Project does not include any residential uses, so it will not result in an increase in population or the demand for library services. These impacts would be potentially significant and require mitigation.	Please see PS-1 .	Less than significant with mitigation
Parks and Recreation		
Impact 12.5 and 12.6, and 12.7: The Project would not add residential uses, so it will not increase the demand on parks or recreational services. Therefore, impacts in this regard would be less than significant, and no mitigation is needed.	No mitigation is required.	No impact

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SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Section 4.13 – Transportation/Traffic		
<p>Impact 13.1: The EIR examined the following four scenarios: (1) Existing Year (2018); (2) Phase 1 Completion (2022); (3) Phase 2 Completion (2026); and (4) General Plan and Project Buildout (2035). All of the scenarios were found to have potentially significant traffic impacts involving the following intersections which require fair share contributions and improvements during various phases of the Project:</p> <ul style="list-style-type: none"> • Cameron Ave/Orange Ave • Cameron Ave/Sunset Ave • Merced Ave/California Ave • Merced Ave/Dalewood St/Garvey Ave • Merced Ave/Sunset Ave • Vine Ave/Sunset Ave • W. Covina Pkwy/I-10 WB Ramps • W. Covina Pkwy/Sunset Ave <p>Impact 13.2: The Project would conflict with the SCAG's congestion management Plan (CMP) regarding traffic impacts during all phases of construction and operation and the City's General Plan. Therefore, mitigation is required.</p> <p>No significant Project-related impacts on local freeways under the jurisdiction of Caltrans would occur.</p>	<p>TRA-1: Fair share contributions and improvements needed for Phase 1.</p> <p>TRA-2: Fair share contributions and improvements needed for Phase 2.</p> <p>TRA-3: Fair share contributions and improvements needed after Phase 2.</p> <p>TRA-4: Traffic Control Plans (TCP) during construction.</p> <p>TRA-5: Provide specific number of parking spaces during short-term improvements.</p> <p>TRA-6: Document need/size of any new parking structures.</p> <p>TRA-7: Parking structures to be open before completion of improvements for that phase.</p> <p>TRA-8: Post signs with compliant procedures for local residents during construction.</p> <p>TRA-9: Provide onsite/offsite parking for construction workers.</p> <p>TRA-10: Provide info to employees on carpooling and ridesharing.</p>	<p><u>Significant and adverse impacts</u></p> <ul style="list-style-type: none"> • Cameron Ave/ Sunset Ave • Merced Ave/ Sunset Ave • W. Covina Pkwy/ Sunset Ave <p><u>Less than significant</u></p> <ul style="list-style-type: none"> • Cameron Ave/ Orange Ave • Merced Ave/ California Ave • Merced Ave/ Dalewood St/ Garvey Ave • Vine Ave/ Sunset Ave • W. Covina Pkwy/ I-10 WB Ramps

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
<p>Impacts 13.3 and 13.4: Hazardous Design Features. The Project site has direct access off of two major arterials adjacent to the Hospital property and would not produce significant traffic hazards.</p> <p>Emergency Vehicle Access. The Project site has sufficient access for police, fire, and other emergency vehicles with direct access from two major arterials and regional access from the I-10 Freeway. Therefore, there would be no impacts in this regard.</p>	No mitigation required.	No impact
<p>Impact 13.5: The Project encourages and facilitates the use of non-vehicular transportation, so it is consistent with the goals and policies of City General Plan. Therefore, there would be no impacts in this regard.</p>	No mitigation required.	No impact
<p>Impact 13.6: Current Hospital activities would not affect air traffic patterns at the El Monte Airport, 5.1 miles northwest the hospital or any other airport in the region. If air ambulance service involving helicopters is implemented, the Hospital would be required to prepare separate planning and CEQA documentation as outlined in the Specific Plan. Therefore, impacts in this regard would be less than significant, and no mitigation is needed.</p>	No mitigation required.	Less than significant
Section 4.14 Tribal Cultural Resources		
<p>Impact 14.1: The Project site and the surrounding area have no known archaeological/tribal cultural sites. However, there is the potential to encounter archaeological/tribal resources during grading. These impacts would be potentially significant and require mitigation.</p>	<p>Please see CUL-1, CUL-2, CUL-3, and CUL-5.</p> <p>TRC-1: Prior to grading, the Hospital will enter into a Cultural Resources Monitoring Agreement with appropriate Tribal Representatives.</p> <p>TRC-2: During grading, affected parties will implement the Cultural Resources Monitoring Agreement. Tribal reps will receive 30 days advance notice from the contractor of grading and trenching activities.</p>	Less than significant with mitigation

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Section 4.15 - Utilities and Service Systems		
Water Supply		
Impact 15.1: The Project would increase demand for wastewater treatment services; however, paying additional fees to the Sanitation Districts of Los Angeles County (LACSD) for conveyance, treatment, and disposal facilities would ensure that Project-related impacts are less than significant, and no mitigation is required.	No mitigation is required.	Less than significant
Impact 15.2: The utility analysis in the EIR determined the Project would require the construction of new water, recycled water, and sewer lines onsite, but no off-site improvements would be needed. With implementation of the recommended mitigation, no significant Project-related impacts related to construction and operation of utility systems would occur.	UTL-1: Water and sewer plans shall be constructed to meet the applicable requirements of Suburban Water Systems and the City Municipal Code. UTL-2: Project-related landscaping will be consistent with the Specific Plan and City Development Standards. In addition, all landscape areas and irrigations systems shall be subject to the City's water efficiency guidelines. UTL-3: Project-related landscaping shall comply with City Landscape Plan requirements.	Less than significant with mitigation
Impact 15.3: The utility assessment in the EIR determined the Project would not require the construction of a new storm water drainage facility or expansion of existing facilities so impacts in this regard would be less than significant.	No mitigation is required.	Less than significant
Wastewater Disposal		
Impact 15.4: The Project's water consumption would be below current estimations and future QVHSP development would comply with City water conservation requirements. These impacts would be potentially significant and require mitigation.	Please see ULT-1 through ULT-3 .	Less than significant with mitigation

**TABLE 1-1
SUMMARY OF PROJECT IMPACTS, MITIGATION,
AND LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project Impacts	Summary of Mitigation Measures	Level of Significance After Mitigation
Impact 15.5: The Project would generate additional wastewater into the system, but the San Jose Creek WRP has the treatment capacity to service the Project. Therefore, impacts in this regard would be less than significant, and no mitigation is needed.	No mitigation is required.	Less than significant
Solid Waste		
Impact 15.6: The Project would result in additional solid waste generation. The Victorville Sanitary Landfill has the capacity to serve the Project during construction and operation. Therefore, impacts in this regard would be less than significant, and no mitigation is needed.	No mitigation is required.	Less than significant
Impact 15.7: The Project would comply with ongoing City waste management programs, and current City disposal rate targets are below the 50 percent rate set by CalRecycle. However, mitigation is recommended to help assure Project uses result in less than significant long-term impacts related to solid waste disposal.	<p>UTL-4: Project-related demolition and construction activities will comply with the City's "Waste Reduction, Reuse and Recycling of Construction and Demolition Debris" requirements.</p> <p>UTL-5: Project-related development will comply with the City's regulations on the proper storage and disposal of solid waste in commercial areas of the City.</p>	Less than significant with mitigation

1.7 **REFERENCES**

Blakely, T. 2018 (July). Personal communication. Email between T. Blakely (Facilities Director, Design and Construction, Queen of the Valley Hospital) and K. Norton (Psomas).

KTGY Group, Inc. (KTGY). 2019 (February). *Queen of the Valley Hospital Specific Plan No. 1 (SP-1)*. Irvine, CA: KTGY.

Psomas. (2018b). Air Quality and Greenhouse Gas Emission Assessment, Queen of the Valley Hospital Specific Plan Project. December 2018.

———. (2018a). (November) Traffic Impact Study for Queen of the Valley Hospital Environmental Impact Report/Master Plan.

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SECTION 2.0 INTRODUCTION

2.1 PURPOSE AND TYPE OF THIS PROGRAM ENVIRONMENTAL IMPACT REPORT

This Program Environmental Impact Report (Program EIR) has been prepared to evaluate the potential environmental impacts associated with the construction and operation of the Queen of the Valley Hospital Specific Plan (QVHSP) (“proposed Project” or “Project”). This is a Program EIR and has been prepared in conformance with the California Environmental Quality Act (CEQA) (California *Public Resources Code*, Section 21000 et seq.) and the State CEQA Guidelines (Title 14, *California Code of Regulations*, Chapter 3, Section 15000 et seq.). The City of West Covina (City) is the Lead Agency under CEQA and is responsible for preparing the Program EIR (State Clearinghouse No. 2018101068) for the entire Specific Plan. The City, as the Lead Agency, will review and consider this Program EIR in its decision to approve, revise, or deny the proposed Project. It should be noted that the immediate improvements planned as part of the QVHSP (i.e., demolition of four buildings and addition of surface parking) will be evaluated at a “project” level in this Program EIR because they are scheduled to begin as soon as the Final Program EIR is certified by the Lead Agency.

This Program EIR is further intended to serve as the primary environmental document for all future entitlements associated with implementation of the QVHSP, including all discretionary approvals requested or required to implement the Project. Subsequent actions will be reviewed as required by Section 21166 of the *Public Resources Code* and Section 15162 of the State CEQA Guidelines. Section 15168 of the CEQA Guidelines states the following:

15168. Program EIR

- (a) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
 - (1) Geographically,
 - (2) As logical parts in the chain of contemplated actions,
 - (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
 - (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.
- (b) Advantages. Use of a program EIR can provide the following advantages. The program EIR can:
 - (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
 - (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
 - (3) Avoid duplicative reconsideration of basic policy considerations,
 - (4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and
 - (5) Allow reduction in paperwork.

- (c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
- (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
 - (2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.
 - (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.
 - (4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.
 - (5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

This Program EIR provides a comprehensive evaluation of the reasonable anticipated scope of the overall Project. It is intended to serve as an informational document for public agency decision makers and the general public regarding the objectives and components of the proposed Project. This document also provides information about potentially significant environmental impacts that may be associated with the planning, construction, and operation of the proposed Project; identifies appropriate feasible mitigation measures; and offers alternatives that may be adopted to reduce or eliminate these significant impacts. In addition, this Program EIR is the primary reference document in the formulation and implementation of a mitigation monitoring and reporting program for the proposed Project.

Throughout the Program EIR document the reader should note that the Immediate Improvements (2019) as well as Phase 1 improvements (through 2022) will be evaluated in greater detail (i.e., at a **project level**) as there is more specific information about these short-term improvements to be made in the next 4 years (2019–2022) compared to more long-term improvements in Phase 2 (2022–2026) and Long Range (2028+) which will be evaluated on a **programmatic level**.

The City of West Covina, as the Lead Agency, has the responsibility for processing and approving the Project. Other public agencies (i.e., responsible and trustee agencies) may consider the information in this Program EIR along with other information that may be presented during the CEQA process in their decision-making or permitting processes.

In accordance with the State CEQA Guidelines, public agencies are required to make written findings for each environmental impact of the project identified in an EIR. If the lead agency and responsible agencies decide that the benefits of the project outweigh any identified unmitigated significant environmental effects, they will be required to adopt a statement of overriding considerations supporting their actions. The discretionary actions involved in the implementation of the proposed Project by the City of West Covina, as well as responsible and trustee agencies, are described in Section 3.6, Intended Use of the EIR.

2.2 **SCOPE OF THIS PROGRAM EIR**

2.2.1 **SCOPING PROCESS**

In compliance with Section 15201 of the State CEQA Guidelines, the City has taken steps to provide opportunities for public participation in the environmental process. A Notice of Preparation (NOP) was distributed on October 30, 2018 to federal, State, regional, and local government agencies and interested parties for a 30-day public review period to solicit comments and inform agencies and the public of the proposed Project. The Project was described, potential environmental effects associated with project were identified, and agencies and the public were invited to review and comment on the NOP and scope of the analysis to be provided in the EIR. A copy of the NOP and comments received are included in Appendix B of this Program EIR.

The City received comments from 11 agencies or individuals in response to the NOP and at the scoping meeting. Table 2-1 provides a brief summary of the issues raised in the NOP comment letters and other correspondence and identifies the respective sections of the Program EIR where the comments are addressed.

**TABLE 2-1
NOTICE OF PREPARATION AND SCOPING COMMENTS**

Agency/Organization/ Individual	Date	Comments	Addressed in Section(s)
Governor's Office of Planning and Research (OPR)(letter)	October 29, 2018	Letter from OPR to state agencies transmitting the Notice of Preparation (NOP) and identifying the official 30-day public review period.	NA
California Highway Patrol (CHP)(email)	November 26, 2018	No comments due to the nature and location of the project (i.e., no freeway impacts)	4.13 – Transportation and Traffic
Department of Toxic Substances Control (DTSC)(2 letters)	November 2, 2018 and November 6, 2018	First letter - Providing address correction for future correspondence. Second letter - Providing guidance on the characterization and, if necessary, remediation of hazardous materials found during grading.	4.7 – Hazards and Hazardous Materials
South Coast Air Quality Management District (SCAQMD)	November 30, 2018	Recommendations on data, methodologies, modeling, and mitigation for air quality and greenhouse gas emissions.	4.2 – Air Quality 4.6 – Greenhouse Gases
Southern California Association of Governments (SCAG)(letter)	November 30, 2018	Guidance on determining if a project is regionally significant and recommending project be evaluated for consistency with SCAG's regional plans.	4.9 – Land Use and Planning

**TABLE 2-1
NOTICE OF PREPARATION AND SCOPING COMMENTS**

Agency/Organization/ Individual	Date	Comments	Addressed in Section(s)
Los Angeles County, Department of Regional Planning (letter and email)	November 8, 2018 (letter) and November 19, 2018 (email)	Representing Airport Land Use Commission (ALUC), stating the project was not within an airport influence zone, so no comments provided. Subsequent email clarified if the project eventually had air ambulance service, they would have comments on helicopter facilities and operations.	4.7 – Hazards and Hazardous Materials 4.13 – Transportation and Traffic
Los Angeles County, Sanitation Districts (letter)	November 30, 2018	Provided information on water quality permitting and sewer service/capacity.	4.8 – Hydrology and Water Quality 4.15 – Utilities
Bill Robinson (2 letters and 1 email)	November 15, 2018 and November 30, 2018 and December 3, 2018 (email)	Questions on the design and appearance of the project buildings, comments on traffic, parking and aesthetic impacts, especially to adjacent uses and residences. Also, provided design suggestions and data sources.	4.1 through 4.15 as appropriate
Greenburg Glusker (letter)	November 30, 2018	Representing Torrey Pines Apartments adjacent to site. Concerned about aesthetics, setbacks, operations, parking, traffic, noise, air quality, safety, etc.	4.1 through 4.15 as appropriate
Dennis Majors (letter)	November 30, 2018	Lives in Walnut and expressed various concerns about the project and its CEQA process, including community input, alternatives, project design, underground parking safety, traffic access, circulation, and congestion, cumulative impacts, and piecemeal development.	2.0, 3.0, and 4.1 through 4.15 as appropriate
Michael McGrath (email)	December 12, 2018	Traffic access to and from the hospital from Merced is inadequate, will it be expanded as the hospital is expanded?	4.13 – Transportation and Traffic

Scoping Meeting

The City of West Covina, as the Lead Agency, held a Scoping Meeting for the QVHSP Program EIR on Thursday, November 15, 2018, at 6:00 PM at the Hospital property. The purpose of the meeting was to receive input on the environmental issues to be addressed in this Program EIR. No agency representatives attended the scoping meeting; however, a total of 13 individuals, including residents of the City of West Covina and Hospital representatives, were in attendance and provided public testimony. Attendees included 3 local residents, 5 hospital staff, and 5 members of the Project team (i.e., City, Psomas, and KTGy). Copies of the sign-in sheets are included in Appendix B. KTGy and Psomas made brief presentations on the proposed Project and the CEQA process, respectively.

The major local concerns appeared to be parking and traffic, and what would happen during construction phasing. Someone asked if the hospital would become a trauma center, the answer was no (County already selected Pomona Valley Hospital). Several questions about future plans, hospital staff said they would be focusing on cardiac and neurology treatment and possibly expand the residency program.

There were a few questions about local General Plan land use and zoning designations, but they seemed more for clarification of existing designations of the hospital and surrounding neighborhoods rather than concerns or issues. A few questions about what areas were actually included in the old vs. the new specific plan. One adjacent neighbor asked if they could be added to the Specific Plan at this point.

The timing of the various construction phases seemed to be the other main concern. Some other questions on the design, appearance, and height of the new tower, and need for seismic retrofitting of old tower.

Native American Tribal Consultation

Pursuant to Senate Bill (SB) 18 and Assembly Bill (AB) 52 requirements, the City contacted 15 tribal representatives from 11 different tribal groups for consultation on the proposed Project. Table 2-2 lists the various tribes and representatives contacted by the City. Under SB 18, tribal groups have 90 days to initiate consultation on a particular project, while tribes under AB 52 have 30 days to express a desire to consult.

**TABLE 2-2
NATIVE AMERICAN TRIBAL CONSULTATION**

Tribal Group	Date	Contact(s)/Comments	Requirement
Gabrielino/Tongva Tribe	8-1-18	Charles Alvarez – no response	SB 18
Gabrielino/Tongva Nation	8-1-18	Sandonne Guad – no response	SB 18
Gabrielino/Tongva San Gabriel Band of Mission Indians	8-1-18	Anthony Morales – no response	SB 18
Gabrielino Band of Mission Indians – Kizh Nation	8-1-18 and 8-8-18	Andrew Salas/Brandy Salas – Letter dated 8-16-18 indicating a desire to consult, then a follow-up email dated 9-27-18 indicating a decision not to consult unless artifacts were found during grading.	SB 18 and AB 52
Barbareno/Ventureno Band of Mission Indians	8-1-18	Raudel Banuelos, Jr. – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Elenor Arrellanes – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Patrick Turnamait – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Julie Turnamait-Stenslie – no response	SB 18
San Manuel Band of Mission Indians	8-1-18	Lynn Valbuena -no response	SB 18
San Manuel Band of Mission Indians	8-1-18	Lee Claus – no response	SB 18
Soboba Band of Luiseno Indians	8-1-18 and 8-8-18	Joseph Ontiveros – no responses	SB 18 and AB 52
Kitanemuk & Yowlumne Tejon Indians	8-1-18	Delia Dominguez – no response	SB 18
Kern Valley Indian Community	8-1-18	Robert Robinson – no response	SB 18
Fernandeno Tatviam Band of Mission Indians	8-1-18	Rudy Ortega, Jr. – no response	SB 18
Santa Ynez Band of Chumash Indians	8-1-18	Kenneth Kahn – no response	SB 18
NOTE: SB 18 notice to consult period ended October 30 (+90 days from August 1, 2018) and AB 52 notice to consult period ended August 31 (+30 days from August 1, 2018).			
Source: City of West Covina Planning Department (see Appendix B)			

Regionally Significant Project

In its NOP comment letter, the Southern California Association of Governments (SCAG) stated that its Intergovernmental review process applies to projects that have regional significance. State CEQA Guidelines Section 15206(b) outlines the criteria for determining whether or not a project has regional significance, as shown below:

15206(b). Projects of Statewide, Regional, or Areawide Significance

(b) The lead agency shall determine that a proposed project is of statewide, regional, or areawide significance if the project meets any of the following criteria:

(1) A proposed local general plan, element, or amendment thereof for which an EIR was prepared. If a negative declaration was prepared for the plan, element, or amendment, the document need not be submitted for review.

(2) A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located. Examples of the effects include generating significant amounts of traffic or interfering with the attainment or maintenance of state or national air quality standards. Projects subject to this subsection include:

(A) A proposed residential development of more than 500 dwelling units.

(B) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.

(C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.

(D) A proposed hotel/motel development of more than 500 rooms.

(E) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

(3) A project which would result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 (Williamson Act) for any parcel of 100 or more acres.

(4) A project for which an EIR and not a negative declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity:

(A) The Lake Tahoe Basin.

(B) The Santa Monica Mountains Zone as defined by Section 33105 of the Public Resources Code.

(C) The California Coastal Zone as defined in, and mapped pursuant to, Section 30103 of the Public Resources Code.

(D) An area within 1/4 mile of a wild and scenic river as defined by Section 5093.5 of the Public Resources Code.

(E) The Sacramento-San Joaquin Delta, as defined in Water Code Section 12220.

(F) The Suisun Marsh as defined in Public Resources Code Section 29101.

(G) The jurisdiction of the San Francisco Bay Conservation and Development Commission as defined in Government Code Section 66610.

(5) A project which would substantially affect sensitive wildlife habitats including but not limited to riparian lands, wetlands, bays, estuaries, marshes, and habitats for endangered, rare and threatened species as defined by Section 15380 of this Chapter.

(6) A project which would interfere with attainment of regional water quality standards as stated in the approved areawide waste treatment management plan.

(7) A project which would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.

Based on these criteria, the proposed Project is not considered regionally significant in terms of CEQA compliance and SCAG's Intergovernmental Review process. However, the Project's consistency with SCAG's regional goals and policies will be evaluated in Section 4.9, *Land Use and Planning*.

2.2.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

The NOP for the proposed Project indicated that all potential environmental issues and impacts of the Project would be evaluated in the Draft Program EIR (see Appendix B). However, the QVHSP Project site does not contain any resources related to Agriculture and Forestry Resources and Mineral Resources. Therefore, these two environmental topics are not included in Section 4.0 of this Program EIR. The following provides a discussion and justification as to why these are not evaluated further in this Program EIR. Refer to Section 7.1, *Effects Determined Not to be Significant*, for a summary discussion of all the environmental effects, which were found to be less than significant.

Agricultural and Forest Resources

The Farmland Mapping and Monitoring Program (FMMP), managed by the State Department of Conservation (CDC 2018), indicates the entire City, including the QVHSP Project site, is classified as “Urban and Built-Up Land”, which contains no agricultural resources. Similarly, the Fire and Resource Assessment Program (FRAP), maintained by the California Department of Forestry and Fire Protection (CDFFP), indicates the entire City, including the QVHSP Project site, does not contain any forest or forest-related resources.

The QVHSP Project site is developed with hospital and medical service-related uses except for the former Sunset Field City park site on approximately 3 acres at the northern portion of the QVHSP Project site. The property, currently developed as athletic fields, contains some ornamental trees but will be redeveloped as a surface parking under the QVHSP Project. The QVHSP Project site contains no agricultural or forest resources, so there is no potential for any significant impacts from the Project relative to agricultural or forest resources. Therefore, these issues will not be evaluated further in this Program EIR.

Mineral Resources

The California Geological Survey (CGS) maintains maps of all mineral and geological resources in the State. According to the CGS mapping website, a portion of the City, including all of the QVHSP Project site, is in an MRZ-2 zone which contains known mineral resources. However, the entire City, including the Project site, is developed with various urban uses, so implementation of the QVHSP Project would have no practical or actual significant impacts on available mineral resources. Therefore, this issue will not be evaluated further in this Program EIR.

2.2.3 POTENTIALLY SIGNIFICANT ADVERSE IMPACTS OF THE PROPOSED PROJECT ADDRESSED IN THIS EIR

Pursuant to Sections 15126.2 and 15126.4 of the State CEQA Guidelines, an EIR is required to identify any potentially significant adverse impacts and recommend mitigation that would eliminate or reduce these impacts to levels considered less than significant. The NOP, NOP comments received, and scoping meeting comments were used to establish the scope of the issues to be addressed in this Program EIR. The City of West Covina determined that additional analysis was required to evaluate potential impacts associated with the implementation of the proposed Project for the following environmental topics. Section 4.1 through 4.15 of this Program EIR provides the environmental analysis and outlines the mitigation program for each of the following environmental topics (the section of the Program EIR where each issue is addressed is identified in parentheses):

Aesthetics (4.1)	Hydrology & Water Quality (4.8)
Air Quality (4.2)	Land Use & Planning (4.9)
Biological Resources (4.3)	Noise & Vibration (4.10)
Cultural & Tribal Resources (4.4, 4.14)	Population & Housing (4.11)
Geology & Soils (4.5)	Public Services & Recreation (4.12)
Greenhouse Gas Emissions (4.6)	Transportation & Traffic (4.13)
Hazards & Hazardous Materials (4.7)	Utilities & Service Systems (4.15)

It should be noted that potential significant unavoidable impacts resulting from the proposed Project have been identified in this document for long-term regional greenhouse gas emissions and traffic (project and cumulative impacts). These significant and unavoidable impacts are also presented in the Section 7.0, *Summary of Environmental Effects*, of this Program EIR. If the City of West Covina, as Lead Agency, determines that unavoidable significant adverse impacts will result from the proposed Project, the City must prepare a “Statement of Overriding Considerations” before it can approve the Project. A Statement of Overriding Considerations states that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits of the proposed project outweigh the adverse effects and, therefore, the adverse effects are considered to be acceptable.

2.3 DOCUMENTS INCORPORATED BY REFERENCE

The following reports and/or studies are applicable to development of the Project site and are hereby incorporated by reference, along with the referenced data and information.

- *2016 General Plan Update and Downtown Plan and Code, City of West Covina, Final Program Environmental Impact Report* (SCH No. 2016021069) certified December 2016 (City of West Covina 2016a). Rincon Consultants, Inc. Relevant citywide and regional environmental setting information, applicable standard conditions and approval and mitigation measures, and city-wide impacts from the General Plan Final EIR are discussed in this Program EIR.
- *West Covina General Plan (“PlanWC”)*, adopted December 2016 (City of West Covina 2016b). Relevant planning and environmental setting information; goals, policies, programs; buildout projections; performance standards; and other information contained in the *PlanWC* are summarized in this Program EIR to discuss existing conditions and regulations in the City and to address the Project’s consistency with the General Plan.

These reports/studies are available for review at:

Public Information and Services Counter
City of West Covina Planning Division
1444 West Garvey Avenue South
West Covina, California 91790
(626) 939-8400
Hours: Monday–Thursday: 7:30 AM to 5:30 PM, closed on Fridays

The City’s General Plan and the General Plan Program EIR are available on the City’s website at:

<http://www.westcovina.org/departments/planning/projects-and-environmental-documents>

2.4 PUBLIC REVIEW OF THE PROGRAM ENVIRONMENTAL IMPACT REPORT

This Program EIR is being distributed to responsible and trustee agencies, other affected agencies, surrounding cities, interested parties, and all parties who requested a copy of the Draft Program EIR in accordance with CEQA. The comment period will run for 45 days and during this period, the Draft Program EIR will be available for review at the following locations:

City of West Covina Planning Department

1444 West Garvey Avenue South

West Covina, California 91790

(626) 939-8400

Hours: Monday–Thursday: 7:30 AM to 5:30 PM, closed on Fridays

West Covina Library

1601 W. Covina Parkway

West Covina, CA 91790

(626) 962-3541

Hours: 10:00 AM to 8:00 PM Monday through Thursday

9:00 AM to 5:00 PM Friday

9:00 AM to 5:00 PM Saturday

Closed Sunday

The Draft Program EIR will also be available on the City's website:

<http://www.westcovina.org/departments/planning/projects-and-environmental-documents>

Following the Draft Program EIR's public review period, responses to written comments received will be prepared and published in a Final Program EIR. The Final Program EIR, which will consist of the Draft Program EIR, any revisions to the Draft Program EIR, a list of commenters, comments received on the Draft Program EIR, and written responses to comments that raise significant environmental issues, will be considered for certification by the City of West Covina City Council, consistent with Section 15090 of the State CEQA Guidelines. All responses to agencies' comments submitted on this Program EIR will be provided to those agencies at least ten days prior to final action on the proposed Project. The City of West Covina must certify the Final Program EIR as adequate prior to any decision to approve or deny the proposed Project. Public input is encouraged at all of the City's public hearings.

2.5 **REFERENCES**

City of West Covina (City) 2016a. Final Environmental Impact Report, 2016 General Plan Update and Downtown Plan and Code. Rincon Consultants, Inc. Adopted December 2016.

City of West Covina (City) 2016b. West Covina General Plan (*PlanWC*). Adopted December 2016.

California Department of Conservation (CDC). *Farmland Mapping and Monitoring Program (FMMP)*. Website accessed October 1, 2018. <http://www.conservation.ca.gov/dlrp/fmmp>

California Department of Forestry and Fire Protection (CDFFP). Fire and Resource Assessment Program (FRAP). Website accessed October 1, 2018. <http://frap.fire.ca.gov/>

California Geological Survey (CGS). Mineral and Geological Resource Mapping. Website accessed October 1, 2018.
<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

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SECTION 3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION

This section provides a description of the proposed Project pursuant to Section 15124 of the California Environmental Quality Act (CEQA) Guidelines. Specifically, this section includes the project location, project background, project objectives, project description, and anticipated discretionary approvals required to implement the proposed Project. The project description is used as the basis for analyzing the proposed Project's impacts on the existing physical environment in Section 4.0 of this Program Environmental Impact Report (EIR).

3.2 PROJECT LOCATION

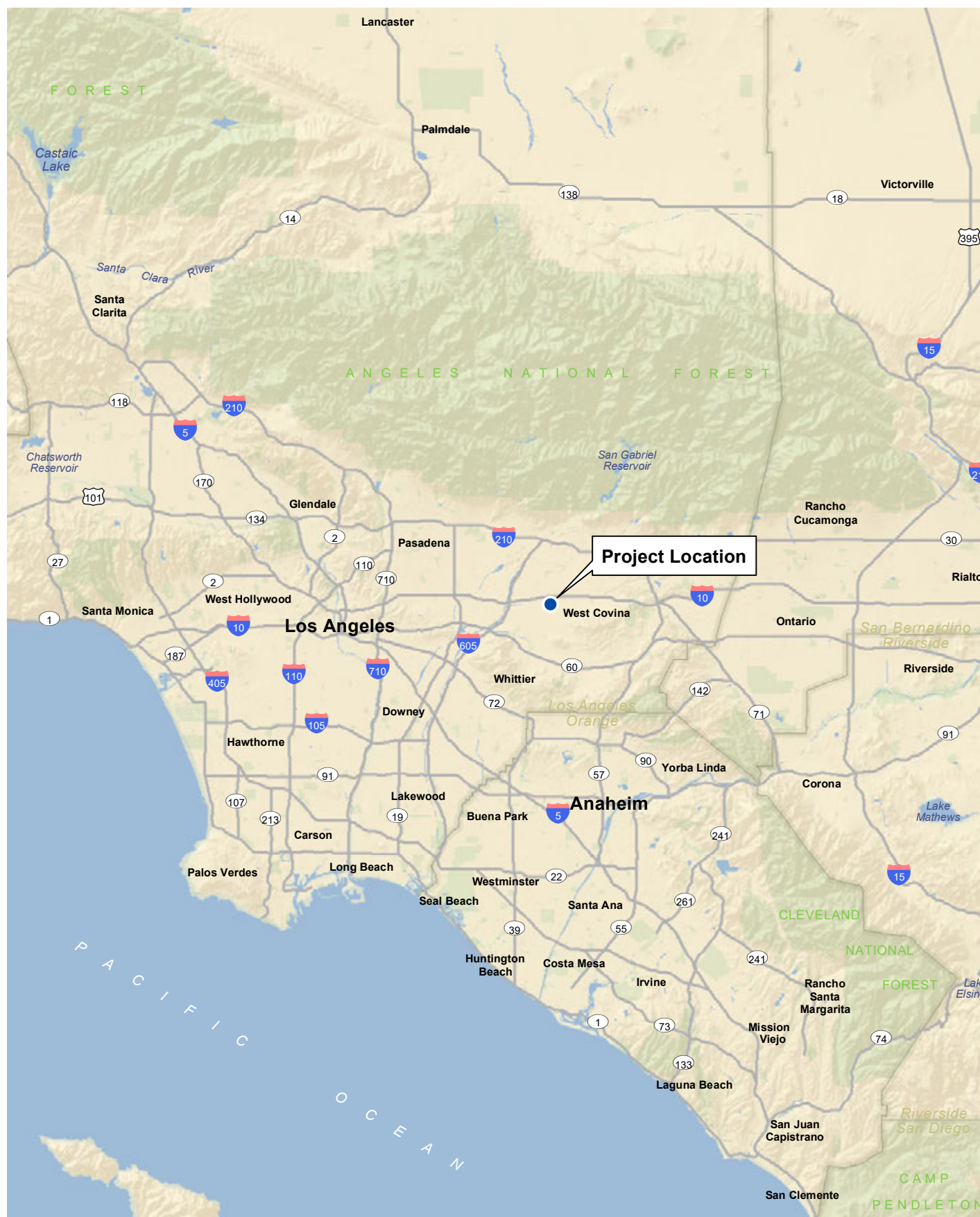
The Queen of the Valley Hospital Specific Plan (QVHSP) Project site occupies approximately 28.8 acres and is located at 1115-1135 S. Sunset Avenue in the City of West Covina. The property is at the north corner of South Sunset Avenue and West Merced Avenue approximately a half mile south of the Interstate (I)-10 Freeway in the east-central portion of the San Gabriel Valley. The City is approximately 18 miles east of downtown Los Angeles and 3 miles east of the I-10/Interstate 605 (I-605) Freeway Interchange. The site is located at 34° 3' 50" North latitude and 117° 56' 43" West longitude, within Section 20 of Township 1 South Range 10 West in West Covina. The property is in the *Baldwin Park* (1972) 7.5-minute series topographic map by the U.S. Geological Survey (USGS). The regional location of the site is shown in Exhibits 3-1 and 3-2 show the Project site and surrounding area on an aerial photograph that also depicts surrounding land uses. Exhibit 3-3 provides various views of the Project site and adjacent land uses.

3.3 PROJECT BACKGROUND

In 1962, the Queen of the Valley Hospital (QVH or Hospital) in West Covina formally opened by the Immaculate Heart of Mary, an order of Catholic nuns and is now a fully accredited nonprofit Catholic health care facility. The key services include: a 12-bed Acute Rehabilitation Unit; full Cardiac Services; Computerized Axial Tomography (CAT) scanning; the Citrus Valley Centers for Rehabilitation Services, which offers speech, occupational and physical therapy services for children and adults; a 26-bed Emergency Room/Department, a 36-bed Intensive Care and Critical Care Unit (ICU & CCU); a 10-bed Operating/Surgical Unit, including robotic surgery equipment; a 40-bed Newborn Intensive Care Unit (NICU), Magnetic Resonance Imaging (MRI) services; a Primary Stroke Center/Neuroscience Unit; a Pediatrics Unit; and a Mammography Center. The Hospital currently serves 160 patients per day, for a total of 58,400 patients per year.¹ The Hospital currently occupies 1.1 million square feet of buildings on approximately 26 acres but is in negotiation with the City to acquire the 2.8-acre Sunset Field Park at the northeast corner of the hospital property to provide additional surface parking until new parking structures can be built. Tables 3-1 and 3-2 summarize the sizes of the existing hospital buildings and grounds and Exhibit 3-4 shows the locations of the existing buildings on the QVH Campus.

It should be noted the Project will allow for new construction to meet State Occupational Safety and Health Administration (OSHA) requirements so the critical care uses can continue within the campus without the need to perform significant seismic upgrades to the hospital building.

¹ 160 patients per day x 365 days per year totals 58,400 patients per year.



Regional Location

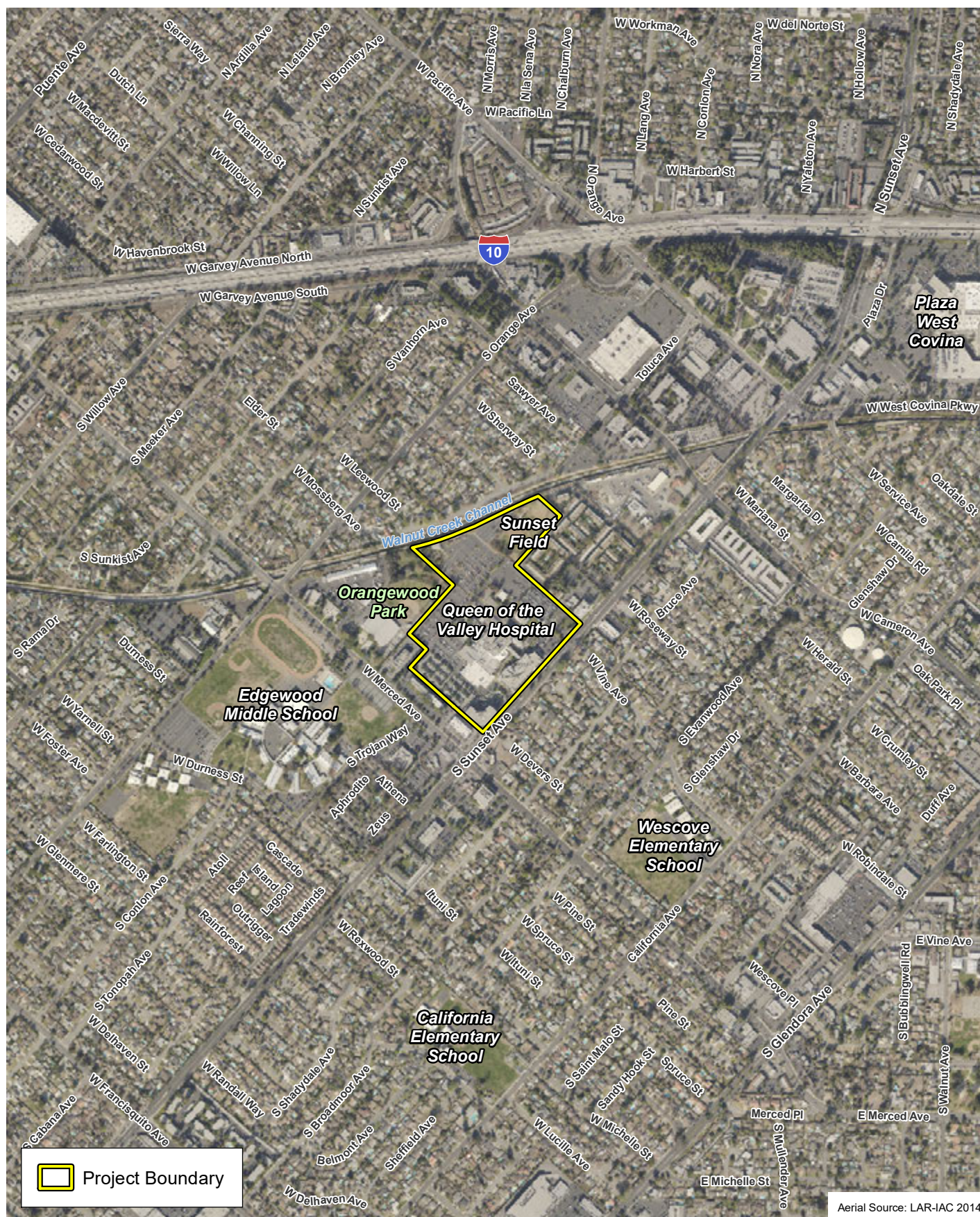
Queen of the Valley Hospital Specific Plan EIR

Exhibit 3-1



10 5 0 10

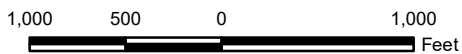
Miles



Project Area

Queen of the Valley Hospital Specific Plan EIR

Exhibit 3-2





Aerial Photograph

Exhibit 3-3

Queen of the Valley Hospital Specific Plan EIR



200 100 0 200
Feet

**TABLE 3-1
EXISTING HOSPITAL FACILITIES**

Facilities	Square Feet	Percent
Main Building	301,714	
MRI Building	3,500	
Mechanical Room	1,500	
Building A	4,704	
Building B	3,364	
Building C	1,914	
Building D	4,704	
Building E	6,144	
Plant Operations Building	5,768	
Marian Building	5,768	
MC Partlin Building	12,000	
Hospitality Buildings	4,300	
Building Sub-Total	355,380	32.6%
Non-Buildings (grounds)	734,020	67.4%
Acres	16.85	
TOTAL		
Square Feet	1,089,400	100.0%
Acres	28.79	
Source: Blakely, T., (2018) Facilities Director, Design and Construction, Queen of the Valley Hospital (See Exhibit 3-4)		

**TABLE 3-2
EXISTING HOSPITAL PARCELS**

APN	Description	Acres	Square Feet
8468-016-910	Former City Park	2.83	0
8468-017-012	Rear (West) Parking Area	9.93	392,590
8468-017-013	Site Entrance/North Parking Area	3.23	0
84680-017-015	Hospital Campus Core	9.02	607,310
8468-017-011	M.O.B. @ 1135 S. Sunset	3.78	89,500
Total	--	28.79	1,089,400
Source: Los Angeles County Assessor's Office, 2018, Assessor Parcel Maps.			

3.4 **PROJECT OBJECTIVES**

Section 15124 of the State CEQA Guidelines establishes the requirement to address project objectives in an EIR project description. In addition to addressing the underlying project purpose, the objectives are also relevant to the development of the alternatives that are considered in the EIR and in the preparation of Findings of Fact and a Statement of Overriding Considerations, if necessary, in support of the decision-making action by the City as the lead agency.



Source: KTG 2018

Existing Hospital Facilities

Exhibit 3-4

Queen of the Valley Hospital Specific Plan EIR



The objectives that have been established for the proposed Project are listed below.

1. **Health Care Needs.** Provide hospital and outpatient service resources that evolve with the health care needs of the surrounding community.
2. **Economic Vitality.** Provide for additional facilities and supporting uses that will create local jobs and improve the economic vitality in West Covina.
3. **Sensitivity to Surrounding Neighborhood.** Plan, construct, and operate the hospital campus facilities in a manner that minimizes disruptions to the surrounding neighborhood.
4. **Design Character.** Establish a cohesive and contemporary design character for the campus that creates a dynamic relationship between the existing and new buildings.
5. **Modern Facilities.** Replace outdated and obsolete buildings with modern facilities that can accommodate innovative therapies for local, national, and international patients.
6. **Enhanced Campus Entrance.** Create a main entrance to the campus that establishes its identity and provides a connection to the surrounding community.
7. **Accessibility.** Ensure that all campus facilities and pathways are accessible to all users.
8. **Multimodal Access.** Improve connectivity by providing enhanced pedestrian and bicycle access to encourage multimodal transportation use.
9. **Transportation Facilities.** Locate transportation facilities—parking, transit stops, and vehicle and pedestrian amenities—in strategic locations throughout the Specific Plan Area.
10. **Facility Integration.** Integrate interrelated facilities in a single site to optimize campus operations.
11. **Wayfinding.** Improve wayfinding for vehicles and pedestrians at campus entrances and within the campus.
12. **Parking Capacity.** Expand parking capacity based on anticipated future demand.
13. **Green Building Standards.** Maximize energy efficiency, indoor air quality, energy-efficient lighting, building orientation, and shading through local and state standards and/or through implementation of LEED principles, and ensure that new buildings on campus comply with CalGreen standards.
14. **Building Systems.** Replace older buildings and infrastructure that require high maintenance with more efficient, lower-maintenance, and environmentally sensitive systems.

3.5 PROJECT CHARACTERISTICS

A “specific plan” is a customized regulatory document established in order to provide a flexible means of implementing a General Plan. It provides more focused guidance and regulations and details the permitted uses of specific areas. The proposed QVHSP would govern the future development of the entire hospital campus. In addition to the QVHSP, the EIR Program will also examine “reasonable worst case” assumptions about the ultimate hospital development to address all future potential environmental impacts that could occur as the hospital expands. The Hospital currently occupies 1.09 million square feet of buildings, and it is anticipated to expand up to approximately 1.58 million square feet (existing plus 490,000 square feet) of medical-related uses/buildings in approximately five phases over at least the next 10 years (2019 – 2028+). Table 3-3 summarizes the construction improvements and activities anticipated during each phase of the QVHSP Project implementation. Table 3-4 summarizes the change in number and

type of beds/rooms that will be provided within the hospital during each anticipated phase of the Project, and Table 3-5 shows the changes in parking that will be provided during each phase of the Project. In addition, Exhibits 3-5 through 3-9 illustrate the anticipated phases of development for the entire Project.

IMPORTANT NOTE: The following discussion of phasing is only an estimate based on current plans and conditions. However, many factors will affect the timing and funding of the planned improvements, so the indicated phasing is merely suggestive of what may occur in the future, but the actual phasing of the various improvements may occur at times different than those indicated in Table 3-3 due to unanticipated delays or conditions. Some phases may even be implemented prior to previous phases indicated in Table 3-3.

**TABLE 3-3
PLANNED BUILDING IMPROVEMENTS FOR THE QVHSP PROJECT**

Phase/ Timeframe	Description ¹	Square Feet (SF)				
		Eliminate Use or Demolition	Internal Rehabilitation/ Reconstruction	New Construction	Sub- Total ²	Total by Phase
Existing (Baseline)	QVH Campus (at present)	--	--	--	1,090,000	1,090,000
Immediate Improvements (2019)	Demolish 4 Buildings (Marian Bld. & Blds A– C) New Surface Parking	20,000 --	-- --	-- See Table 3-5	-20,000 --	1,070,000
1A (2020–2022)	Temp. Reutilize 2 nd floor Expand Surface Parking New ER Expansion Site Entry re-work Central Plant Expansion New ICU Signage/Monumentation	-- -- -- -- -- -- --	15,810 -- -- -- -- -- --	-- See Table 3-5 33,000 -- -- 33,000 --	-- -- +33,000 -- -- +33,000 --	1,136,000
1B (2020–2022)	New Medical Office Building (MOB) and Ambulatory Surgery Center (ASC) New Parking Structure Signage/Monumentation	-- -- --	-- -- --	90,000 See Table 3-5 --	+90,000 -- --	1,226,000
2 (2022–2026)	New 5-6 story Tower Central Plant Expansion Signage/Monumentation	-- -- --	-- -- --	132,000 -- --	+132,000 -- --	1,358,000
Long Range (2028+)	Tower Consolidation Medical Office Building New Parking Structure New Hospital Building	-- -- -- --	-- -- -- --	-- 90,000 See Table 3-5 132,000	-- +90,000 -- +132,000	1,580,000
TOTAL³		20,000	15,810	490,000	--	1,580,000
¹ Abbreviations: ASC – Ambulatory Surgery Center; ER – Emergency Room; ICU – Intensive Care Unit; MOB – Medical Office Building ² Existing square footage rounded off from Table 3-2 ³ Includes additional internal space to accommodate services, facilities, or equipment that not currently envisioned (see EIR Section 3.5.5) Source: <i>Queen of the Valley Hospital Specific Plan, 2019; Queen of the Valley Master Plan, 2018</i> (includes former Sunset Field property).						



Source: KTG 2018

Immediate Improvements

Queen of the Valley Hospital Specific Plan EIR

Exhibit 3-5





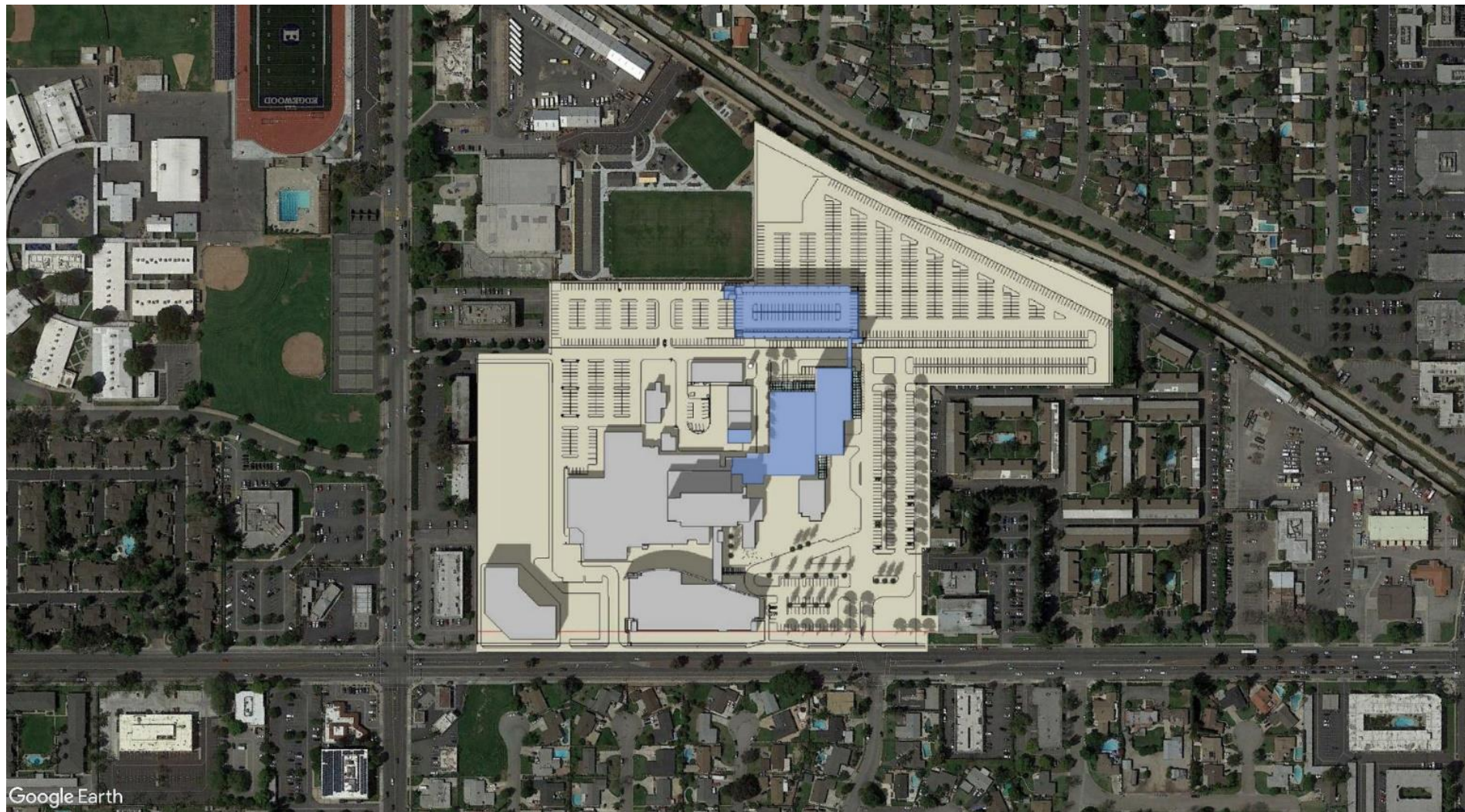
Source: KTG 2018

Phase 1A Improvements

Exhibit 3-6

Queen of the Valley Hospital Specific Plan EIR





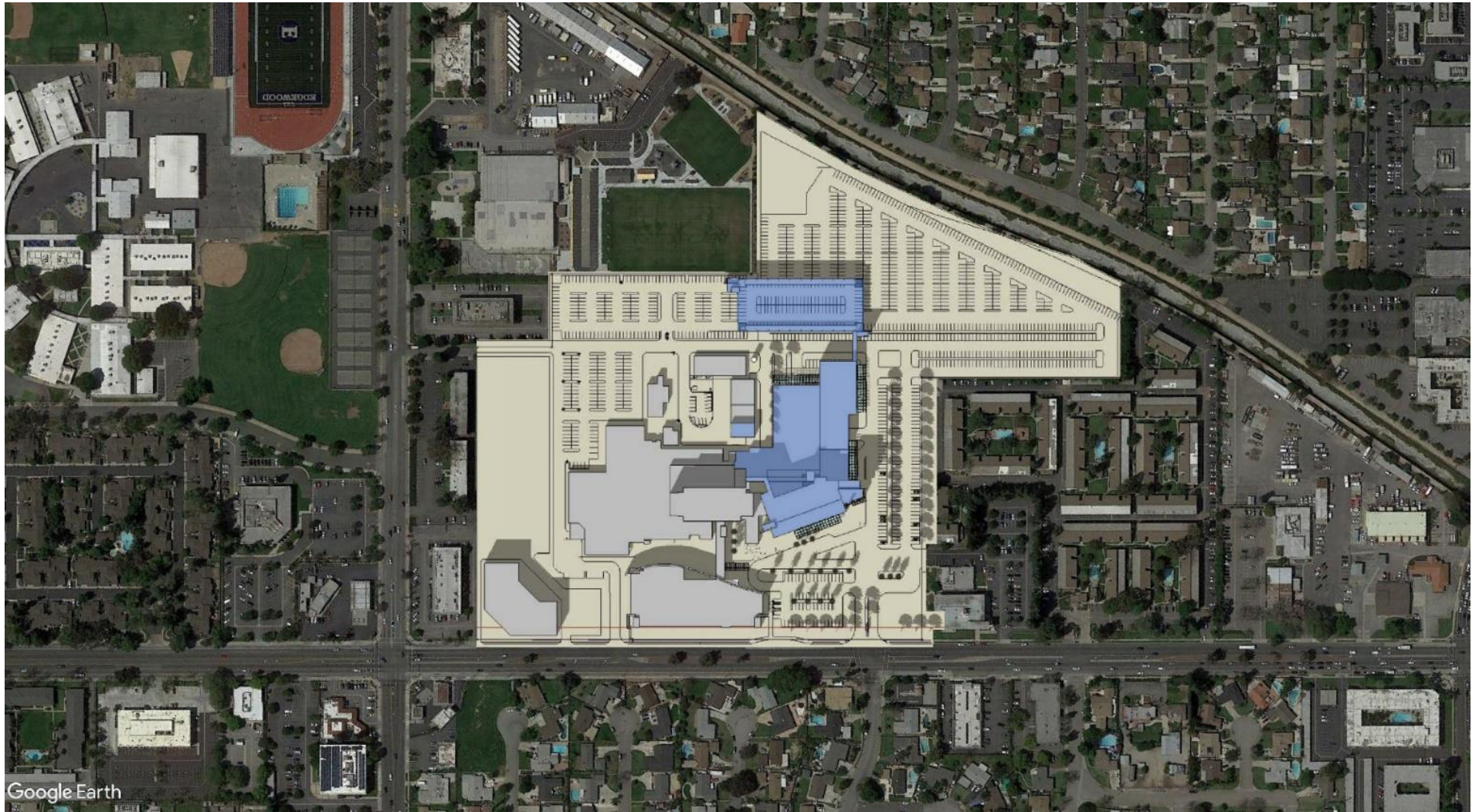
Source: KTG 2018

Phase 1B Improvements

Exhibit 3-7

Queen of the Valley Hospital Specific Plan EIR





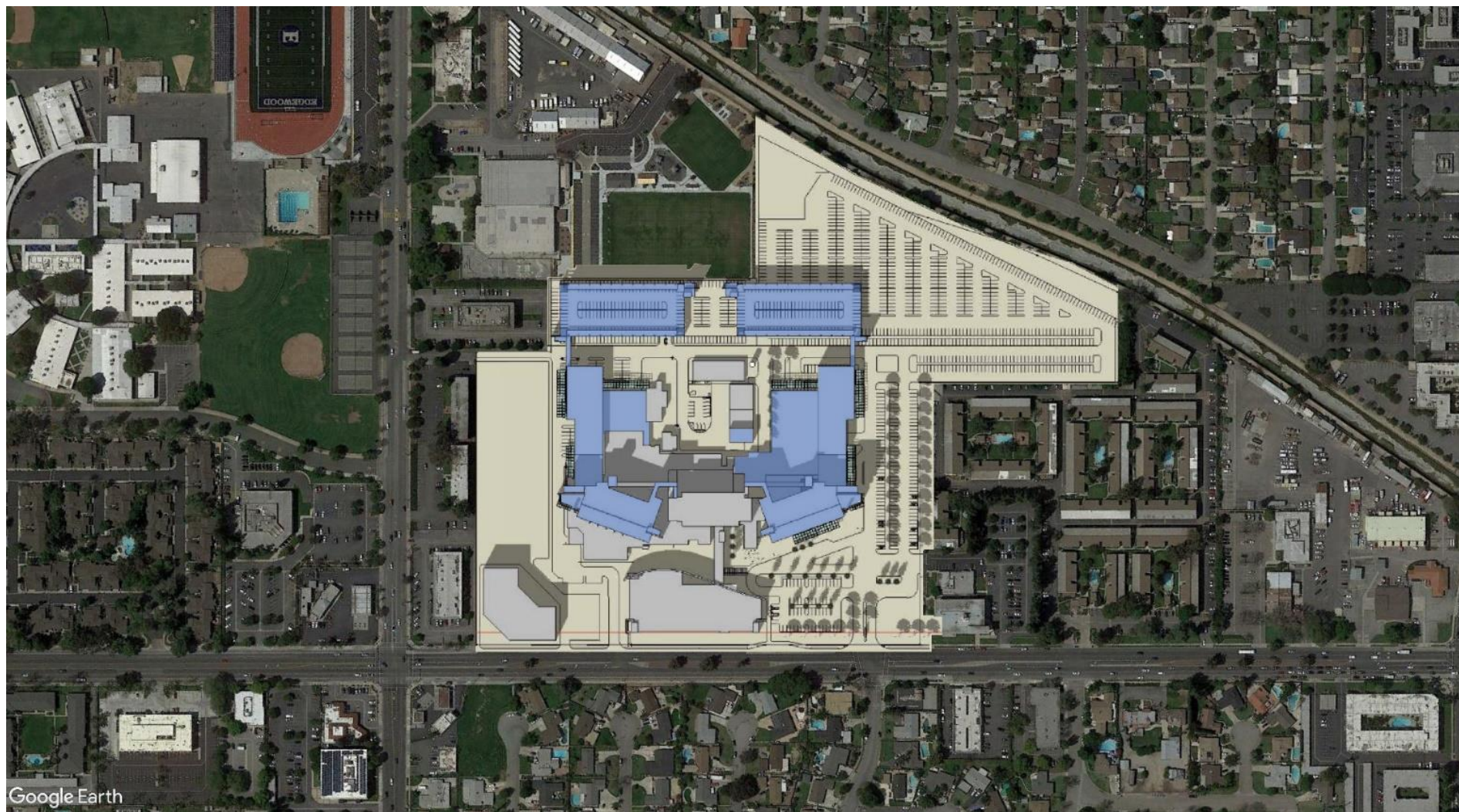
Source: KTG 2018

Phase 2 Improvements

Exhibit 3-8

Queen of the Valley Hospital Specific Plan EIR





Source: KTG 2018

Long Range Improvements

Queen of the Valley Hospital Specific Plan EIR

Exhibit 3-9



**TABLE 3-4
PLANNED HOSPITAL CAPACITY (BEDS) BY PHASE**

Phase	Description ¹	Square Footage Changes	Patient Beds ²	Notes ^{1,2}
Existing (Baseline)	QVH Campus (at present)	1,090,000	325	103 SO & 184 MO rooms
Immediate Improvements (2019)	Demolish 4 Buildings (Marian Bld. & Bld A–C) New Surface Parking	-20,000 --	-- --	-- --
1A (2020–2022)	Reutilize closed 2 nd floor Expand surface parking New Emerg. Room Exp. Site Entry re-work Central Plant Expansion New ICU Signage/Monumentation	-- -- +33,000 -- -- +33,000 --	-- -- +33 -- -- +24 --	-- Reconstruct Sunset Field ER from 27 to 60 bays and repaint building -- Minimal for this phase -- For relocated uses
1B (2020–2022)	New Medical Office Building (MOB) and Ambulatory Surgery Center (ASC) New Parking Structure Signage/Monumentation	+90,000 -- --	-- -- --	 1 st new structure (east) For new MOB & ASC
2 (2022–2026)	New 5-6 story Tower Central Plant Expansion Signage/Monumentation	+132,000 -- --	(325) -- --	Replace beds in existing tower, no net new beds (convert MO to SO rooms) -- For new medical tower
Long Range (2028+)	Tower Consolidation Medical Office Building New Parking Structure New Hospital Building	-- +90,000 -- +132,000	-- -- -- +200	Convert MO to SO rooms -- 2 nd new structure (west) --
TOTAL³ Difference		1,580,000 (+490,000)	525 (+200)	Eventual conversion to all SO beds
¹ Abbreviations: ASC – Ambulatory Surgery Center; ER – Emergency Room; MO – Multiple Occupancy room; MOB – Medical Office Building; SO – Single Occupancy room				
² Ultimate goal is to convert all MO rooms to SO rooms				
³ Includes additional internal space to accommodate services, facilities, or equipment that not currently envisioned (see Section 3.5.5)				
Source: Queen of the Valley Hospital Specific Plan, 2019; Queen of the Valley Master Plan, 2018,				

**TABLE 3-5
PLANNED HOSPITAL PARKING BY PHASE**

Phase	Description ¹	Square Footage Changes	Parking Spaces Needed ²	Parking Spaces Provided ³	Notes
Existing (Baseline)	QVH Campus (at present)	1,090,000	1,134	1,365	Based on data from 2018 parking study
Immediate Improvements (2019)	Demolish 4 Buildings (Marian Bld. & Blds A-C) New Surface Parking	-20,000	1,134	1,715	Convert Sunset Field to temporary parking (+350 spaces)
1A (2020–2022)	Reutilize closed 2 nd floor Expand Surface Parking New Emerg. Room Exp. Site Entry re-work Central Plant Expansion New ICU Signage/Monumentation	+66,000	1,467	1,715	Convert Sunset Field to permanent parking
1B (2020–2022)	New Medical Office Building (MOB) and Ambulatory Surgery Center (ASC) New Parking Structure Signage/Monumentation	+90,000	1,467	2,115	Assumes +400 spaces in 1 st new structure
2 (2022–2026)	New 5-6 story Tower Room Conversions Central Plant Expansion Signage/Monumentation	+132,000	1,467	2,015	Approx. 100 spaces lost due to new buildings and improvements
Long Range (2028+)	Tower Consolidation Medical Office Building New Parking Structure New Hospital Building	+222,000	2,132	2,415	Assumes +400 spaces in 2 nd new structure
TOTAL (Difference)		1,580,000 (+490,000)	2,132 (+998)	2,415+1,050)	See footnotes 2 and 3
¹ Abbreviations: ASC – Ambulatory Surgery Center; ER – Emergency Room; MOB – Medical Office Building ² Maximum needed per Tables 5 and 6 in Parking Study for Queen of the Valley Hospital EIR/Master Plan (Psomas 2018b) which is greater than number of spaces required by City Municipal Code parking standards ³ Minimum required per QVH Specific Plan Source: <i>Queen of the Valley Hospital Specific Plan, 2019; Queen of the Valley Master Plan, 2018; and Parking Study for Queen of the Valley Hospital EIR/Master Plan, 2018b.</i>					

3.5.1 IMMEDIATE IMPROVEMENTS (2019)

These improvements, referred to as “make ready” in the master plan document, are the most immediate improvements planned by the Hospital. This phase is the demolition of four existing buildings, including Building A, Building B, and two Mario Oakwood Rooms, totaling 20,000 square feet. The 3-acre former Sunset Field Park property will be converted to surface parking and provide 350 parking spaces in the northeast corner of the Project site (refer to Exhibit 3-5, *Immediate Improvements*).

3.5.2 PHASE 1A IMPROVEMENTS (2020–2022)

Subsequent to the demolition of the four existing buildings, the 2nd floor of the main hospital building (approximately 15,000 square feet), which is currently closed, will be reutilized for patient rooms. A new Emergency Room/Department will be constructed—10,000 square feet of space will be demolished and 33,000 square feet of new building area will be added to accommodate an increase from 27 to 60 beds (the building will also be repainted at this time). A new Intensive Care Unit will also be constructed for an additional 33,000 square feet of new building area. Additionally, this phase will include minor changes to the Central Plant and the Site Entry area and minor signage and monumentation changes to address the new/reconfigured buildings/uses. These improvements will add approximately 77 patient beds to the existing 325 beds, for a total of 402 beds (refer to Exhibit 3-6, *Phase 1A Improvements*).

3.5.3 PHASE 1B IMPROVEMENTS (2020–2022)

This short-term phase of the work, Phase 1B, will focus on the construction of a new Medical Office Building (MOB) and Ambulatory Surgery Center (ASC) with a total of 90,000 square feet to be located northeast of the existing main building. A new multi-story parking structure with 500 spaces will be built northwest of the existing main building. There will also be minor signage and monumentation changes to address the new building and uses (refer to Exhibit 3-7, *Phase 1B Improvements*).

3.5.4 PHASE 2 IMPROVEMENTS (2022–2026)

This phase centers on the construction of a new 5- to 6-story tall Medical Tower with 304 patient beds and 132,000 square feet located adjacent to the existing main building. This phase will also include room reconstruction and conversion from multiple occupancy to single occupancy. Additionally, the Central Plant will be expanded and upgraded, along with new signage and monumentation.

One option in this phase is a complete seismic retrofit of the existing hospital tower starting sometime in 2022 if the hospital decides not to move forward with construction of the new tower (refer to Exhibit 3-8, *Phase 2 Improvements*).

3.5.5 LONG RANGE IMPROVEMENTS (2028+)

This final phase will include construction of a new 90,000-square-foot medical office building to the southeast of the existing main building. It is anticipated that the conversion from multiple occupancy to single occupancy rooms will be completed in this phase. In addition, a new hospital building may be added with 132,000 square feet of space. At buildout, the hospital will have a total of 525 patient beds/rooms. A second multi-story parking structure will also be added on the north side of the property adjacent to the City's Orangewood Park (refer to Exhibit 3-9, *Long Range Improvements*).

3.5.6 FUTURE TECHNOLOGIES AND SERVICES

Medical Advances. Medical technologies and services are changing rapidly, and the Hospital foresees incorporating these technologies in the coming years. Such advances may include but are not limited to, wireless, mini-cell, or cable expansions; drones or “self-driving” vehicles; convalescent or end of life facilities; genome-editing CRISPR² technology; mergers/buyouts or partnerships involving hospital management; cryogenic or laser-based services; immunological

² Clustered Regularly Interspaced Short Palindromic Repeats (CRISPR) a type of genetic engineering technique.

or other treatments that require limited amounts of radioactive materials, remote health monitoring/ vocal biomarkers; artificial intelligence, robotics, or augmented reality; 3D printing or totally paperless medical records; organ transplantation, and future Health Insurance Portability and Accountability Act (HIPAA) compliance requirements.

Community Involvement. As the Hospital grows and changes, it may sponsor or host more community-oriented events or activities such as walking/running events, blood drives, farmer's markets, and weekend specialty shows. Such activities may occur on weekdays, at night, or on the weekends or holidays.

Infrastructure Changes. In addition to medical technology, the Hospital may implement advances in infrastructure systems or changing cultural or political priorities such as enhanced security, reducing water use, expanded solid waste reduction or recycling, and energy conservation or “green” production. For example, the Hospital may install cogeneration in its Central Plant or install solar energy panels on its new buildings or parking structures.

Assumption of Impacts. As outlined above, the Hospital may implement specific changes to its current activities in terms of medical technology/services, community involvement, and/or supporting infrastructure. The parameters of such changes are unknown at present, but experiences of other hospitals and the recent history of medical advances indicates these changes would be expected to have limited potential for environmental impacts onsite or in the surrounding community.

3.5.7 REVIEW OF FUTURE ACTIVITIES

This Program EIR will examine at a programmatic level the potential for significant environmental impacts to implement future changes in medical technology, services, community events, or supporting infrastructure. In the future, new proposals in these areas considered by the Hospital will be evaluated against the programmatic environmental analysis provided in this Program EIR to determine if they could reasonably result in significant environmental impacts either on-site or in the surrounding community. This evaluation may take the form of a checklist to compare the Program EIR evaluation to the potential impacts of a future action.

Important Note: Any new technologies or services, which require the Hospital to acquire additional property (i.e., outside of the Specific Plan boundaries) may trigger additional CEQA documentation and review by the City, depending on the proposed action, size, location of the property, and other factors.

Air Ambulance (Emergency Helicopter) Service. The one additional service the Hospital may choose to implement is the addition of air ambulance service, which may result in potential noise impacts on the surrounding community. This service would transport patients to or from the Hospital on an as-needed basis. Flights might occur any time during day or night, which might result in noise impacts on City residents depending on the direction and elevation of the flight. A dedicated landing pad would need to be identified on the Hospital property close to the Emergency Department, and it would need to be constructed at either ground level or on the roof of one of the new buildings/parking structures planned in Phase 2 or 3 (see Table 3-2).

Important Note: A proposal to implement air ambulance services at the Hospital would require a formal application to the City of West Covina for a Conditional Use Permit (CUP) if the landing pad is located within 300 feet of an off-site residential use, or if the landing pad is located within Zone 3, as indicated on Exhibit 5.1, Land Use Plan of the Specific Plan, and may trigger a

separate CEQA evaluation of the proposed service. It should be noted that emergency landing facilities are currently permitted by right within the existing Queen of the Valley Specific Plan.

3.6 QUEEN OF THE VALLEY HOSPITAL SPECIFIC PLAN

The QVHSP provides the land use and development standards for implementation of the various phases and components of the proposed expansion on the QVH Campus. In addition, the QVHSP provides design guidelines to assist development on the campus in creating an architectural theme and landscape character. The development standards established in the QVHSP outline the permitted uses, setbacks and general development criteria with and serve as the zoning for the QVHSP area. The following are the major sections of and topics covered by the QVHSP:

- Introduction with objectives and a list of discretionary approvals;
- Plan Context (i.e., relationship to the General Plan, zoning, and surrounding land uses);
- Plan Elements including land uses, pedestrian and bicycle circulation, transit, vehicular circulation, infrastructure (utilities), and grading;
- Design Guidelines including architecture, lighting, sustainable strategies, and signage;
- Development Standards including permitted uses; and
- Implementation including compliance with state health care requirements, future amendments or modifications to the Specific Plan, improvement phasing, and financing.

The entire QVHSP is included in Appendix A of this Program EIR. The following outlines sections or portions of the Specific Plan that are directly relevant to the environmental analyses in this Program EIR:

3.6.1 LAND USES

The proposed Project site consists of 28.79-acres that would allow for a Maximum Potential Intensity of 1,580,000 gross square feet and 525 licensed beds with a maximum Floor Area Ratio (FAR) of 1.26. Section 5.2, *Land Use Plan*, of the QVHSP establishes three zones; Core Medical (Zone 1), Transitional Office (Zone 2), and Transitional Flex (Zone 3) within the QVHSP area. These zones allow for the core hospital facilities and a buffer between the center of campus and the surrounding community, while guiding development at varying intensities (see Table 3-6, *Land Use Summary*).

**TABLE 3-6
LAND USE SUMMARY**

Zones	Acres	Anticipated/Potential Phasing/ Improvements	Maximum Potential Intensity	Maximum Floor Area Ratio (FAR)
Zone 1: Core Medical	18.67	Immediate “Make Ready” Improvement (demolition of 4 Buildings (Marian Bld. & Blds A–C) Phases 1A, 1B, 2, and Long Range Improvements	1,580,000 Square Feet (Gross Floor Area) and 525 Hospital Beds	1.26
Zone 2: Transitional Office	3.73	Medical Office Building in Phase 1B		
Zone 3: Transitional Flex	6.93	Immediate “Make Ready” Improvements (conversion of Sunset Field Park to New Surface Parking)		
Source: <i>Queen of the Valley Hospital Specific Plan</i> , 2019.				

Zone 1. Zone 1 would include the highest intensity and height limit and would house the majority of hospital-related use. Zone 1 could include immediate improvements under the “Make Ready” phase involving the demolition of four existing buildings, including Building A, Building B, and two Mario Oakwood Rooms, totaling 20,000 square feet in addition to the potential improvements under Phases 1A, 1B, 2 and Long Range.

Zone 2. Zone 2 would include moderate intensity uses primarily medical offices and provide a transition to the adjacent office uses.

Zone 3. Zone 3 would primarily consist of parking and supporting services. This zone will have the lowest intensity in the QVHSP area and will provide a buffer from the neighboring apartment complex and single-family homes across the Walnut Creek Wash to the north. Zone 3 could include immediate improvements under the “Make Ready” phase involving the conversion of the 3-acre former Sunset Field Park property will be converted to surface parking.

Further, Section 5.3 of the QVHSP establishes the permitted uses within the Specific Plan Area (See Table 3-7, *Permitted Uses*).

**TABLE 3-7
PERMITTED USES**

Land Use Types	Zone 1	Zone 2	Zone 3
Residential			
Hospitality (i.e., hotel) ¹	CUP	CUP	CUP
Multifamily dwelling	NP	NP	NP
Single-family dwelling	NP	NP	NP
Recreation, Education, and Assembly			
Community assembly/auditoriums and multipurpose facilities	P	P	P
Educational institution (college and/or postgraduate only)	P	P	P
Library, museum/cultural institution	P	P	P
Open space	P	P	P
Recreation facility (passive and active)	P	P	P
Retail			
General retail and/or pharmacy	P	P	NP
Eating or drinking establishment	P	P	NP
On-site sales and/or distribution of alcoholic beverages ²	CUP	CUP	NP
General Services			
Child day care (15 or more children)	P	P	CUP
Long-term care/hospice	P	P	CUP
Personal services, general ³	P	P	P
Place of religious assembly	CUP	CUP	CUP
Medical Services			
Inpatient hospital	P	P	P
Outpatient services (clinic)	P	P	P
Office	P	P	P
Physical therapy/rehabilitation facilities	P	P	P
Data center	P	P	P
Research (laboratory)	P	P	P
Skilled nursing facilities	P	P	CUP
Infrastructure, Communication, Transit & Other			
Accessory uses and structures where related and incidental	P	P	P
Emergency (Medical) Aircraft Landing Facilities (within 300 feet of an off-site residential building)	CUP	CUP	NP
Emergency (Medical) Aircraft Landing Facilities (300 feet or more from an off-site residential building)	P	P	CUP
Wireless communication facilities ⁴	Per Sec. 26-285.980 to 999 of the WCMC	Per Sec. 26-285.980 to 999 of the WCMC	Per Sec. 26-285.980 to 999 of the WCMC
Farmer's Market	AUP	AUP	AUP
<p>P: Permitted Use; NP: Use Not Permitted; CUP: Conditional Use Permitted required; AUP: Administrative Use Permit</p> <p>¹ Includes graduate student housing and short-term lodging and accommodations for patients, Campus guests, and others.</p> <p>² Only relates to hospitality, retail, restaurant uses where alcohol is sold for on-site consumption. Fundraising and philanthropic events, as well as conferences and meetings, involving alcohol sales or service for on-site consumption area may be allowed subject to state Alcoholic Beverage Control (ABC) requirements.</p> <p>³ Personal Services, General include, but are not limited to, the following: acupuncture, barber and beauty shops, dry cleaning, nail salon, shoe repair, tailors and seamstresses.</p> <p>⁴ Where applicable, all wireless telecommunication facilities must meet the standards of City of West Covina Municipal Code Section 26.685.988.</p> <p>Source: <i>Queen of the Valley Hospital Specific Plan</i>, 2019.</p>			

Temporary Uses

Temporary Uses include short-term activities that would be compatible with adjacent and surrounding uses in light of compliance with Section 5.3.1 of the QVHSP and the Noise Regulations of the City of West Covina (West Covina Municipal Code Chapter 15, Article IV).

Exempt Temporary Uses. These uses include minor and limited duration temporary uses, which will not require the issuance of a Temporary Use Permit and are exempt from the requirement for a Temporary Use Permit. Permits may be required by the Building and Safety, CAL OSHA, and/or other regulating governmental agency or department, before the beginning of the event/use. Uses that do not fall within the categories defined below shall comply with the regulations for Permitted Temporary Uses.

3.6.2 PERMITTED TEMPORARY USES AND SPECIAL EVENTS

Permitted temporary uses and special events – non-exempt temporary uses, shall require a Temporary Use Permit subject to compliance with the Community Development Director's approval. Other permits may be required by the Building and Safety, CAL OSHA and/or other regulating governmental agency or department, before the beginning of the event/use.

Development Standards

Development standards established in the Specific Plan are identified in Section 5.4, *Development Standards* of the Specific Plan. Primary development standards are established in Section 5.4.1, *Primary Development Standards*, and include building setbacks, height, and orientation applicable to all future projects involving new construction. Secondary development standards, established in Section 5.4.2, *Secondary Development Standards* of the Specific Plan include open space, landscaping, hardscape, and furniture; fences and walls; and utility/service areas. The development standards establish physical standards to guide the development of the QVH Campus.

In addition to these development standards, mobility and design guidelines are provided in Chapters 3, *Plan Elements* and Chapter 4, *Design Guidelines* of the Specific Plan, respectively. The development standards, in conjunction with the mobility and design guidelines, are intended to foster a walkable and accessible campus environment; provide space and amenities for on-site buildings relative to their district; and create a reasonable buffer from adjacent, off-site uses.

Primary Development Standards

Primary development standards are associated with building setbacks, height and orientation and apply to projects involving new building construction, additional square footage, and additional building height (refer to Section 5.4.1, *Primary Development Standards* of the Specific Plan). Development regulations for building orientation, height, separations, are provided in Table 5.3, *Primary Development Standards* of the Specific Plan. Required setbacks are depicted in Exhibit 5.2, *Setbacks* of the Specific Plan.

Required building orientation relates to the overall campus design and includes guidelines and standards for accessibility, safety, and ease of navigation in the Specific Plan Area for hospital visitors, staff and patients. Design guidelines related to orientation are included in Section 4.2.1, *Building Placement and Orientation*. Section 5.4.1, *Primary Development Standards* includes maximum height standards to strategically locate taller structures toward the interior of the QVH

Campus and away from adjacent residential neighborhoods and roadways including South Sunset Avenue and West Merced Avenue.

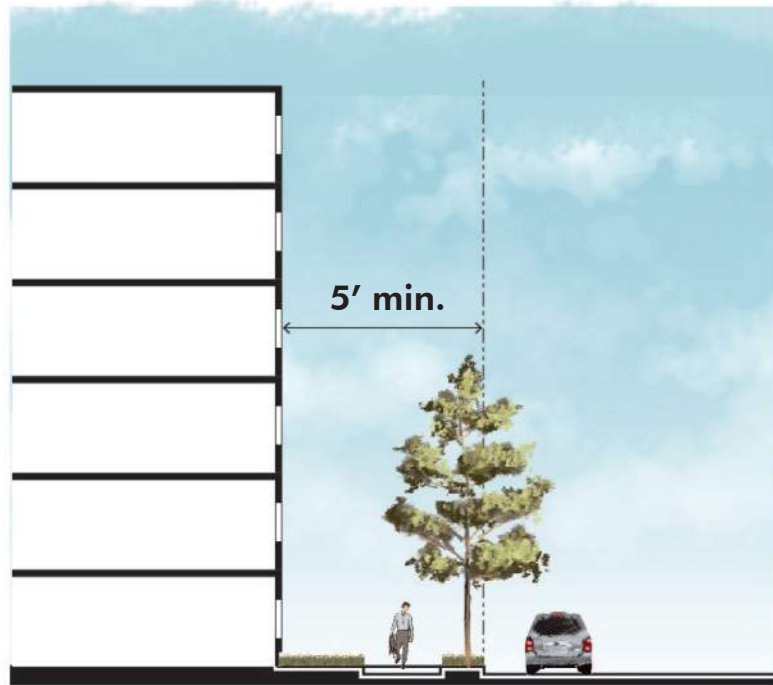
The setbacks establish the relationship between uses adjacent to the Specific Plan Area and proposed uses within the Specific Plan Area. Representative illustrations of these setbacks are provided in Section 5.4, *Development Standards*, of the proposed Specific Plan and included in Section 4.1, *Aesthetics*, of this Program EIR. Minimum setback configurations presented in the proposed Specific Plan are established to provide for landscaping and as a buffer from vehicular/pedestrian traffic and buildings. Building setbacks for development from internal roadway right-of-way and South Sunset Avenue, along the Specific Plan Boundary, and between buildings are depicted in Exhibit 3-10a and 3-10b, *Setbacks*. In addition, utilities such as backflow preventers and transformers, would be exempt from the setback requirements established in the Specific Plan.

As previously identified, building orientation, height, and separations are shown in Table 3-8 below, as established in Table 5.3, *Primary Development Standards*, of the proposed Specific Plan.

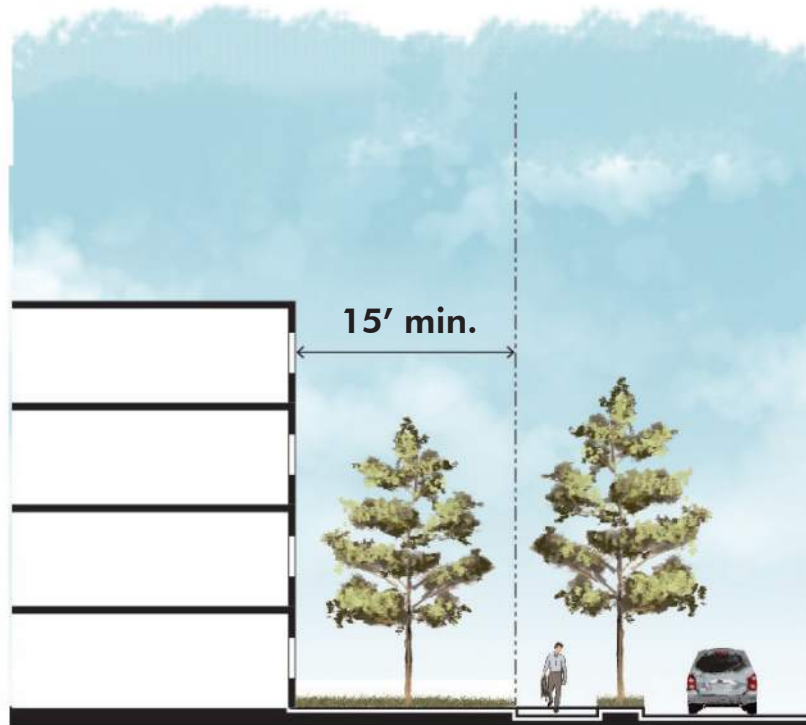
**TABLE 3-8
PRIMARY DEVELOPMENT STANDARDS**

Standard	Requirement
Building Orientation	
Toward internal roadway/pedestrian access	Primary Entrance
Toward open space area	Secondary Entrance
Height	
Primary building height	6 stories max. 4 stories max. within 50' of Sunset Ave. 3 stories in Zone 3
Portions of the building that extend above the primary building height ¹	20 ft. max ⁷
Parking structures ²	60 ft. max
Modular structures ³	30 ft. max
Separations⁴	
Building from internal roadway ⁵	5 ft. min.
From South Sunset Avenue ROW	10 ft. min.
From Specific Plan boundary ⁵	15 ft. min. from Walnut Creek Wash, Residential, or Open Space
Between primary buildings ⁶	15 ft. min.
¹ Portions of the building such as screened mechanical and electrical towers, chimneys, staircases, elevators, architectural elements such as towers, cupolas, domes, etc., and other integral parts of the building may project above the roofline of the uppermost floor, provided these elements do not constitute more than 15 percent of the roof area. ² Parking is allowed on the top deck of parking structures. Light standards and parapet walls exempt from height. ³ Modular structures are prohibited from being visible from any public right-of-way. As measured from front of curb. ⁵ When the boundary is not along South Sunset Avenue, it will be measured from the property line.. ⁶ Buildings may be physically connected to each other subject to applicable building and fire codes, and secondary buildings do not need to observe these setback distances. ⁷ Surface parking lots are subject to separate standards provided in this Section.	
Source: <i>Queen of the Valley Hospital Specific Plan</i> , 2019.	

Setback from Internal Roadway



Setback from South Sunset Avenue

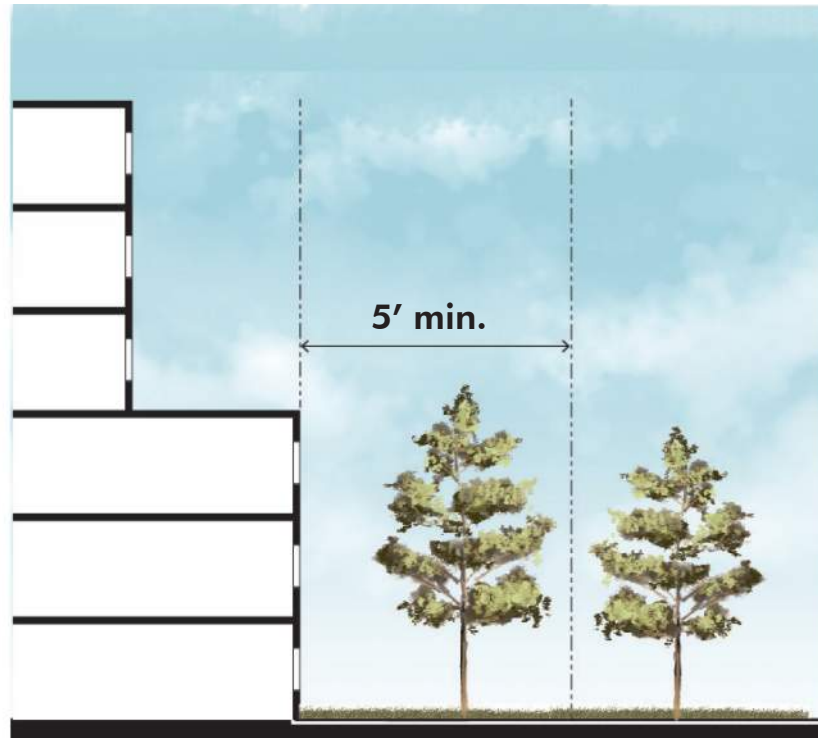


Setbacks

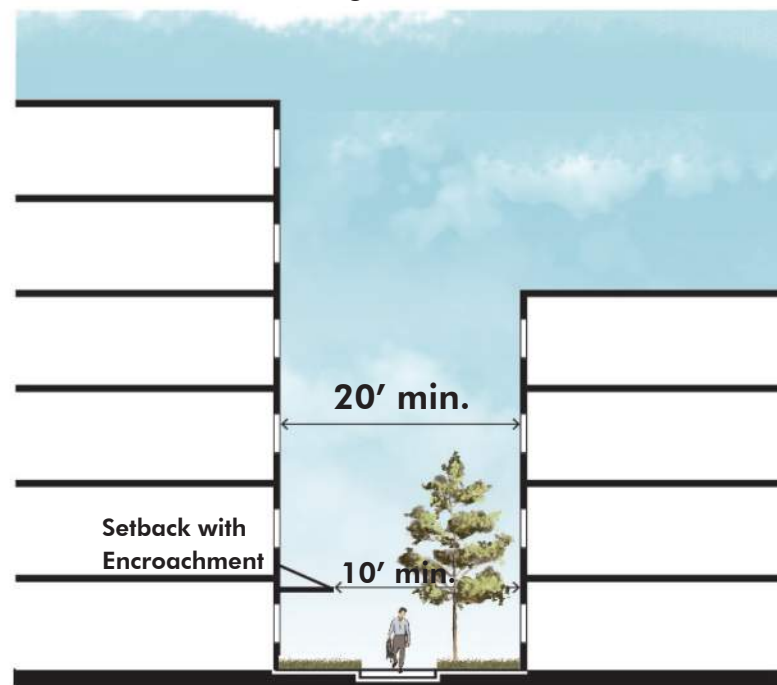
Queen of the Valley Hospital Specific Plan EIR

Exhibit 3-10a

Setback from Specific Plan Boundary



Setback between Buildings



Setbacks

Exhibit 3-10b

Queen of the Valley Hospital Specific Plan EIR

Secondary Development Standards

Secondary development standards establish requirements for elements of the proposed Project such as open space, landscaping, hardscape, and furniture; fences and walls; and utility/service areas. The following provides a description of the secondary development standards:

Landscaping

Landscape areas refer to all areas not used for buildings, roadways, parking/truck loading, or storage and, unless otherwise noted, include all pedestrian areas, plazas, and walkways. Landscape design standards and guidelines are provided for a variety of open space and landscape areas, softscape, irrigation, hardscape, and outdoor furniture. In addition, sustainable site design practices are incorporated for new landscaping and renovations, including the use of native and drought-tolerant plants, preservation of the natural ecosystem, replenishment of groundwater, and reduction of waste. Outside of the required landscaped setbacks shown above in Table 3-H, Primary Development Standards, provisions for landscape and open space, hardscape, and outdoor furniture would be pursuant to the Specific Plan design guidelines provided in Section 4.4, *Landscaping*, of the Specific Plan.

Fences and Walls

The proposed Specific Plan would include requirements for all new interior fences and walls, retaining walls, and screening walls within the Specific Plan area. These include provisions related to compatibility with surrounding site improvements. Fences along buildings, retaining walls in the interior of the Specific Plan Area, and screening walls would be designed compatible with the scale, material, and color of adjacent buildings and landscaping. The setbacks for fences and walls are measured from back of curb for internal streets and the property line for public rights-of-way. Design guidelines and development standards related to fences and walls are provided in Section 4.4.5, *Walls & Fences*, and Section 5.4.2, *Secondary Development Standards*, of the Specific Plan.

Lighting

Lighting is a primary contributor to the security and safety of the campus during nighttime hours. Lighting provisions are established to promote energy efficiency, address safety and security needs, and minimize light pollution and spill-over to the adjacent uses. Lighting design standards and guidelines are provided in Section 4.5, *Lighting*, and Section 5.4.2, *Secondary Development Standards*, of the Specific Plan.

Environmental Sustainability Strategies

Section 4.6, *Environmental Sustainability Strategies* and Section 5.4.2, *Secondary Development Standards* of the Specific Plan, provide environmental sustainability standards and guidelines related to energy efficiency, occupancy health, lighting, minimization of heat island, water quality, and recycling. These standards and guidelines emphasize sustainable development practices and best management.

Architecture

Section 4.3, *Architectural Guidelines*, of the proposed Specific Plan provides a design framework that includes individual building programs to convey the desired built environment characteristic of a state-of-the-art hospital and medical research campus. The built environment of the Specific Plan Area would exhibit design quality and include elements such as articulated entries and facades, quality and sustainable building materials, color and finishes to create design continuity, and windows that incorporate design and efficiency.

Photographs shown in Exhibits 3-11a and 3-11b depict the conceptual vision for the proposed development including architecture design for the proposed development. These include materials and articulation to break up the building massing; building with multiple material types (glass, brick, and concrete); varying window glass sizes; and material uses and articulation along building façade. It should be noted that the images in these exhibits are representative examples that comply with the design guidelines although there are other design applications that could also meet the design guidelines.

A variety of materials, texture, patterns, colors, and details on building façades would be incorporated in the campus' design theme. Color and finishes on all exterior elevations of a building would be coordinated to provide a total continuity of design. Development of the campus would incorporate the use of durable, sustainable, low-maintenance, high-quality materials appropriate to the architectural character of the campus and provide long-lasting buildings that could be adaptively reused over time. Greater attention to detail and architectural quality would be incorporated at the ground level of buildings to promote active streetscapes and engage pedestrians. Buildings and structures adjacent to public roadways and pedestrian pathways would incorporate human-scaled building features such as windows, doors, and entry features, at the pedestrian level.

Architectural features such as garage openings, parapets, and screens, would be designed compatible with the building design. Where appropriate, buildings would incorporate materials with a higher recyclable content, such as stucco, glass, tile, or metal. Accent materials with a bolder texture or color (e.g., stone, brick, mosaic, or signature metals) would be used to highlight entrances or notable architectural elements of new structures.

Additionally, roof-mounted equipment would be screened from ground level view through the use of durable and complementary roof and rooftop screening materials that integrate with the architectural character and theme of the buildings; ground-mounted equipment and meters would be visually screened.

Pedestrian and Bicycle Circulation

Section 3.3, *Pedestrian & Bicycle Circulation*, of the Specific Plan discusses the proposed pedestrian and bicycle circulation for the Project area. The circulation plan addresses local circulation requirements and reinforces the goal of creating a pedestrian and bicycle-friendly environment. Where feasible and appropriate, the QVHSP encourages pedestrian-friendly connections to all buildings, structures, and to the public rights-of-way. For additional detail regarding pedestrian circulation refer to Section 3.3.1, *Pedestrians*, in the Specific Plan. Existing nearby bicycle routes and facilities within the Project area are shown on Exhibit 3-12, *Bicycle and Pedestrian Network of the Specific Plan*. Existing bicycle facilities near the Specific Plan area are located on South Sunset and West Merced Avenues. As identified in Section 3.3.2, *Bicycles*, of the Specific Plan, Chapter 22, Article III of the West Covina Municipal Code defines standards for Class I Bike Paths, Class II Bike Lanes, and Class III Shared Routes. Additionally, future



Example of materials and articulation to break up the building massing.

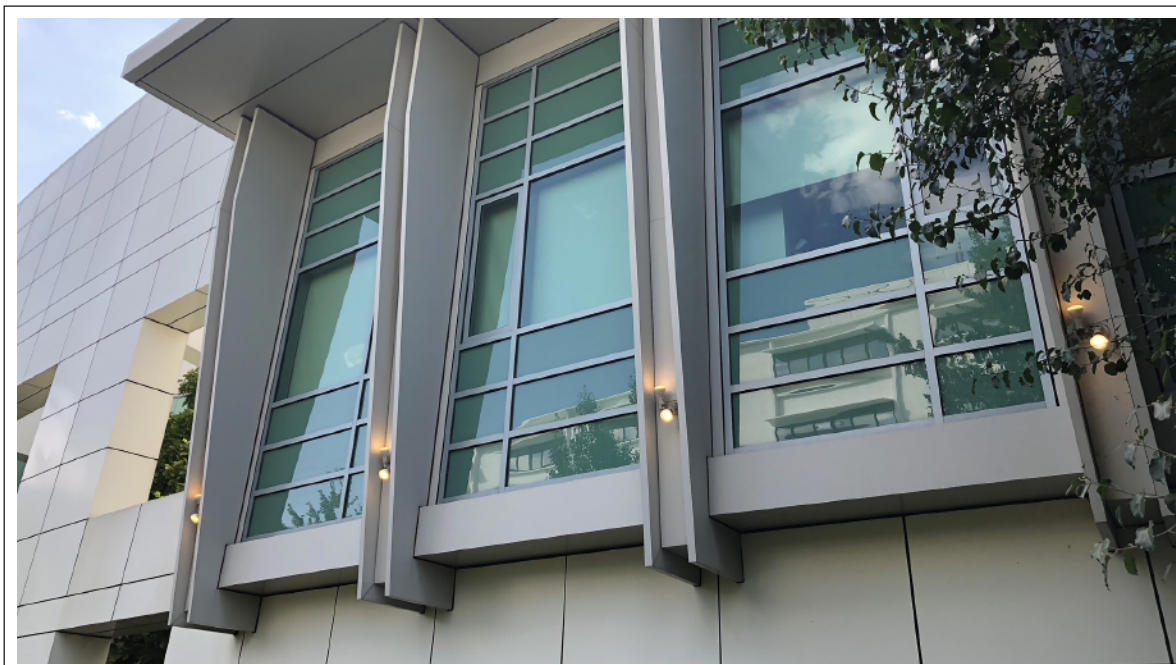


Example of building with multiple material types (glass, brick, and concrete).

Conceptual Vision for the Proposed Development

Exhibit 3-11a

Queen of the Valley Hospital Specific Plan EIR



Variety of window glass sizes.



Example of material uses and articulation along the building facade.

Conceptual Vision for the Proposed Development

Exhibit 3-11b

Queen of the Valley Hospital Specific Plan EIR

development of the Project would be designed to provide access to the regional bike and pedestrian path improvements anticipated for the Walnut Creek Wash. Since the Wash serves as a trail, the Project will provide a minimum of one point of connection between the Wash and the primary entrance of the hospital (refer to Section 5.4.2, *Secondary Development Standards* of the Specific Plan).

Transit Network

Metrolink's San Bernardino Line passenger train service is located to the north just outside of West Covina, in the City of Baldwin Park. Public transit service in the Project vicinity is provided by Foothill Transit and the City of West Covina, operating as Go West Shuttle. The Go West Shuttle service consists of three alignments (Red, Blue, and Green) that serve destinations throughout the city including Plaza West Covina, Eastland Shopping Center, Heights Shopping Center, West Covina Civic Center, West Covina Senior Center, Cameron Community Center (West Covina 2018). Service to the Specific Plan area is provided by Foothill Transit Bus Routes 272 and 281, which have stops adjacent to the Project Site, as shown on Exhibit 3-13, *Transit Network* (refer to Section 3.4, *Transit Network*, of the Specific Plan).

Vehicular Circulation

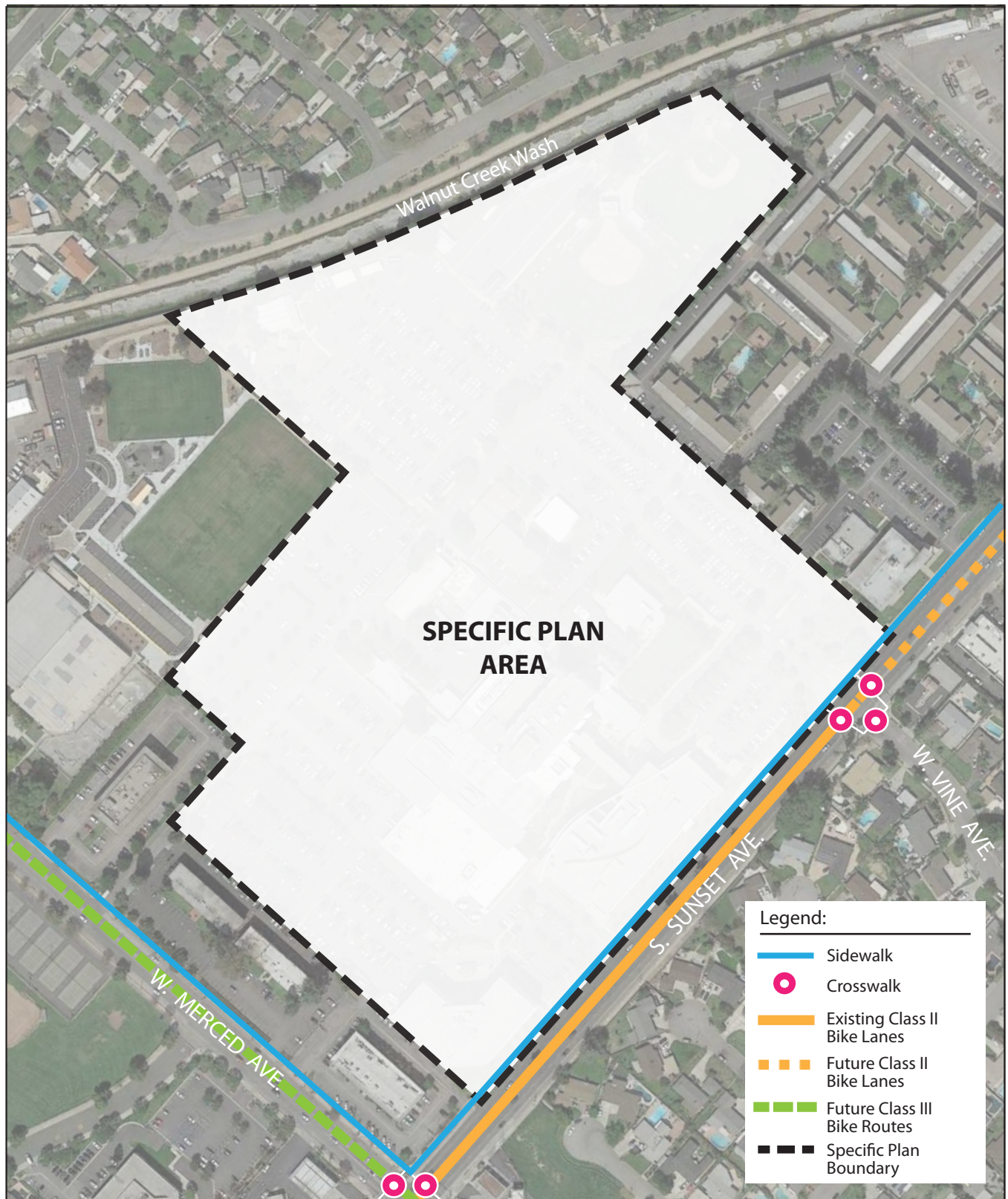
The City of West Covina is situated in the eastern San Gabriel Valley, which is served by several regional freeways and major arterial streets. The I-10 freeway traverses the northern portion of West Covina from east to west, and the State Route (SR)-60 freeway is located less than a mile south of the City's southern limit. The QVH Campus is at the north corner of Sunset Avenue and Merced Avenue, approximately 0.7-mile south of the I-10 Freeway. Sunset Avenue is classified as a Principal Arterial and Merced Avenue is classified as a Minor Arterial, according to the West Covina Master Plan of Streets. Primary access to QVH is provided by South Sunset Avenue from the north and south. The primary access into the site is the signalized intersection along South Sunset Avenue near the northeast corner of the Specific Plan area. Two additional unsignalized ingress/egress points are located along South Sunset Avenue, one is a right-in, right-out, and the other has both left- and right-in, right-out. Ingress/egress also occurs with the abutting parcels to the north and south. Exhibit 3-14, *Vehicular Circulation and Access*, shows the classifications for public streets adjacent to the Specific Plan area (refer to Section 3.5, *Vehicular Circulation*, of the Specific Plan).

Parking

Table 3-5, *Planned Hospital Parking by Phase*, provides the required parking standards for the QVHSP. Additional parking regulations are provided in Section 5.4, *Parking Standards*, of the Specific Plan.

Signage Standards

The Specific Plan includes signage provisions that establish identifiers for the campus; provide wayfinding for employees, visitors, and guests; and maintain consistent quality and appearance of signs throughout the campus. New signage within the campus would be required to be incorporated into a master signage program. Design guidelines and signage standards are provided in Section 4.7, *Signage*, and Section 5.6, *Signage Standards*, of the Specific Plan.



Source: KTG 2019

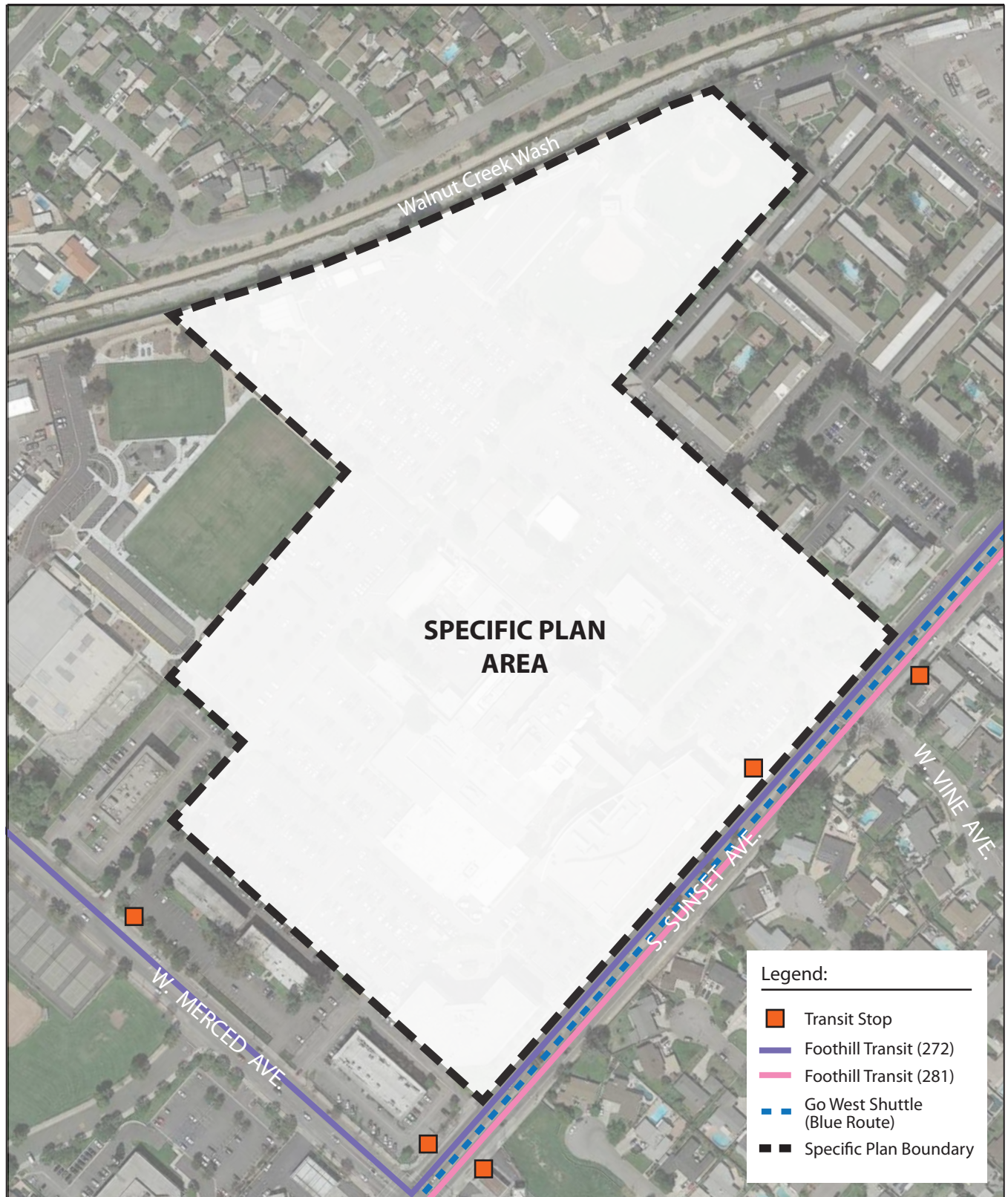
Bicycle and Pedestrian Network of the Specific Plan

Exhibit 3-12

Queen of the Valley Hospital Specific Plan EIR



Map not to scale



Source: KTG 2019

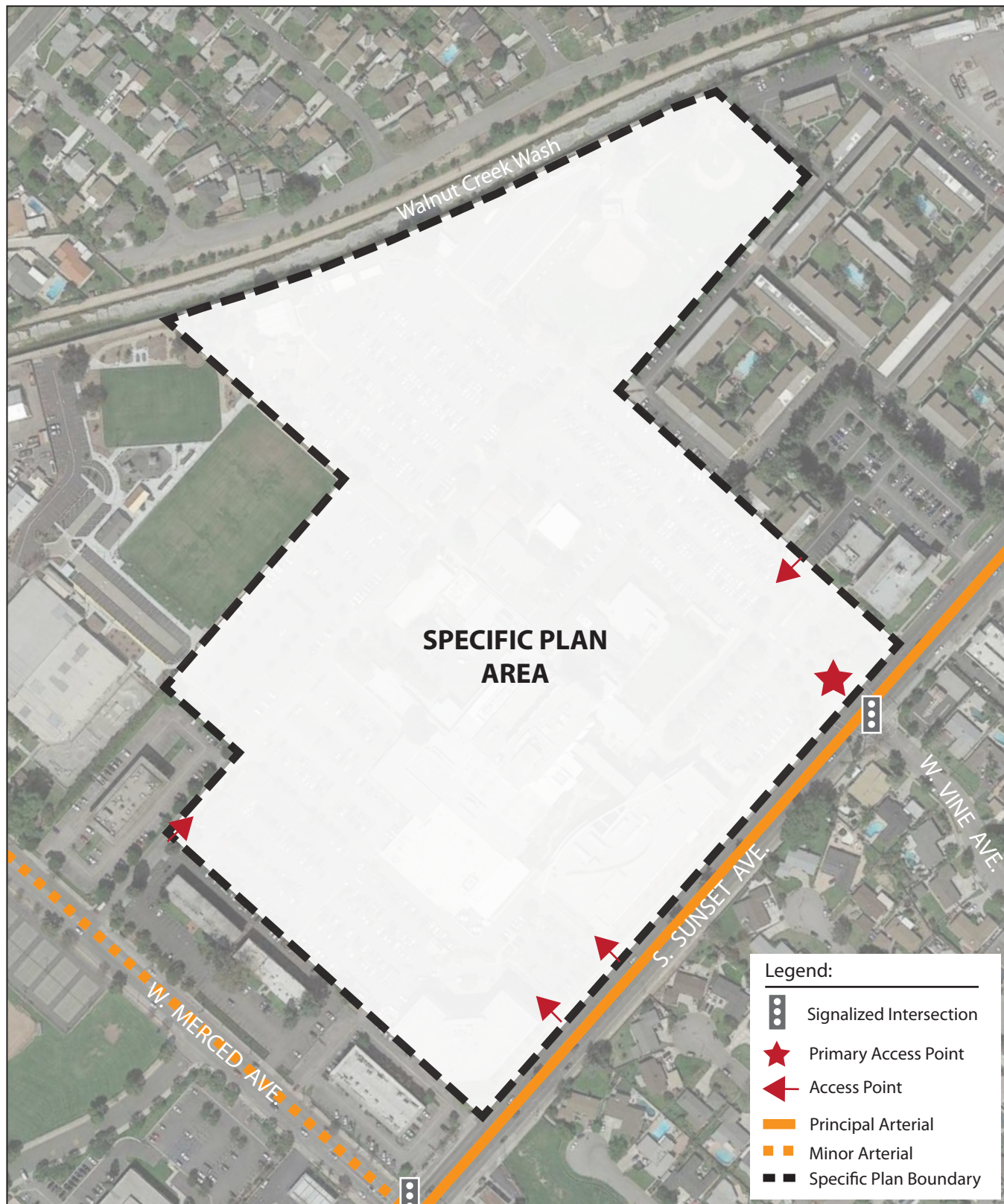
Transit Network

Exhibit 3-13

Queen of the Valley Hospital Specific Plan EIR



Map not to scale



Source: KTG 2019

Vehicular Circulation and Access

Exhibit 3-14

Queen of the Valley Hospital Specific Plan EIR



Map not to scale

3.6.3 FUTURE IMPLEMENTATION

The QVHSP establishes the land use and development standards for the Specific Plan area and includes customized zoning standards and site-specific permitted uses for the site. Future minor (technical or informational) adjustments to the Specific Plan may be processed administratively and approved by the City's Community Development Director (Section 6.2, of the Specific Plan). The revisions considered minor include addition of new information (i.e., maps and/or text) that does not change the effect or intent of any regulation; clarifications; typographical and grammatical errors; revisions to the locations of the infrastructure and/or service providers subject to approval by the regulating agency or jurisdiction.

3.6.4 UTILITIES

The municipal and private utility infrastructure necessary to serve the proposed hospital expansion is currently available within or adjacent to the Project site. On-site utility infrastructure necessary to serve the proposed Project, including water (domestic and recycled), sanitary sewer, drainage, water quality treatment, and dry utilities (e.g., electricity, natural gas, cable, telephone), would connect to the existing utility lines on or adjacent to the Project site. The final sizing and design of onsite facilities would occur during final design. Following is a description of existing and proposed infrastructure.

Domestic and Recycled Water

There are three main public water lines including one 12-inch water main line in Merced Avenue and two 12-inch water main lines in Sunset Avenue serving the area, and each operated and maintained by Suburban Water Systems. The QVH Campus is currently serviced by a 8-inch domestic water line with a source connection from the existing southeasterly 12-inch water line in Sunset Avenue. The 8-inch water line runs northwest through the site approximately 720 feet, turns 90 degrees along the access road and runs southwest approximately 250 feet and connects to the existing central plant. This existing water system is to remain in place to serve the existing hospital buildings. The existing medical office building in the south corner of the site is served by a separate meter and water line that comes off the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building (refer to Exhibit 4.15-1, *Existing and Proposed Water Plan* in Section 4.15, *Utilities and Service Systems*).

The existing domestic water system will remain in place to serve the existing medical office building, hospital buildings, and central plant. The proposed emergency room, intensive care unit, and medical office building will be served by a new domestic water lateral connected to the existing public 12-inch water line in Sunset Avenue. The proposed central plant will be serviced by a new domestic water line that will run from the central plant southwest in the access road and connect to the existing public 12-inch water line in Merced Avenue. Each new domestic water lateral will require a meter as it comes off the public mainline.

Fire Protection Water System

The main fire water system is serviced by an 8-inch fire water line that connects to the existing 12-inch waterline in Sunset Avenue. This water line runs through two double back flow devices at the property line; runs parallel to the domestic water system northwest through the site; turns 90 degrees along the access road; runs southwest for approximately 430 feet, and finally connects to the existing central plant. The southwest side of the hospital is serviced by a 14-inch fire water service from a source connection from the existing 12-inch water line in Merced Avenue. Additionally, there is an 8-inch water line that connects from the existing 12-inch public water line

in Sunset Avenue serving a fire hydrant at the main entrance to the hospital building. The existing medical office building in the south corner of the site is served by a separate fire water line that that connects to the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building (refer to Exhibit 4.15-2, *Existing and Proposed Fire Water Plan* in Section 4.15, *Utilities and Service Systems*).

The existing fire water system will remain in place to serve the existing medical office building, hospital buildings, and central plant. The proposed emergency room, intensive care unit, and medical office building will be served by a new fire water lateral connected to the existing public 12-inch water line in Sunset Avenue. The proposed central plant will be serviced by a new fire water line. This new fire water line will run from the proposed central plant southwest in the access road and connect to the existing public 12-inch water line in Merced Avenue. Each new fire water lateral will require a meter and backflow as it comes off the public mainline.

Sanitary Sewer

The campus is currently serviced by three existing sewer mainlines, which include one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue, serving the area surrounding the QVHSP site, and are operated and maintained by the City of West Covina. The 27-inch public sewer pipe in Sunset Avenue runs southwest and connects to the 33-inch public sewer pipe in Merced Avenue, which carries sewage to the San Jose Creek East Water Reclamation Plant (WRP). The main hospital building is serviced by two 8-inch sewer lines exiting the hospital on the southeast side and joining at the property line into one 10-inch sewer line before connecting to the existing 27-inch public sewer line in Sunset Avenue. The central plant is serviced by a 6-inch sewer line running in the access road approximately 850 feet before connecting to the existing 33-inch public sewer line in Merced Avenue (refer to Exhibit 4.15-3, *Existing and Proposed Sewer Plan* in Section 4.15, *Utilities and Service Systems*).

The existing sewer system will remain in place to serve the existing medical office building and hospital buildings. The proposed emergency room, intensive care unit, and medical office building will be served by a new sewer lateral connecting to the existing 8-inch sewer lateral in the southeast half of the site. The proposed central plant will be serviced by the existing 6-inch lateral in the access road. Both laterals may need to be upsized when demand and capacity calculations are performed.

Drainage and Water Quality Features

There are two main storm drain lines serving the site and surrounding area, which include one 42-inch storm drain main in Sunset Avenue and one 120-inch storm drain main in Merced Avenue, and are operated and maintained by the City of West Covina. The 42-inch public storm drain in Sunset Avenue runs southwest and connects to the 120-inch public storm drain in Merced Avenue that runs northwest and outlets to Walnut Creek Wash. The site contains three drainage areas, the first located on the southeast half of the site with surface flows southeast to Sunset Avenue and collected by the 42-inch public storm drain in Sunset Avenue; the second in the west quadrant of the site with surface flows southwest to Merced Avenue and collected by the 120-inch public storm drain in Merced Avenue; and the third area located in the north quadrant of the site with surface flows southwest to an existing 24-inch storm drain line that runs northwest for approximately 400 feet and outlets to Walnut Creek Wash. In addition, there are several roof drain lines throughout the site varying from 6-inch to 12-inch in size and connecting to a 14-inch roof drain line in the access road, which runs southwest and connects to the existing 120-inch public storm drain pipe in Merced Avenue.

The storm drain system for the proposed Project has been designed to accommodate anticipated on-site and some off-site storm water flows and includes structural and non-structural best management practices (BMPs) to reduce storm water pollution. The conceptual storm drain system is presented in Exhibit 4.15-4, *Existing and Proposed Drainage Plan* in Section 4.15, *Utilities and Service Systems*.

The existing drainage patterns are to remain the same in the proposed condition. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) map number 06037C1700F the site is outside of the 100-year flood plain. The site is in an area of 0.2% annual chance of flood. Structural or Treatment Control Best Management Practices (BMPs) are required for this project under the Standard Urban Storm Water Mitigation Plan (SUSMP) conditions assigned by the City. Volume-based or flow-based design standards may be used separately or in combination. Volume-based criteria are used in the sizing of detention or infiltration structures while flow-based criteria are used on swales, catch basin devices or wetlands. The SUSMP requirements, approved by the Regional Water Quality Control Board, call for the treatment of the peak mitigation flow rate or volume of runoff produced by a 0.75 inch 24-hour rainfall event. Various stormwater treatment facilities are to be provided throughout the site to capture and treat stormwater runoff from the site.

The hydraulic analysis conducted for the proposed project is further discussed in Section 4.8, *Hydrology and Water Quality*, of this Program EIR

Telecommunication Facilities

Telecommunication facilities would meet the minimum requirements identified in Division 16 of Article XII of the West Covina Municipal Code, in addition to regulations in the Specific Plan. As indicated in the Specific Plan, processing of wireless facilities shall be per the West Covina Municipal Code.

3.6.5 GRADING AND CONSTRUCTION ACTIVITIES

Grading

The majority of the QVHSP Project site is developed with impervious surfaces, with the exception of areas of ornamental landscape and the former Sunset Field Park. It is anticipated that grading activities will be minor and generally consist of recompacting existing dirt with little, if any import or exporting of soil. In the event that parking structures (above or below grade) are constructed, some excavations may be necessary to accommodate the caissons and/or underground parking levels, potentially requiring export of dirt off of the Specific Plan Area.

Construction

It is expected that construction of the proposed Project would be initiated in 2019. The Project would be phased based on funding and service needs, but it is estimated that all phases of construction could be completed by 2030. The construction assumptions discussed below and summarized in Table 3-9 are the basis for the analysis of construction impacts presented in this Program EIR.

In addition to the identified construction areas, a staging area is needed to receive, lay down, and prepare materials for use during construction. Construction staging would occur within the Project impact limits and be located away from adjacent residential uses when possible. Additionally, perimeter screening would be installed to obstruct views from adjacent roadways and uses.

Construction of the proposed Project would require standard equipment including, but not limited to, tractors, loaders, backhoes and dozers (refer to Tables 3-9 through 3-11 for an estimate of the equipment to be used during major construction phases). No blasting is anticipated.

**TABLE 3-9
ESTIMATED DAILY CONSTRUCTION EQUIPMENT
(IMMEDIATE IMPROVEMENTS)**

Activity/ Construction Phase ¹	Equipment Type	Quantity	Hours/Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	3	8
Paving	Cement and Mortar Mixers	2	6
	Pavers	1	8
	Paving Equipment	2	6
	Rollers	2	6
	Tractors/Loaders/Backhoes	1	8
Architectural Coating	Air Compressors	1	6
Source: CalEEMod model outputs (Appendix C).			

TABLE 3-10
ESTIMATED DAILY CONSTRUCTION EQUIPMENT (PHASES 1A AND 1B)

Activity/ Construction Phase	Equipment Type	Quantity	Hours/Day
PHASE 1A			
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	8
	Scrapers	2	8
Building Construction	Cranes	1	7
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	7
	Welders	1	7
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	6
PHASE 1B			
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	8
	Scrapers	2	8
Building Construction	Cranes	1	7
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	7
	Welders	1	7
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	6
Source: CalEEMod model outputs (Appendix C)			

**TABLE 3-11
ESTIMATED DAILY CONSTRUCTION EQUIPMENT
(PHASES 2 AND LONG RANGE)**

Activity/ Construction Phase	Equipment Type	Quantity	Hours/Day
PHASE 2			
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	8
	Scrapers	2	8
Building Construction	Cranes	1	7
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	7
	Welders	1	7
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	6
LONG RANGE IMPROVEMENTS			
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	3	8
Building Construction	Cranes	1	7
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	7
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	6
Source: CalEEMod model outputs (Appendix C).			

Temporary Uses During Construction Phasing

During construction, back-of-staff and educational support services would be housed within new modular buildings that would be located in the northern portion of Specific Plan Area boundary (Zone 3), abutting the Walnut Creek Wash. As the Project's future phases (through the 10-year horizon) are implemented, services will be rotated through these modular buildings during construction, as necessary.

3.7 INTENDED USES OF THE EIR

This Program EIR evaluates the environmental impacts of the proposed Project and is prepared to address various actions by the City and others agencies to adopt and implement the proposed QVHSP Project. It is the intent of this Program EIR to inform the City, other agencies, and interested parties public agencies of the potential environmental impacts of the proposed Project, thereby enabling them to make informed decisions with respect to the requested entitlements. The anticipated approvals required for the proposed Project are summarized in Table 3-12. Subsequent non-discretionary actions anticipated to be approved at the staff level, requiring separate processing, would include, but may not be limited to, demolition, grading permits, building permits, street improvement plans, and utility plans.

**TABLE 3-12
ANTICIPATED DISCRETIONARY ACTIONS/APPROVALS**

Lead Agency	Action
City of West Covina	Certification of the QVHSP Project Final Program EIR. The proposed Project requires CEQA compliance through the certification of an EIR prior to approval of the Project.
	Adoption of the QVHSP
	Approval of a General Plan Amendment to change "Parks and Open Space" designation on former Sunset Field to Commercial, consistent with the Specific Plan
	Approval of a Zone Change (ZC 17-02) to change the zoning designation of a portion of the property from the current "MF-20 - Residential 20 du/ac" to "Specific Plan" on the City's Zoning Map.
	Precise Plan of individual developments per Municipal Code 26-226 through 26-236 (PC approval)
Responsible Agencies	Action
Office of Statewide Health Planning and Development (OSHPD)	State Hospital construction plans approval and continuous inspection of construction in progress based on state building code. Licensing of newly constructed hospital space Other healthcare-related construction project approvals based on project type for drug compounding rooms, imaging projects, etc.
California Department of Public Health (CDPH)	
Board of Pharmacy	
County of Los Angeles Public Health (Radiation Management Division)	Applicant must submit a Notice of Intent (NOI) to comply with the General Construction Activity National Pollution Discharge Elimination System (NPDES) Permit.
State Water Resources Control Board	
South Coast Air Quality Management District	

3.8 **REFERENCES**

Blakely, T. 2018 (December). Personal communication. Email between T. Blakely (Facilities Director, Design and Construction, Queen of the Valley Hospital) and K. Norton (Psomas).

KTGY Group, Inc. (KTGY). 2019 (February). *Queen of the Valley Hospital Specific Plan No. 1 (SP-1)*. Irvine, CA: KTGY.

Los Angeles County Assessor's Office (2018). Assessor Parcel Maps. Los Angeles, CA:

Psomas. (2018b). Air Quality and Greenhouse Gas Emission Assessment, Queen of the Valley Hospital Specific Plan Project. December 2018.

_____. (2018a).(November) Traffic Impact Study for Queen of the Valley Hospital Environmental Impact Report/Master Plan (Appendix J).

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SECTION 4.0 ENVIRONMENTAL SETTING AND IMPACT EVALUATION OVERVIEW

4.0.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

Sections 4.1 through 4.15 of this Program Environmental Impact Report (Program EIR) provide analysis of impacts for those environmental topics where it was determined that the proposed Queen of the Valley Hospital Specific Plan (QVHSP or “Project”) could result in “potentially significant impacts,” and/or where further analysis was required as outlined in the Notice of Preparation (NOP) prepared for the proposed Project and included in Appendix A. Each topical section includes the following information:

- A description of relevant policies and regulations
- Methods for document preparation and analysis, as applicable
- A description of the existing environmental setting (an overview of the environmental setting is provided in Section 4.0.2, below)
- Identification of thresholds of significance
- Analysis of potential Project impacts
- Evaluation of potential cumulative impacts
- Identification of any impacts of the recommended mitigation measures (MMs) to reduce the identified Project impacts.
- Identification of the level of significance of impacts after mitigation, including unavoidable significant adverse impacts
- References cited in the respective section

The proposed QVHSP would govern the future development of the entire hospital campus. In addition to the QVHSP, this Program EIR examines “reasonable worst case” assumptions about the ultimate hospital development to assure that the Program EIR addresses all of the potential environmental impacts that could occur as the hospital expands in the future. The Queen of the Valley Hospital (QVH or Hospital) currently occupies 1.09 million square feet of building space on 28.8 acres, and it is anticipated that it would expand up to approximately 1.58 million square feet (plus 4900,000 square feet) in approximately five phases over at least the next 10 years (2019–2028+).

Throughout the Program EIR document the reader should note that the Immediate Improvements (2019) as well as Phase 1 improvements (through 2022) will be evaluated in greater detail (i.e., at a **project level**) as there is more specific information about these short-term improvements to be made in the next 4 years (2019–2022). In contrast, the more long-term improvements in Phase 2 (2022–2026) and Long Range (2028+) will be evaluated on a **programmatic level** in the EIR as there is less specific information about these more conceptual improvements. Future improvements will be evaluated when actual construction is proposed to determine if they were analyzed with a sufficient level of detail when the Program EIR was prepared.

4.0.2 ENVIRONMENTAL SETTING OVERVIEW

In conformance with Section 15125(a) of the California Environmental Quality Act (CEQA) Guidelines, an EIR must include a description of the physical environmental conditions from a local and regional perspective in the vicinity of the project, normally as they exist at the time the

Notice of Preparation (NOP) is published. The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. This section provides a summary overview of the current regional and local setting of the Project. A detailed description of the environmental setting (baseline conditions), as required by CEQA, is provided in Impact Analysis Sections 4.1 through 4.15, which address individual environmental topics.

Regional

Regional Setting

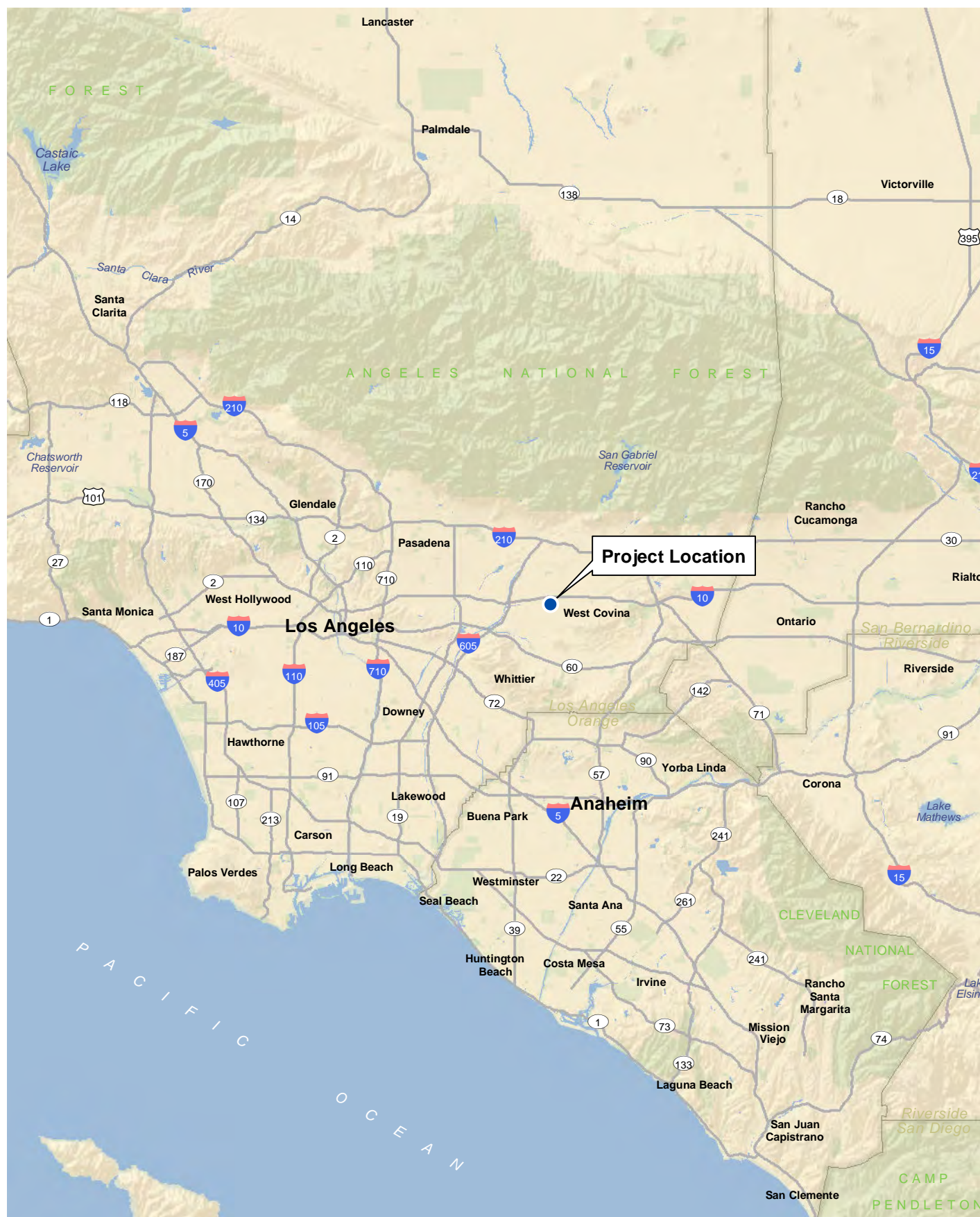
The approximate 28.8-acre Project site is located in the southeastern part of Los Angeles County in the City of West Covina (refer to Exhibit 3-1, Regional and Local Vicinity Map, in Section 3.0, *Project Description*). Los Angeles County, with a land area of 4,084 square miles (County of Los Angeles 2018), is located in the southeastern portion of the State of California. It is bordered by Kern County to the north, Ventura County to the west, San Bernardino County and, Riverside County to the east, and Orange County to the south.

The City of West Covina is located in the greater Los Angeles metropolitan region in eastern Los Angeles County. The City encompasses approximately 16 square miles or 10,240 acres. The City is surrounded by developed municipalities to the north, west, south and east, including the cities of Covina, Baldwin Park, Industry and Walnut, and Census Designated Areas within Los Angeles County including Valinda and Avocado Heights to the east (refer to Exhibit 4-1, *Regional Location*). As shown on Exhibit 4-2, *USGS 7.5-Minute Series Topographic Map for Baldwin Park*., the City's topography is relatively flat. The City is located at the eastern end of the San Gabriel Valley in the middle of the San Gabriel Watershed and framed by the San Gabriel Mountains on the north, the San Rafael Hills on the west, the Puente Hills on the south, and the Chino Hills and San Jose Hills on the east.

Interstate (I)-10 traverses the City and provides interstate access to the area, and I-605 also provides access running a general north-south direction and is located approximately 3.5 miles east of the City boundary. Regional access to the City is provided by State Route (SR) 60, an east-west freeway, which is located approximately 0.5 mile south of the southern portion of the City. Regional access is also provided via SR-57, which travels a general north-south direction located approximately 3.3 miles to east of the City. The Project site is surrounded by regional activity centers in the vicinity, including West Covina City Hall and Plaza West Covina to the north in the City of West Covina; Dwight D. Eisenhower Golf Course to the south in the City of Industry; and Puente Hills Mall and Peter F. Schabarum Regional Park to the southeast in the community of Rowland Heights in unincorporated Los Angeles County.

Regional Planning Context

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for six counties: San Bernardino, Orange, Los Angeles, Riverside, Ventura, and Imperial. The region encompasses a population that exceeds 19 million persons in an area that encompasses more than 38,000 square miles (SCAG 2018). As the designated MPO, the federal government mandates that SCAG research and prepare plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews environmental documents of projects of regional significance for consistency with regional plans. SCAG cooperates with the South Coast Air Quality Management District (SCAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing the regional planning documents to achieve specific regional objectives. Most relevant to the proposed



Regional Location

Queen of the Valley Hospital Specific Plan EIR

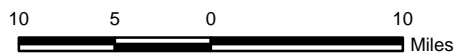
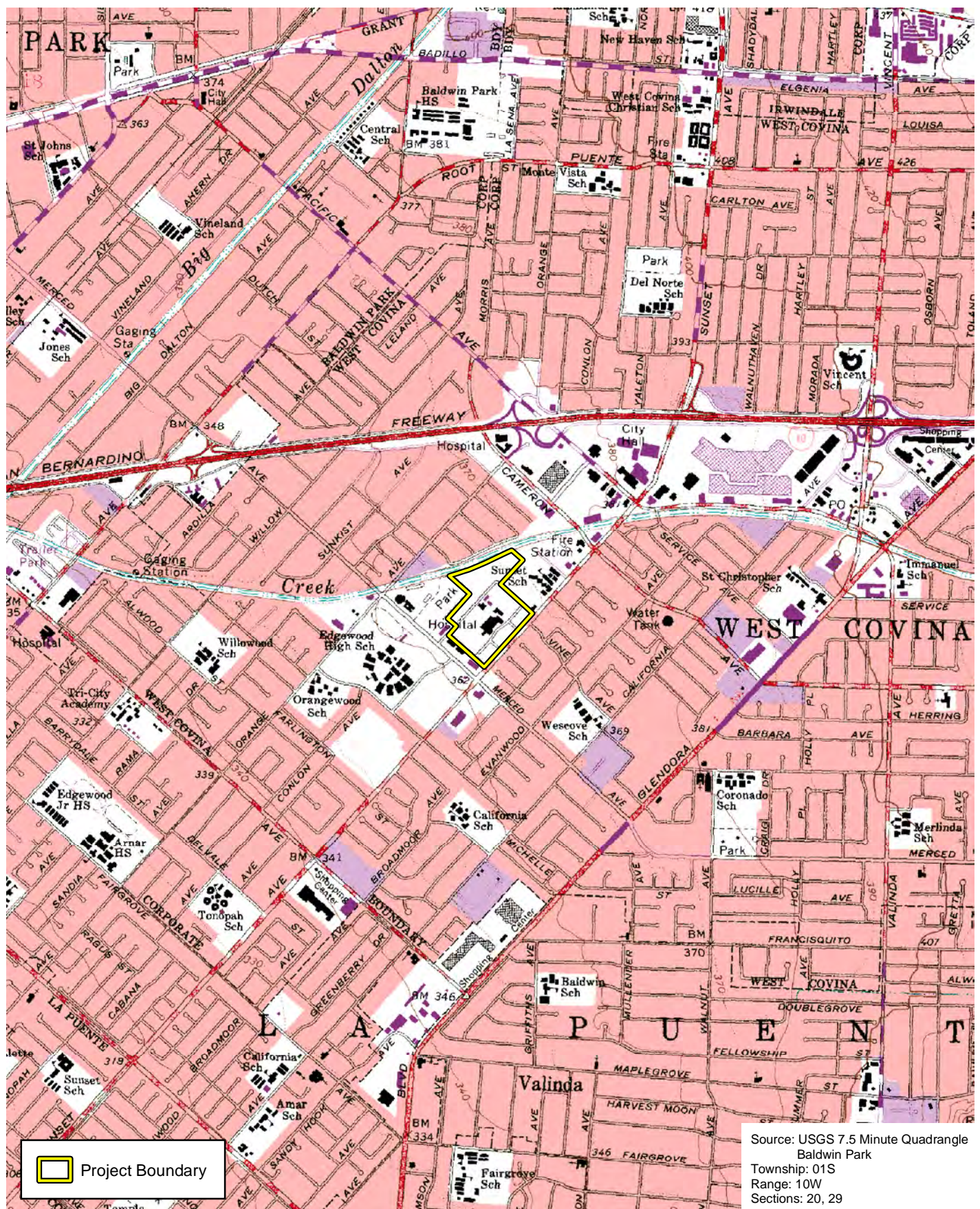


Exhibit 4-1



USGS 7.5-Minute Digital Quadrangle

Queen of the Valley Hospital Specific Plan EIR

Exhibit 4-2



2,000 1,000 0 2,000 Feet

Project, SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on April 7, 2016, includes goals and policies applicable to transportation and land use projects. The proposed Project's consistency with the goals and policies of the 2016 RTP/SCS are discussed in Section 4.9, *Land Use and Planning*. It should be noted the proposed Project is not considered a "project of regional significance" pursuant to Section 15206 of the State CEQA Guidelines.

The City of West Covina is in the South Coast Air Basin (SoCAB), which is managed by the SCAQMD. The SoCAB includes parts of San Bernardino, Los Angeles, and Riverside counties and all of Orange County. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs). An AQMP establishes a program of rules and regulations directed at attaining the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The regional plan applicable to the proposed Project is the SCAQMD's 2016 AQMP, which is discussed in Section 4.2, *Air Quality*, of this Program EIR.

The Project site is not located within the boundary of an Airport Land Use Plan or within two miles of a public airport or public use airport (refer to Section 4.7, *Hazards and Hazardous Materials*).

Local

Location

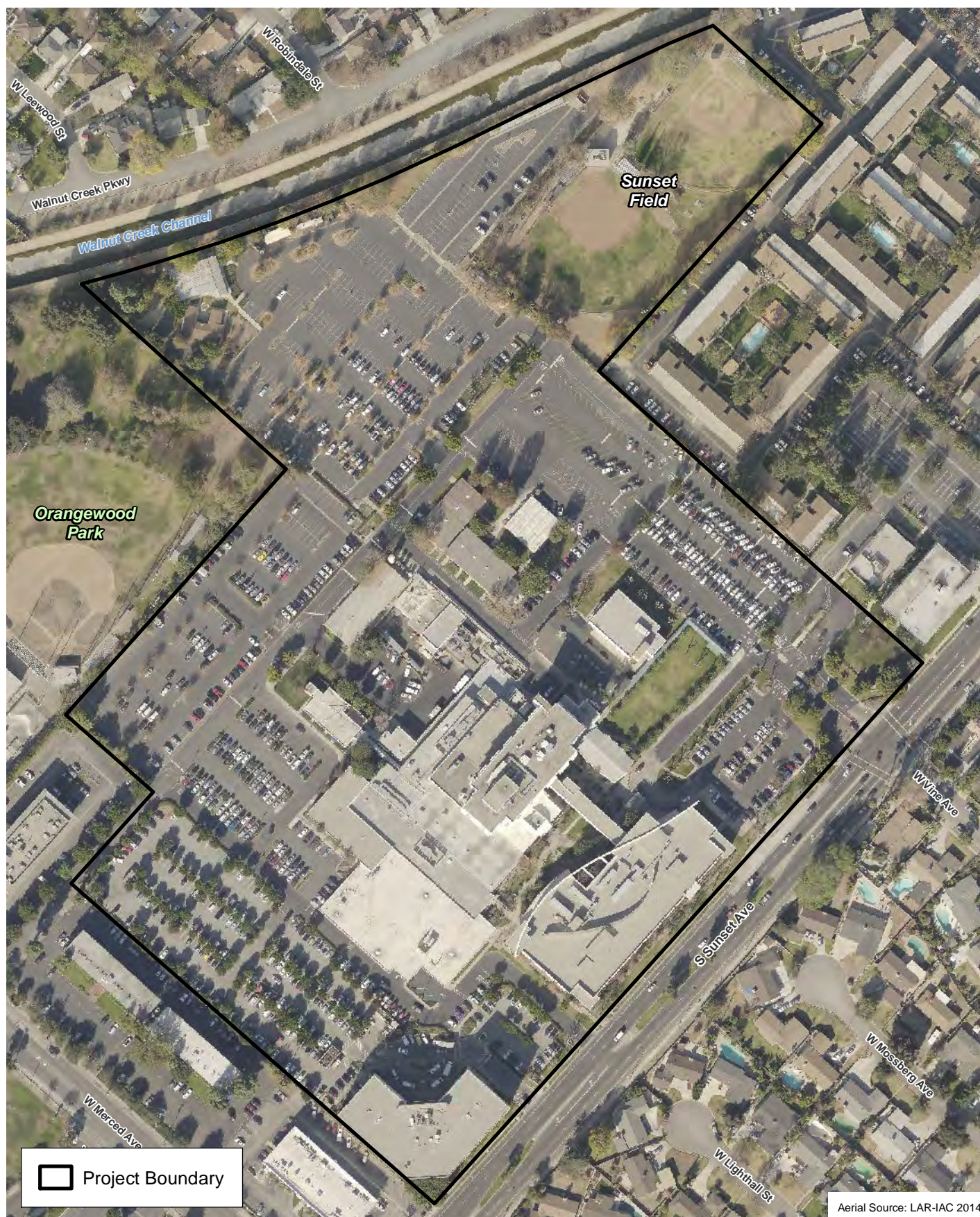
The QVHSP Project site is located at 1135 South Sunset Avenue in the City of West Covina. The property is at the northwest corner of South Sunset Avenue and West Merced Avenue. It is a half mile south of the I-10 Freeway in the east-central portion of the San Gabriel Valley. The site is located at 34° 3' 50" North latitude and 117° 56' 43" West longitude and within Section 20 of Township 1 South Range 10 West in West Covina. The property is in the *Baldwin Park* (1972) (refer to Exhibit 4-2, *USGS 7.5-Minute Series Topographic Map for Baldwin Park*)

Onsite and Surrounding Land Uses

The Project site is currently developed with the Queen of Valley Hospital, founded in 1962, located on an approximately 28.8-acre site at 1115 South Sunset Avenue, in the City of West Covina. The privately owned hospital is open to the public and provides patient care on a daily basis (365 days per year). The existing facilities at the Hospital include a Primary Stroke Center, a Family Birth and Newborn Center, a Level IIIB Newborn Intensive Care Unit (ICU), da Vinci Robotic Surgery, and Inpatient and Outpatient Rehabilitation services for adults and children. Existing services are housed in approximately 160,000 square feet (sf) of various single- and multi-level structures. Surface parking is currently provided throughout the site. The Hospital currently provides approximately 1,687 jobs (Blakely 2018).

To meet the growing critical care needs of the community, Citrus Valley Health Partners (Project Applicant) is planning a major expansion and renovation of the Hospital. To accomplish this expansion, the Project Applicant plans to purchase the approximately 2.85-acre City-owned property northeast of the hospital (the former Sunset Field Park). As shown on the aerial photograph provided on Exhibit 4-3, *Aerial Photograph*, the hospital is surrounded by various land uses, including primarily single- and multi-family residential, park and recreation, and medical office uses.

D:\Projects\3\WCO010100\MXD\EIR\ex_Aerial_20190111.mxd



Aerial Photograph

Exhibit 4-3

Queen of the Valley Hospital Specific Plan EIR



200 100 0 200
Feet

The existing hospital site has a General Plan land use designation of Commercial and is zoned Specific Plan. The City-owned property has a land use designation of Parks and Open Space and is zoned MF-20 – Residential (20 du/ac). The uses to the north are designated Park and Open Space, Commercial and Neighborhood Low and zoned O-S, Open Space, R-A, Residential Agriculture, and R-1, Residential Single-Family. The uses to the east including the City-owned property are designated Neighborhood Medium, Parks and Open Space, and Commercial and zoned MF-20 – Residential 20 du/ac, and O-P, Office Professional. The uses to the south are designated Neighborhood Low and zoned R-1, Residential Single-Family and uses to the west are designated Commercial and zoned NC, Neighborhood Commercial, and O-P, Office Professional.

Environmental Resources and Infrastructure

Aesthetic Character

West Covina is located in a relatively flat valley bounded by the San Gabriel Mountains on the north, the San Rafael Hills on the west, the Puente Hills on the south, and the Chino Hills and San Jose Hills on the east. These mountains provide background mountain scenic views within the City depending on location and orientation. The City is nearly built out but various locations in the City have views of the San Gabriel Mountains to the north and to a lesser degree the San Jose Hills to the southwest. There are no designated scenic highways as defined by Caltrans within the City (General Plan EIR, Section 4.1, *Aesthetics*). The main Hospital building represents one of the taller buildings within the City, although the freeway corridor also contains taller buildings.

Given the City's surrounding hillside and mountain views, new non-residential development has the potential to affect views of scenic vistas from various locations in the City. The areas with the focus for the most development (i.e., downtown and certain districts, corridors, and neighborhood centers) have the most potential for new or more intensive development with increased building heights that may block views of scenic vistas. The existing West Covina Municipal Code has only established review of scenic vistas for residential development. Future non-residential development projects would undergo environmental and design review on a project-by-project basis to identify and address impacts to scenic vistas at the project level. However, there is no policy in the PlanWC that requires protection of public views within the City.

Air Quality and Greenhouse Gas Emissions

The City of West Covina is located in the eastern portion of the San Gabriel Valley, which is part of the larger Los Angeles metropolitan region. The Mediterranean climate of the region and the influence of the nearby Pacific Ocean produce moderate annual temperatures with rainfall (averaging 16 inches) concentrated in the winter months. The Los Angeles Basin, including West Covina, is in the South Coast Air Basin (SoCAB) and the regional climate is considered semi-arid, characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The SoCAB is arid, with virtually no rainfall and abundant sunshine during the summer months. It has light winds and poor vertical mixing compared to the other large urban areas in the U.S. The combination of poor dispersion and abundant sunshine provides conditions especially favorable to the formation of smog.

The SoCAB is a nonattainment area for respirable particulate matter with a diameter of 10 microns or less (PM₁₀) (State), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}) (State and Federal), and ozone (O₃) (State and Federal) (see Section 4.2, *Air Quality*). There are no attainment designations for greenhouse gases (GHG) because GHG is a global, not regional or local pollutant (refer to Section 4.6, *Greenhouse Gas Emissions*).

Operation of the Hospital currently generates air pollutant and GHG emissions from a variety of sources such as the vehicle trips generated by the employees, patients, visitors, natural gas used for heating and hot water, landscape and hospital building maintenance equipment, and consumer products.

Biological Resources

As discussed in Section 4.3, *Biological Resources*, the general environs of the City of West Covina (i.e., the San Gabriel Valley) once comprised sprawling native grasslands that connected to the San Gabriel Mountains to the north and the Puente Hills to the east. While the local mountains still support extensive native vegetation and habitat for native animals, the City itself and surrounding communities are largely urbanized with only isolated areas that support remnant native vegetation. The QVH site and the Sunset Park property are fully developed and contain no native vegetation or habitat (General Plan EIR Figure 4.3-1, *Vegetation Communities*).

The only source of water in the area, other than landscaping irrigation, is the fully improved Walnut Creek (flood control) Channel just north of the QVH site. The hospital property and former City park site contain dozens of large trees and landscaped areas, mainly turf. However, onsite vegetation is either introduced or weedy species that provide minimal habitat for native animals except for songbirds and small mammals tolerate of human activity (e.g., ground squirrels). It is possible onsite trees and large shrubs may provide some nesting or roosting opportunities for migratory birds or raptors. In its present condition the QVH site provides minimal support for sensitive or important biological resources within the City (General Plan EIR Figure 4.3-2, *Special Status Species*).

Cultural Resources

The San Gabriel Valley was inhabited by Gabrielino/Tongva Native Americans prior to European settlement. The Spanish arrived in the early 16th century and Franciscan monks of Spain established the San Gabriel Mission in 1771 with the entire San Gabriel Valley supporting their estate. In 1810, Mexico claimed independence from Spain and took over the land. Between 1842 and 1900, West Covina's economy focused on raising cattle but slowly transitioned into agricultural crops such as pumpkins, beans, alfalfa, wheat, and potatoes as engineered systems made water delivery more reliable. The walnut industry began in the City by 1904, which continued until the 1940's when the tress began to die due a pest infestation. The region's walnut packing plant closed in 1948 and local residents switched to growing citrus, vegetables, and flowers. By the end of World War II, the Southern California region was urbanizing and local farming in the City began to decline as land owners sold their land for residential and commercial development. Suburbanization continued through the rest of the 20th century, and the City is now essentially built out. These issues are discussed further in Section 4.4, *Cultural Resources*.

Geology and Soils

The topography of the City is characterized primarily by relatively flat alluvial plains in the northwest and steeper slopes associated with the San Jose Hills in the southeast. Elevations in the City range from approximately 320 feet above mean sea level (amsl) in the lowlands to

approximately 1,280 feet amsl in the hills. The Hospital property is relatively flat with onsite elevations ranging from 359 feet amsl in the eastern and northeastern portion of the site down to 352 feet amsl along the western portions of the site closest to Merced Avenue. The average elevation on the hospital property is approximately 357 feet amsl with a gentle slope of 0.4 percent down in the southwest direction.

The Project site is located near the northern end of the Peninsular Ranges Geomorphic Province, which abuts to the north against a series of east-west-trending mountain ranges collectively referred to as “the Transverse Ranges”. The Project site is located approximately six miles south of the base of the San Gabriel Mountains, which make up the central portion of the Transverse Ranges. The erosion of mountains in the Transverse Ranges have deposited a thick blanket of geologically recent, coarse-grained, alluvial sediments (e.g., deposited by running water).

The geology of Southern California formed as a result of complex plate tectonics and seismic faults. The most notable fault in Southern California, the San Andreas Fault, is a transform fault that marks the boundary between the Pacific and the North American tectonic plates. Numerous earthquake faults in the Los Angeles area are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during Holocene time (during the last 11,000 years), and there are several active faults in the surrounding region. The most significant fault zone in the Project area is the San Andreas Fault, but other important faults in the area include the Sierra Madre, Whittier-Elsinore, San Gabriel, Verdugo, Santa Monica-Raymond, Newport-Inglewood, San Jacinto, Puente Hills, Indian Hill, San Jose, and Walnut Creek. The closest fault to the Hospital site is the Walnut Creek Fault, which is potentially active and located 1.5 miles to the southeast (General Plan EIR Figure 4.5-1, *Local Faults*). Although the Project area does not have a high potential for ground rupture from earthquakes, the region has and will continue to experience moderate to high levels of groundshaking, which can induce secondary seismic risks such as settlement, lateral spreading, subsidence, or liquefaction where shallow groundwater underlies loose sandy soils. No landslide or liquefaction zones are located near the Hospital property (General Plan EIR Figure 4.5-2, *Landslide and Liquefaction Zones*).

Most of the City is urbanized and the majority of the land surface is covered in structures and pavement, which limits the extent of exposed surface soils. The majority of underlying soils are deep deposits of sandy gravel, sandy silt, sandy clay, silty clay, and clay. Soils in the Project area are generally sandy silt and silty clay transitioning to silty clay and clay. Soils exposed by grading can be subject to erosion by water or wind, and some local soils have high clay content and thus a potential for shrink/swell risks.

As with all of Southern California, the Project site is within a seismically active region. However, there are no major or active faults mapped at the site that could result in surface rupture, nor is the site located in an Alquist-Priolo Fault Rupture Hazard Zone. In the Project area, groundwater depths are 100 feet or more below the ground surface. The Project site has low potential for liquefaction and settlement, and no potential for landslides. These issues are addressed in Section 4.5, *Geology and Soils*.

Hazards and Hazardous Materials

As further discussed in Section 4.7, *Hazards and Hazardous Materials*, of this Program EIR, the region is subject to various natural hazards, including wildfires. The City in general and the surrounding communities are primarily urban with limited natural areas remaining in the San Jose Hills to the east and the San Gabriel Mountains further to the north.

The Project site has supported a functioning community hospital and supporting uses since 1962. Daily operations and maintenance activities at the hospital involve the use of chemicals, drugs, and other substances, many of which are classified as hazardous materials (e.g., flammable, toxic, and explosive.). However, these materials are stored and handled according to various federal and state hazmat regulations, and activities at the hospital are regularly inspected by hospital regulatory agencies and the County Fire Department. Two summary state databases (Envirostor and Geotracker) were consulted regarding recorded incidents involving hazardous materials on the hospital site or in the surrounding area (within a one-mile radius). The search revealed four past hazmat incidents in the area, which are summarized in Table 4.7.A. The databases revealed three historical incidents involving leaking underground storage tanks (LUSTs), but all the cases were closed or eligible for closure. The fourth site is a mile from the hospital property and does not appear to involve a documented accidental release of hazardous materials. In addition, it involves a type of business (office-investments) that does not typically result in LUST events or other substantial hazmat releases.

The QVHSP Project site is not within an identified wildland fire zone or airport land use plan (ALUP).

Hydrology and Water Quality

Due to its relatively flat topography, runoff in the City typically forms as sheet flow that is then intercepted by stormwater conveyance systems. Major drainages in the area such as the San Gabriel River flow to the southwest and eventually drain to the Pacific Ocean. There are five major drainages within the City including Big Dalton Wash, Charter Oak Creek, Puente Creek, Vine Creek, and Walnut Creek (General Plan EIR Figure 4.8-1, *Major Drainages*). The Walnut Creek (flood control) Channel runs east to west through the middle of the City, south of and roughly parallel to Interstate 10 (I-10). This channel is just north of the Hospital property and flows west into the San Gabriel River approximately two miles west of the City. According to the Federal Emergency Management Agency, most of the City would be subject to flooding from a 500-year storm, but only a few small areas, not including the Hospital property, would be subject to flooding from a 100-year storm (General Plan EIR Figure 4.8-3, *Flood Hazard Zones*). Surface water quality in the City is governed by the Los Angeles Regional Water Quality Control Board (RWQCB), which sets water quality standards in the Water Quality Control Plan for the Los Angeles Region. Common sources of stormwater pollution in the City include litter, trash, pet waste, paint residue, organic material (yard waste), fertilizers, pesticides, sediments, construction debris, metals from automobile brake pad dust, air pollutants that settle on the ground or attach to rainwater, cooking grease, illegally dumped motor oil, and other harmful fluids.

West Covina is underlain by the San Gabriel Valley Groundwater Basin, which consists of water-bearing sediments that underlie most of the San Gabriel Valley and a portion of the upper Santa Ana Valley. Concerns about the sustainability of groundwater supply in the basin led to the adjudication of water rights and the establishment of a Main San Gabriel Basin Watermaster in 1973. The Basin Watermaster currently estimates the amount of water in storage at 7.45 million acre-feet and has attributed recent declines compared to historic levels to the effects of the current drought. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies. The Basin contains several contaminant plumes including nitrates, volatile organic compounds, and perchlorate from past industrial processes. Cleanup of these contaminants continues today. Despite their presence, the overall groundwater quality of the Basin for potable use is high. Water-related issues are addressed in Section 4.8, *Hydrology and Water Quality*.

Land Use and Planning

The existing hospital site has a General Plan land use designation of Commercial and is zoned Specific Plan. The former City-owned (Sunset Field) property has a land use designation of Parks and Open Space and is zoned MF-20 – Residential (20 du/ac). The uses to the north are designated Park and Open Space, Commercial and Neighborhood Low and zoned O-S, Open Space, R-A, Residential Agriculture and R-1, Residential Single-Family. The uses to the east including the City-owned property are designated Neighborhood Medium, Parks and Open Space, and Commercial and zoned MF-20 – Residential 20 du/ac and O-P, Office Professional. The uses to the south are designated Neighborhood Low and zoned R-1, Residential Single-Family and uses to the west are designated Commercial and zoned N-C, Neighborhood Commercial, and O-P, Office Professional (refer to Exhibits 4.9-2, *General Plan Designations* and 4.9-3, *Zoning Designation* in Section 4.9, Land Use). The City of West Covina adopted the *West Covina General Plan* and certified the *West Covina 2016 General Plan Update Final Environmental Impact Report* (General Plan EIR) in December of 2016.

As shown on the aerial photograph presented in Exhibit 4-3, *Aerial Photograph*, this area is defined by a mix of land uses, including primarily single- and multi-family residential uses, park and recreation uses, and medical office uses. The former Sunset Field park is located adjacent to the northern portion of the Queen of the Valley campus. High-density multi-family developments (primarily two stories) are found north of the Project site along the westside of Sunset Avenue and are located adjacent to the northeast portion of the site. Commercial and medical offices are also located adjacent to the northeast portion of the site along Sunset Avenue and located above Vine Avenue across Sunset Avenue, northeast of the Project site. Single-Family Residential uses are located to the east of the Project site located across Sunset Avenue, to the north and south of Vine Avenue. Commercial and medical offices are also located south of the Project site along Sunset Avenue and along Merced Avenue. Additionally, Orangewood Park, which includes Orangewood Roller Hockey Park and West Covina Skate Park, is located to the west of the Project site adjacent to the western portion of the Queen of the Valley campus just south of the Walnut Creek Wash.

Noise

As further discussed in Section 4.10, *Noise*, the primary noise in the Project area is vehicular traffic along both Sunset Avenue to the southeast and Merced Avenue to the southwest.

The predominant source of noise in West Covina, as in most communities, is motor vehicles on roadways within the City. The roadways with the highest traffic volumes (such as the I-10 and major arterial roadways such as Azusa Avenue, Sunset Avenue, Valinda Avenue, and Glendora Avenue) produce the highest noise levels (West Covina 2016b).

Two rail lines are located just outside the City of West Covina (the San Bernardino Metrolink line to the north and a freight line to the south); however, no major rail lines are located within the City limits, and noise from these rail lines is not a major source of noise within the City. In addition, no airports are located within or immediately adjacent to West Covina, and aircraft noise is not a major noise source. The nearest airport is El Monte airport, located eight miles to the west. Further, West Covina does not have major “point sources” of noise, such as large factories (West Covina 2016b).

The Project site itself is considered a sensitive receptor because it is a hospital. The closest offsite noise-sensitive receptors are multi-family residential buildings adjacent to eastern boundary of the Project site (located west of Sunset Avenue) and single-family residential to the east and

southeast across Sunset Avenue. Other sensitive receptors in the surrounding area include single family residential uses to the north across the Walnut Creek Flood Control Channel, Orangewood Park to the northwest, and Edgewood school across Merced Avenue to the west.

Land uses adjacent to the Project site's northern, western, and southern boundaries are commercial and light industrial uses, which are not noise-sensitive.

Public Services and Recreation

The Project site is located in a highly urbanized area of the City with public services available to the site. The City provides park/recreation services to the Project site, while library services are provided by the County of Los Angeles. As discussed in Section 4.12, *Public Services and Recreation*, Fire protection services for the City of West Covina, including the Project site, are provided by the West Covina Fire Department (WCFD). The WCFD provides fire protection services and emergency response services to medical emergencies and hazardous materials spills within the City of West Covina. The Fire Department serves the City through five stations located throughout the City. Station No. 1 is located at 819 South Sunset Avenue; Station No. 2 is located at 2441 East Cortez Street; Station No. 3 is located at 1433 Puente Avenue; Station No. 4 is located at 1815 S. Azusa Avenue; and Station No. 5, located at 2650 East Shadow Oak Drive (West Covina 2016a).

Police protection in the City of West Covina is provided by the West Covina Police Department (WCPD). The WCPD provides a full range of police services within two Divisions: the Patrol Division and the Investigative & Support Services Division (ISSD). The Police Department headquarters are located in the West Covina City Hall at 1444 West Garvey Avenue. The City is broken into four Service Areas serviced by WCPD. The Project site is located within the WCPD Service Area 3, (Central).

Public educational services within the City of West Covina are provided by the West Covina Unified School District (WCUSD), Covina-Valley Unified School District (CVUSD), and Rowland Unified School District (RUSD), as well as other districts at least partially within West Covina, including Hacienda La Puente School District (HLPD), Walnut Valley School District (WVSD), and Baldwin Park School District (BPSD).

Public library services within the City are provided by the Los Angeles County Public Library system. The West Covina Public Library is located at 1601 West Covina Parkway and provides study rooms, a meeting room, public computers and access to the Los Angeles County book collection and online resources. In addition, the library provides children and teen services, including homework help and a Family Center in its 42,345 square-foot facility.

The City of West Covina contains a range of park types that include two small pocket parkettes, eight neighborhood parks, three community parks, two wilderness areas, specialized sports facilities, paseos, and two conservation areas. Based on the City's 499 total acres of parks and open space, and the City's 2016 population of 107,873, West Covina has approximately 4.63 acres of park space per 1,000 residents as of 2016 (West Covina 2016b).

Transportation/Traffic

As described in Section 4.13, *Transportation/Traffic*, the City is situated in the eastern San Gabriel Valley, which is served by a number of regional freeways and major arterial streets. The I-10 freeway traverses the northern portion of West Covina from east to west, and the State Route 60 (SR-60) freeway is located less than a mile south of the City's southern limit. Two rail lines are

located just outside City limits that carry both Metrolink San Bernardino line trains and freight trains connecting the Los Angeles area to the west with Riverside and San Bernardino to the east and the Metrolink Riverside Line connecting L.A. Union Station to Downtown Riverside.

In the vicinity of the Hospital property, streets are organized in a grid pattern oriented on a diagonal rather than the typical north-south orientation. The hospital property is at the north corner of Sunset Avenue and Merced Avenue, approximately 0.7-mile south of the I-10 Freeway. Sunset Avenue is classified as a Principal Arterial (80 feet curb-to-curb width) within a 100-foot right-of-way (ROW). Merced Avenue is classified as a minor arterial (60 feet curb-to-curb width) within a 80-foot ROW (West Covina Master Plan of Streets, 2018). Sunset Avenue and Merced Avenue are listed as Intersection 12 on Table 4.14-2, *Existing Level of Service Major Intersections Downtown*, in the City General Plan EIR. As of 2015 this intersection had a Level of Service (LOS) C in the AM Peak Hour and LOS D in the PM peak hour. In addition, Sunset Avenue near the hospital carries approximately 18,000 vehicles per day (Table 4.4, *Traffic Volumes-Downtown*, General Plan Circulation Element).

The Project site is bordered by Sunset Avenue to the southeast, Merced Avenue to the southwest, and Walnut Creek Wash to the north. The main entrance to the Project site is through a driveway on Sunset Avenue approximately 1,200 feet northeast of Merced Avenue. There are three secondary entrances to the site. Two secondary entrances are via two driveways on Sunset Avenue approximately 450 feet northeast of Merced Avenue. The southwest driveway primarily serves the medical office building in the south corner of the site, and the northeast driveway primarily serves the emergency room. The final access to the site is by way of a minor access road at the back of the hospital. The road begins at Merced Avenue, approximately 750 feet northwest of Sunset Avenue, and continues northeast, parallel to Sunset Avenue, for 1,300 feet where the road dead ends at the north east property line.

Transit service is provided to the City by Foothill Transit including two bus lines (Routes 272 and 281) with stops adjacent to the Hospital property. There is also a bus service hub at the Plaza West Covina just northeast of the Hospital site. Local streets have sidewalks to facilitate pedestrian access, and Sunset Avenue has a Class II bike lane.

Senate Bill (SB) 743 (Steinberg, 2013) requires a new process for analyzing transportation impacts under the California Environmental Quality Act (CEQA). Traditionally, traffic studies and CEQA documents have used the LOS on local streets and freeways to determine if projects had significant traffic impacts. SB 743 mandates the use of Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. Once the State Office of Planning and Research (OPR) issues formal guidance, traffic delay as measured by LOS and other similar metrics would no longer constitute a significant environmental effect under CEQA.

Utilities and Service Systems

As further discussed in Section 4.15, *Utilities and Service Systems*, the following conditions exist regarding the various utilities that serve the Project area.

Domestic Water. There are three main public water lines (i.e., one 33-inch water main line in Merced Avenue and two 12-inch water main lines in Sunset Avenue) serving the area, each operated and maintained by Suburban Water Systems. Additionally, there is an existing 12-inch water line originating at the existing 12-inch water line in Merced and running through the access road approximately 450 feet. The campus is currently serviced by an 8-inch domestic water line with a source connection from the existing southeasterly 12-inch water line in Sunset Avenue. The 8-inch water line runs northwest through the site approximately 720 feet, turns 90 degrees

along the access road and runs southwest approximately 250 feet and connects to the existing central plant. This existing water system is to remain in place to serve the existing hospital buildings.

The existing medical office building in the south corner of the site is served by a separate meter and water line that comes off the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building. This service will remain in place. The proposed emergency room, intensive care unit, and medical office building will be served by a new domestic water lateral connected to the existing public 12-inch water line in Sunset Avenue. The proposed central plant will be serviced by a new domestic water line that will run from the central plant southwest in the access road and connect to the existing public 12-inch water line in Merced Avenue. Each new domestic water lateral will require a meter as it comes off the public mainline.

Fire Protection Water System. The pipe sizes for the onsite fire water systems vary from 6-inch to 10-inch diameter. The main fire water system is serviced by a 10-inch fire water line that connects to the existing 12-inch waterline in Sunset Avenue. This water line runs through two double back flow devices at the property line; runs parallel to the domestic water system northwest through the site; turns 90 degrees along the access road; runs southwest for approximately 430 feet, and finally connects to the existing central plant. The southwest side of the hospital is serviced by a 4-inch fire water service coming off the existing public 12-inch water line in the access road. Additionally, there is a 6-inch fire water line coming off the existing 12-inch public water line in Sunset Avenue serving a fire hydrant at the main entrance to the hospital building. These existing fire water systems are to remain in place to serve the existing hospital buildings.

The existing medical office building in the south corner of the site is served by a separate fire water line that comes off the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building. This service will remain in place. The proposed emergency room, intensive care unit, and medical office building will be served by a new fire water lateral connected to the existing public 12-inch water line in Sunset Avenue. The proposed central plant will be serviced by a new fire water line. This new fire water line will run from the proposed central plant southwest in the access road and connect to the existing public 12-inch water line in Merced Avenue. Each new fire water lateral will require a meter and backflow as it comes off the public mainline.

Sewer System. There are two main public sewer lines (i.e., one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue) serving the area around the site, operated and maintained by the City of West Covina. The 27-inch public sewer pipe in Sunset Avenue runs southwest and connects to the 33-inch public sewer pipe in Merced Avenue, which eventually carries the sewage to the San Jose Creek East Water Reclamation Plant (WRP) adjacent to the City of Whittier. The campus is currently serviced by three existing sewer mainlines. The main hospital building is serviced by two 8-inch sewer lines exiting the hospital on the southeast side and joining at the property line into one 10-inch sewer line before connecting to the existing 27-inch public sewer line in Sunset Avenue. The central plant is serviced by a 6-inch sewer line running in the access road approximately 850 feet before connecting to the existing 33-inch public sewer line in Merced Avenue.

The existing sewer system will remain in place to serve the existing medical office building and hospital buildings. The proposed emergency room, intensive care unit, and medical office building will be served by a new sewer lateral connecting to the existing 8-inch sewer lateral in the southeast half of the site. The proposed central plant will be serviced by the existing 6-inch lateral in the access road. Both laterals may need to be upsized when demand and capacity calculations are performed.

Storm Drainage. There are two main storm drain lines (i.e., one 42-inch storm drain main in Sunset Avenue and one 120-inch storm drain main in Merced Avenue) servicing the area around the site, operated and maintained by the City of West Covina. The 42-inch public storm drain pipe in Sunset Avenue runs southwest and connects to the 120-inch public storm drain pipe in Merced Avenue that runs northwest and outlets to Walnut Creek Wash. The site, generally, has three drainage areas. The first drainage area, approximately 11.2 acres, in the southeast half of the site surface flows southeast to Sunset Avenue where it is collected by the 42-inch public storm drain pipe in Sunset Avenue. The second drainage area, approximately 6.5 acres, in the west quadrant of the site surface flows southwest to Merced Avenue where it is collected by the 120-inch public storm drain pipe in Merced Avenue. The third drainage area, approximately 8.3 acres, in the north quadrant of the site surface flows southwest to an existing 24-inch storm drain line that runs northwest for approximately 400 feet and outlets to Walnut Creek Wash. Additionally, there are several roof drain lines throughout the site varying in size from 6-inch to 12-inch. All roof drain lines connect to a 14-inch roof drain line in the access road, which runs southwest and connects to the existing 120-inch public storm drain pipe in Merced Avenue.

The existing drainage patterns are to remain the same in the proposed condition. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) map number 06037C1700F the site is outside of the 100-year flood plain. The site is in an area of 0.2% annual chance of flood. Structural or Treatment Control Best Management Practices (BMPs) are required for this project under the Standard Urban Storm Water Mitigation Plan (SUSMP) conditions assigned by the City. Volume-based or flow-based design standards may be used separately or in combination. Volume-based criteria are used in the sizing of detention or infiltration structures while flow-based criteria are used on swales, catch basin devices or wetlands. The SUSMP requirements, approved by the Regional Water Quality Control Board, call for the treatment of the peak mitigation flow rate or volume of runoff produced by a 0.75 inch 24-hour rainfall event. Various stormwater treatment facilities are to be provided throughout the site to capture and treat stormwater runoff from the site.

Power Systems. Electricity service in the City of West Covina, including the Project site, is provided by the Southern California Edison (SCE) (West Covina 2016b). Natural gas service within West Covina is provided by Southern California Gas Company (West Covina 2016b).

Solid Waste. The City contracts with Athens Services to provide trash, recycling, and special pickup services to residences, commercial, governmental, and industrial uses throughout the City. After collection, waste is taken to the Athens Services Material Recovery Facility (MRF) in the City of Industry. The City of Industry MRF can process 5,000 tons of mixed material per day. Material that cannot be recycled at Athens MRF is routed to the Victorville Sanitary Landfill (West Covina 2016b).

4.0.3 ANALYSIS OF CUMULATIVE IMPACTS

Section 15130 of the State CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not at the same level of detail necessary for the project. Section 15355 of the State CEQA Guidelines defines cumulative impacts as “. . . two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Section 15130(a) of the State CEQA Guidelines states “cumulative impacts shall be discussed when the project’s incremental effect is cumulatively considerable.” Section 15355(b) of the State CEQA Guidelines states “cumulative impacts represent the change in the environment caused by the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable probable future projects

in the vicinity.” Section 15130(b)(1) of the State CEQA Guidelines states that the information utilized in an analysis of cumulative impacts should come from one of two sources, either:

1. A list of past, present, and probable future projects producing related cumulative impacts, including if necessary, those projects outside the control of the agency or
2. A summary of projections contained in an adopted local, regional, or statewide plan or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

Due to the length of time over which the proposed improvements will be implemented and the programmatic nature of the improvements and their phasing, the cumulative impact analyses contained in this Program EIR use the summary of growth projections identified in the City’s General Plan (PlanWC) and its accompanying EIR, which is available to the public as required by Section 15130(b)(1)(B) of the State CEQA Guidelines. For the purposes of quantitative analyses for such issues as traffic, noise, air quality, etc., the Program EIR analyses use a 1.4 percent annual growth rate as recommended in PlanWC. Table 3-1 in PlanWC (page 44) provides the anticipated buildout summary for dwelling units and non-residential square footage of development for the City. The buildout information is presented in Table 4-1 below.

**TABLE 4-1
GENERAL PLAN GROWTH**

Land Use Category	Existing Developed		Additional Growth		
	Parcels	Acres	Acres	Units	Square Feet
Neighborhood Low (0-8 units/acre)	18,557	5,385	--	--	--
Neighborhood Medium (9-20 units/acre)	301	337	--	350	5,000
Neighborhood High (21-54 units/acre)	18	12	--	--	--
Commerce	479	581	--	50	290,000
Industry	45	51	3	--	--
Public & Institutional	72	883	--	--	--
Parks & Open Spaces	211	502	--	--	--
Downtown District	173	229	--	1,700	605,000
BKK District	9	542	542	--	--
TOTAL		8,522	545	2,100	900,000
Source: Table 3-1, Potential Development Based on Carrying Capacity of Land Area, West Covina General Plan (PlanWC), 2016.					

Table 4-1 shows the City expects an additional 2,100 residential units and almost a million square feet of new non-residential development in the coming years. PlanWC did not indicate a specific expected square footage of growth for public or institutional uses; however, the QVHSP does not anticipate additional acreage to be added to the Project site in the future, so the Project itself is consistent with the overall PlanWC growth projections.

In addition to the PlanWC study area, the cumulative impact analysis for individual topical issues may consider specific cumulative study areas designated by respective agencies for regional or areawide conditions. For instance, topic-specific cumulative study areas have been developed for air quality (e.g., South Coast Air Basin). Additionally, this Program EIR considers regional

programs directed at mitigating cumulative impacts of development such as those instituted for urban runoff. A description of the basis for the cumulative impact analysis for individual topical issues is provided within each cumulative analysis discussion in Sections 4.1 through 4.15 of this Program EIR).

4.0.4 REFERENCES

City of West Covina (City) 2016a. West Covina General Plan (PlanWC). City of West Covina, December 2016.

City of West Covina (City) 2016b (December). City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR. West Covina, CA: the City. <http://www.westcovina.org/home/showdocument?id=12212>——, City of. 2010b. West Covina 2016 General Plan Final Environmental Impact Report. Rincon Consultants, Inc. December 2016.

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South Coast Air Quality Management District (SCAQMD). 2016 (August, access date). 2016 Air Quality Management Plan. Diamond Bar, CA: SCAQMD. <http://www.aqmd.gov/aqmp/2016aqmp/index.htm>.

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———. 2012 (April 4 adopted). *2012–2035 Regional Transportation Plan (RTP), Sustainable Communities Strategy Towards a Sustainable Future*. Los Angeles, CA: SCAG. <http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx>.

4.1 AESTHETICS

Aesthetics generally refer to the identification of visual resources, the quality of the view from a public vantage point, and/or the overall visual perception of the environment. The issue of light and glare is related to both the creation of daytime glare due to the reflection of the sun (such as on glass surfaces) and/or an increase in nighttime ambient lighting levels (e.g., from building lights and street lights).

There were no comments from public agencies or the general public relative to aesthetics submitted during the NOP period or as a result of the Scoping Meeting.

4.1.1 RELEVANT POLICIES AND REGULATIONS

State

California Department of Transportation State Scenic Highway Program

The California Department of Transportation (Caltrans) has a California Scenic Highway Program that classifies highways meeting specific criteria as “scenic” throughout California. The purpose of the program is to protect and enhance the scenic beauty of California highways and adjacent corridors through special conservation treatment. According to Caltrans, “a highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler’s enjoyment of the view”. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. An eligible scenic highway becomes an officially designated scenic highway when the local jurisdiction applies for and obtains approval from Caltrans and adopts a Corridor Protection Program (Caltrans 2017).

There are no officially designated scenic highways within the City of West Covina. However, State Route (SR) 57 between SR 91 and SR 60, located approximately 7.5 miles southeast of the Project site, is identified as Eligible for State Scenic Highway designation (Caltrans 2016).

Local

West Covina General Plan

Several goals and policies in the “Our Natural Community” Chapter of the City General Plan (called PlanWC) address aesthetics and the visual environment of the City. These relevant goals and policies are listed in Table 4.9-2 in Section 4.9, *Land Use and Planning*, along with the proposed Project’s consistency with each goal and policy. These relevant design policies identified in PlanWC include policies and goals for the maintenance and enhancement of foreground and distant views.

West Covina Municipal Code

Chapter 7, Buildings and Building Regulations of the West Covina Municipal Code (WCMC) contains regulations relating to the aesthetic character including regulation for building within the City (West Covina 2018a). Chapter 5.4.2, *Secondary Development Standards* includes standards for all parking lot and security lighting to be directed away from surrounding land uses and towards the specific location intended for illumination. Further, state-of-the art fixtures shall be used, and all lighting shall be designed to minimize the production of glare and light spill onto surrounding

used. These standards are developed in accordance with Chapter 26, Zoning, Article X, Division 3, of the City's Development Standards, which identifies development standards such as lighting, landscaping, and exterior design for all non-residential zones to ensure that development within the City is visually cohesive and maintains a specific style.

Chapter 26 of the WCMC contains zoning and land use regulations, both of which affect the visual character and quality of the built environment and land use patterns within the community (West Covina 2018b).

The City's Municipal Code establishes regulations pertaining to the protection of scenic vistas from residential development, however, the City's Municipal Code does not include regulations related to non-residential development.

In addition, Chapter 24 of the Municipal Code outlines the City's review process for the removal of street or parkway trees (i.e., "Trees in Public Places"); however, it does not include regulations related to native or heritage trees (West Covina 2018c). These provisions of the Development Code are further discussed in Section 4.3, *Biological Resources*.

4.1.2 METHODS

This section includes a description of the existing aesthetic condition and visual character of the Project site and surrounding area. It also addresses the visual character of the proposed Project (e.g., building design and architecture, landscaping, and light and glare generation) and provides an analysis of the potential aesthetic impacts that may occur with implementation of the proposed Project. The assessment of visual, light, and glare changes presented in this section is based on field reconnaissance; review of aerial photographs and site photographs; and evaluation of the proposed site development based on implementation of the proposed QVHSP in comparison to existing conditions. In addition, a shade and shadow analysis has been prepared to assess the potential impacts related to shade and shadow cast onto the adjacent uses, particularly the adjacent single-family units, by the proposed buildings and structures.

Visual impacts are determined by defining the visual quality of the area, the expected change as a result of the Project, and the sensitivity of the users to those changes. The sensitivity of users is associated with the length of exposure to the changed views and the context of the views. For example, residential viewers would be more sensitive to changes in the visual quality than workers in nearby offices because residents have a greater connection with the visual character of their neighborhood than people who are passing through or employed in an area.

The CEQA thresholds of significance require an evaluation of whether the Project would substantially degrade the existing visual character or quality of the Project site and its surroundings. The determination of whether the changes in the visual quality of a site would degrade an area or its surroundings, to result in a significant impact, is highly subjective and dependent on the viewer's perspective. In determining whether the Project would degrade the visual character factors such as the viewer groups of the site, the extent to which the Project would create a visually cohesive environment were evaluated.

Additionally, it is important to recognize that the site is located in a larger urban/developed context consisting of a mix of medical office, and health care development, commercial and residential (multi- and single-family) uses. As discussed in Section 4.1.1, *Relevant Policies and Regulations*, no officially designated scenic highways or scenic vistas are within the Project study area that would be affected by demolition, construction, and operation at the Project site.

4.1.3 EXISTING SETTING

Under existing conditions, the Project site is fully developed with minimal topographic variation. According to the Geotechnical Evaluation (Leighton Consulting 2011), the site has been altered by grading and generally slopes southward. The ground surface at the site is at an approximate elevation of 365 feet above mean sea level (msl).

Visual Characteristics of the Project Site and Surrounding Areas

The Project site is currently developed as the Queen of the Valley Hospital Campus, and the adjacent site includes the former Sunset Field Park. The existing hospital services are housed in approximately 1,089,400 square feet (sf) of various single- and multi-level structures on 28.8 acres. Surface parking is currently provided throughout the site. The addition and renovation of the Queen of the Valley Hospital would include the purchase of the approximately 2.85-acre City-owned property northeast of the hospital (former Sunset Field Park).

The property is at the north corner of South Sunset Avenue and West Merced Avenue approximately a half mile south of the I-10 Freeway in the east-central portion of the San Gabriel Valley. The visual character of the area surrounding the Project site is typical of an urban area. As shown on the aerial photograph presented in Exhibit 4.1-1, *Aerial Photograph*, this area is defined by a mix of land uses, including primarily single- and multi-family residential uses, park and recreation uses, and medical office uses. The former Sunset Field park is located adjacent to the northern portion of the Queen of the Valley campus. Multi-family developments (primarily two stories) are found north of the Project site along the westside of Sunset Avenue and are located adjacent to the northeast portion of the site. Commercial and medical offices are also located adjacent to the northeast portion of the site along Sunset Avenue northeast of the Project site. Single-family residential uses are located to the east of the Project site located across Sunset Avenue, to the north and south of Vine Avenue. Commercial and medical offices are also located south of the Project site along Sunset Avenue and along Merced Avenue. Additionally, Orangewood Park, which includes Orangewood Roller Hockey Park and West Covina Skate Park, is adjacent to the western portion of the Queen of the Valley campus just south of the Walnut Creek Wash. South of the Project site, located at the intersection of Sunset Avenue and Merced Avenue, are two gas stations located at the northeast and the southwest corner of Sunset Avenue and Merced Avenue. A strip mall is located at the southeast corner of Sunset Avenue and Merced Avenue and includes restaurants, a pharmacy, and an orthodontist office. In addition, a Kaiser Permanente medical office and Edgewood High School and Middle School are located south of the Project site across Merced Avenue.

The visual character of the Project site is defined by its current use as the existing Queen of the Valley campus and the former Sunset Field Park. The Queen of the Valley campus is fully developed with hospital and accessory uses consistent with both the City of West Covina General Plan and Zoning Ordinance (West Covina 2016a). The fully improved Walnut Creek Channel is offsite but adjacent to the Project site to the north. The former Sunset Field Park site contains mature trees and turf from the former ballfields. The hospital property contains mature trees and landscaped areas throughout the campus, including lawn areas within the interior and main entry ways of the campus. Mature trees line walkways within the campus and the surface parking lot. Section 4.3, *Biological Resources*, includes a description of the existing vegetation and trees on the site.

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Aerial Source: LAR-IAC 2014

Aerial Photograph

Exhibit 4.1-1

Queen of the Valley Hospital Specific Plan EIR



200 100 0 200
Feet

Views

Exhibits 4.1-2a through 4.1-2g, *Existing Site Views*, present photographs that depict the existing visual character of the Project site and surrounding area. Because there is no substantial variation in the overall topography of the Project area (no hillside areas), and the areas surrounding the site to the north, east, south, and west are developed, views of the Project site are primarily limited to roadways and land uses adjacent to the Project site. Views from more distant vantage points are mostly obstructed by the surrounding trees/vegetation and existing development. Therefore, the site photographs were taken from ground level vantage points adjacent to the Project site and are representative of views from surrounding land uses and roadways. The primary viewers of the Project site include travelers on the adjacent roadways, (temporary/short-term views¹), adjacent residents to the north and east (long-term views), and individuals working at or visiting the surrounding businesses, institutional and recreational uses (temporary views). Following is a description of the views of the Project site from various vantage points.

Main Entrance - Views from Northeast of the Campus

- **View 1 – View from Sunset Avenue and Vine Avenue, Looking Northwest.** This photograph shows the main entrance of the Queen of the Valley campus. The main campus entrance signage depicts the hospital name and logo, and the parkway is located adjacent to the main driveway in the forefront. Mature trees and flower shrubs line the entrance median and the landscaped area. The internal directional signage for the campus and existing surface parking lot are shown in the background.
- **View 2 – View from Sunset Avenue and Vine Avenue, Looking West.** This photograph shows the main entrance driveway and the entrance signage with hospital name and logo within the landscaped area adjacent to the main entrance. The main hospital tower is depicted in the background. Mature trees along the eastern boundary of the site and in the surface parking lot partially obstruct views of the hospital tower, lawn, and associated buildings along Sunset Avenue in the northeastern portion of the site.
- **View 3 – View from Sunset Avenue and Vine Avenue, Looking Southwest.** The photograph depicts the landscaped area and main entrance signage depicting the hospital name and logo adjacent to the main entrance. The view of the roadway includes the traffic signals, street lights, roadway median, sidewalks and adjacent landscaping strips, the Foothill Transit bus stop, and West Covina shuttle stop located on Sunset Avenue. A surface parking lot, the Family Birth and Newborn Center, and the adjacent medical office building are shown along Sunset Avenue. In addition, the hospital tower is depicted in the background behind the surface parking lot. As with View 2, mature trees along the eastern boundary of the site partially obstruct views of the hospital tower, surface parking lot, and Family Birth and Newborn Center along Sunset Avenue.
- **View 4 – View from Main Entrance of Hospital, Looking East.** This photograph shows the view looking east at the intersection of Vine Avenue and Sunset Avenue from the main entrance to the hospital. The view includes the interstation traffic signal along Sunset Avenue and the single-family residential neighborhood located across Sunset Avenue, east of the Project site. Distant views from this location are obstructed by existing residential development and mature trees.

¹ Temporary, or short-term, views are those experienced by motorists, pedestrians, site visitors, or anyone who is temporarily in the vicinity of the Project site.

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Aerial Source: LAR-IAC 2014

Existing Site View Locations

Exhibit 4.1-2a

Queen of the Valley Hospital Specific Plan EIR



250 125 0 250
Feet



View 1 - Main entrance into site from Sunset Ave and Vine Ave.



View 2 - Main entrance of hospital looking west from Sunset Ave and Vine Ave.

Existing Site Views

Exhibit 4.1-2b

Queen of the Valley Hospital Specific Plan EIR



View 3 - Looking southwest into site from corner of Sunset Ave and Vine Ave.



View 4 - Looking east from main access onto Sunset Ave and Vine Ave.

Existing Site Views

Exhibit 4.1-2c

Queen of the Valley Hospital Specific Plan EIR



View 5 - Existing view north on Sunset Ave.



View 6 - Existing view south on Sunset Ave looking towards Merced Ave.

Existing Site Views

Exhibit 4.1-2d

Queen of the Valley Hospital Specific Plan EIR



View 7 - Looking west into southern entrance off of Sunset Ave.



View 8 - Looking east out of southern entrance off of Sunset Ave.

Existing Site Views

Exhibit 4.1-2e

Queen of the Valley Hospital Specific Plan EIR



View 9 - Looking northeast at Project Site from Merced Ave.



View 10 - Existing view of site looking north on Sunset Ave.

Existing Site Views

Exhibit 4.1 – 2f

Queen of the Valley Hospital Specific Plan EIR



View 11 - Looking north into site access point on Merced Ave.



View 12 - Looking south from site access at Merced Ave.

Existing Site Views

Exhibit 4.1-2g

Queen of the Valley Hospital Specific Plan EIR

Sunset Avenue - Views from East of the Campus

- **View 5 – View along Sunset Avenue, Looking Northeast.** This photograph shows the views along Sunset Avenue looking northeast at Vine Avenue. The view of the roadway includes the traffic signals, roadway median, sidewalks and adjacent landscaping, the southbound Foothill Transit bus stop, and West Covina shuttle stop located on Sunset Avenue. In addition, the photograph shows residential uses located across Sunset Avenue, east of the Project site and commercial uses located across Sunset Avenue, northeast of the Project site. Mature trees and hedges partially obstruct views of the northeastern edge of the site. Distant views from this location are partially obstructed by existing development and mature trees.
- **View 6 – View into southern Main Entrance of Hospital, Looking Southwest.** This photograph shows the view along Sunset Avenue looking southwest at Merced Avenue. The view of the roadway includes the roadway median, traffic signals, street lights, sidewalks, adjacent landscaping strips, and hospital signage. The view of the southeastern edge of the Project site and hospital signage is partially obstructed by mature trees lining the eastern edge of the site. In addition, the photograph shows the Arco gas station located at the northeast corner of Sunset Avenue and Merced Avenue and commercial uses located south of the Project site across Merced Avenue. Mature trees partially obstruct views of the northeastern edge of the site. Distant views from this location are partially obstructed by existing development and mature trees.

Southern Entrance - Views from South of the Campus

- **View 7 – View into Southern Entrance, Looking Northwest.** This photograph depicts the view looking northwest into the southern entrance of the Project site and includes the view of the Walter and Francine Laband Emergency Center. Landscaping, mature trees and flower shrubs line the entrance driveway and the surface parking adjacent to the southern entrance.
- **View 8 – View from the Southern Entrance, Looking Southeast.** This photograph depicts the view looking southeast from the southern entrance across Sunset Avenue. The photograph depicts the single-family residences located across Sunset Avenue, east of the Project site. Landscaping and the exit stop sign are depicted in the foreground. Distant views from this location are obstructed by existing residential development and mature trees.

Merced Avenue and Sunset Avenue - Views from South of the Campus

- **View 9 – View from Merced Avenue, Looking Northeast.** This photograph shows the views from Merced Avenue looking northeast into the southern portion of the Project site. The view includes the adjacent medical and commercial offices located southwest of the Project site as well as sidewalks and adjacent landscaping. Views of the QVH campus are partially obstructed by mature trees and the adjacent commercial and medical uses. The photograph depicts the medical office building located on the southern edge of the Project site as well as commercial and medical office buildings located along Merced Avenue southwest of the Project site. Mature trees partially obstruct views of the southern edge of the site. Distant views from this location are partially obstructed by existing development and mature trees.
- **View 10 – View along Sunset Avenue, Looking Northeast.** This photograph shows the views along Sunset Avenue looking northeast into the southern portion of the Project site. The view of the roadway includes the roadway median lined with mature trees, street lights, sidewalks and adjacent landscaping, and the northbound Foothill Transit bus stop located on Sunset Avenue. The photograph depicts the medical office building located on the southern edge of the Project site and the Family Birth and Newborn Center located on the eastern portion of the Project site. Mature trees partially obstruct views of the southern and eastern edge of the site. Distant views from this location are partially obstructed by existing development and mature trees.

Western Entrance – Views from West of the Campus

- **View 11 – View into Western Entrance, Looking Northeast.** This photograph depicts the western entrance of the Project site. The photograph shows the private road that runs from Merced Avenue to the hospital campus, terminating at the surface parking lot at the north end of the Project site. The views include the surface parking lots for the adjacent commercial uses located west of the Project site. Landscaping strips, hedges, and mature trees line the entrance driveway and private road. Distant views from this location are partially obstructed by existing development and mature trees.
- **View 12 – View from the Western Entrance, Looking Southwest.** This photograph depicts the view looking southwest from the western entrance of the Project site looking southwest across Merced Avenue. The photograph depicts Edgewood High School located across Merced Avenue, southwest of the Project site. Landscaping and the exit stop sign are depicted in the foreground with the school's perimeter fencing and tennis courts in the background. Distant views from this location are partially obstructed by the existing high school and mature trees.

Walnut Creek Parkway – Views from Northwest of the Campus

- **View 11 – View into Project Site, Looking Southeast from Leewood Street and Walnut Creek Parkway.** This photograph depicts the view looking southwest from the right-of-way along Walnut Creek Parkway at Leewood Street, located within a single-family residential neighborhood to the northwest of the Project site. The photograph depicts the existing right-of-way, vegetation, mature trees, and fencing that line the east and west sides of the Walnut Creek Wash. As depicted in the photograph, the single-family residential uses located along Walnut Creek Wash are separated from the project site by the existing right-of-way, the Walnut Creek Wash, and two landscape buffers along each side of the wash. A portion of the existing medical tower and small sections of the existing surface parking lot can be seen in the background of the photograph, mostly

obstructed by mature trees. Most of the Project site is obstructed by mature trees and shrubs lining the east and west sides of the Walnut Creek Wash.

- **View 12 – View into Project Site, Looking South from Robindale Street and Walnut Creek Parkway.** This photograph depicts the view looking southwest from the right-of-way along Walnut Creek Parkway at Robindale Street, located within a single-family residential neighborhood to the north of the Project site. The photograph depicts the existing right-of-way, vegetation, mature trees, and fencing that line the east and west sides of the Walnut Creek Wash. A portion of the existing medical tower, existing modular buildings and small sections of the existing surface parking lot can be seen in the photograph, mostly obstructed by mature trees. Most of the Project site is obstructed by mature trees and shrubs lining the east and west sides of the Walnut Creek Wash. Light and Glare

Artificial lighting is widely utilized in most urban and suburban areas to provide visibility for both traffic and security. Light sources at the Project site include parking lots, walkway and parkway lights, and exterior building security lighting. Other sources of light in the surrounding area include streetlights on Sunset Avenue, Vine Avenue, and Merced Avenue; abutting Orangewood Park's soccer fields; parking lot and exterior security lighting associated with adjacent commercial uses; and exterior lighting from adjacent multi- and single-family residential uses. Other light sources in the Project area include headlights from passing vehicles on adjacent and nearby roadways, including Sunset Avenue, Vine Street and Merced Avenue.

The Project site contains buildings and related improvements with existing sources of light and glare that comply with the City's building and lighting standards (West Covina 2018a; 2018b). The hospital currently operates 24-hour/day, 7-days per week in its main tower and emergency center, and there is lighting associated with the operation of the facility in addition to lighting for safety on campus.

4.1.4 THRESHOLDS OF SIGNIFICANCE

Thresholds Addressed in this Program EIR

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact on aesthetic/visual character and lighting if it will:

- Have a substantial adverse effect on a scenic vista.
- Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality if the site and its surroundings.
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.5 ENVIRONMENTAL IMPACTS

Impact Analysis

Threshold 1.1	Would the project have a substantial adverse effect on a scenic vista?
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The West Covina General Plan does not identify any designated scenic vistas. However, the Los Angeles National Forest and San Gabriel Mountains are visible in the background throughout West Covina; however, their views are dependent on the viewer's vantage point and orientation.

As previously shown in the site photographs, views of the San Gabriel and San Bernardino Mountains are visible from the Project site and provide a scenic backdrop from certain vantage points; however, these views are partially obstructed by existing development and mature trees and are limited due to the topography of the area. Views from publicly accessible locations directly east of the Project site on Sunset Avenue are shown on Exhibit 4.1-1a through 4.1-1c. Views along Sunset Avenue from the eastern edge of the Project site are also of the San Gabriel Mountains (View 5, View 9 and View 10); however, as discussed previously, these views are partially obstructed by development and mature trees. Views looking southwest along Sunset Avenue from the eastern edge of the Project site are of the Puente Hills (View 6). However, as discussed previously, these views are partially obstructed by development and mature trees.

Under the "Our Natural Community" Chapter of the PlanWC, Access to Nature, Policy 1.9, encourages minimization of view obstruction by requiring analysis of potential impacts to views of natural areas from public streets, parks, trails, and community facilities, during review of public and private development projects.

The Queen of the Valley Hospital campus is currently developed with hospital facilities and accessory uses, including surface parking, and multi-story buildings, as well as modular buildings. However, implementation of the QVHSP would result in denser development than the existing campus and would include construction of new structures and buildings. The development guidelines of the QVHSP would be more restrictive than the existing Specific Plan. The existing Specific Plan includes a six-story height limit for the entire area. The development of the QVHSP would require new parking structures to be subject to a 60-foot height limit. Buildings would be subject to a six-story height limit in Zones 1 and 2. Zone 3 would reduce the height limit to 30 feet for parking structures and three stories for buildings.

Direct views of the San Gabriel Mountains and Puente Hills would be preserved along Sunset Avenue through compliance with the development standards and design concept set forth in the proposed QVHSP. Compliance would ensure that view corridors for motorists, pedestrians and bicyclists traveling along Sunset Avenue are maintained.

Due to the proposed Project's location in the central area of the City and the lack of scenic resources in the immediate area, the proposed hospital expansion as identified in the Specific Plan would not have a substantial adverse effect on a scenic resource. Views of the San Gabriel Mountains and Puente Hills from Sunset Avenue would not be obstructed. Also, the West Covina General Plan does not identify any designated scenic vistas, and therefore, development of the Project would not conflict with the City's regulations and programs related to scenic vistas.

Implementation of the QVHSP would not further exacerbate obstruction of existing views, which are currently blocked by existing development and mature trees. Therefore, the proposed Project would not block views of the San Gabriel Mountains, and impacts related to scenic vistas would be less than significant. While, impacts are less than significant, compliance with the development

standards of the QVHSP would further ensure that impacts to mountain views remain less than significant. No mitigation is required.

Summary of Impacts. The proposed Project would not further exacerbate obstruction northern views of the San Gabriel Mountains or southern views of the Puente Hills along Sunset Avenue, and impacts related to scenic vistas would be less than significant. While, impacts are less than significant, compliance with the development standards of the QVHSP would further ensure that impacts to mountain views remain less than significant. Impacts on scenic vistas would be less than significant.

Threshold 1.2	Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
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The Queen of the Valley campus is not located within or near a State scenic highway, and there are no scenic resources, including trees, rock outcroppings, and historic buildings in the vicinity of the Project site. The nearest Officially Designated and Eligible State Scenic Highways are located approximately 20 miles north and over 2.5 miles south of the Project site, respectively (Caltrans 2011). Views of the Project site from the portion of SR-57, which is an Eligible State Scenic Highway, are completely obstructed by intervening topography, and there is no direct line-of-sight to the Project area such that short-term construction activities and long-term operation would affect public views from SR-57. Therefore, implementation of QVHSP would not damage scenic resources within a State scenic highway. Impacts would be less than significant, and no mitigation is required.

Threshold 1.3	Would the project substantially degrade the existing visual character or quality of the site and its surroundings?
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Construction-Related Visual Changes

During construction, there would be views of construction activities in various stages on the Project site, including soil excavation and associated construction equipment, building construction activities and equipment, and building material stockpiles. In general, views of construction activities may be considered unappealing by some; however, construction is common in urban areas. Consistent with typical construction activities in urban areas, perimeter screening would be installed around the Project site, which would obstruct views of ongoing construction activities from adjacent ground level vantage points. Additionally, given the size of the Project site there are various locations where construction staging could occur. Construction staging areas should be located as far as practical from adjacent residential uses. Without mitigation, potential short-term construction activities might result in significant short-term impacts related to visual character or quality.

Long-Term (Operational) Visual Changes

The visual impacts of a Project include both the objective visual resource change created by the Project and the subjective viewer response to that change. Distance from a Project site, frequency of view, length of view, viewer activity, viewer perception, and viewing conditions contribute to the assessment of a visual impact. Different viewer groups' perception of the visual environment and its elements varies based on viewer activity and awareness. Activities such as commuting in traffic can distract an observer from many aspects of the visual environment. Off-site views for motorists are short-lived. Conversely, pleasure driving or relaxing in a scenic environment can encourage

an observer to look at the view more closely and at greater length, thereby increasing the observer's attention to detail. Sensitivity is also determined by how much the viewer has at stake in the viewshed. Typically, people who reside or own property in an area are more sensitive to change than those just passing/commuting through an area. Existing viewer groups that would experience the change in visual character resulting from the implementation of the proposed Project were previously described under existing conditions, and generally include people traveling along adjacent roadways; employees and visitors at businesses located northeast and southwest of the Project site along Sunset Avenue; and residents along the north eastern and eastern Project boundary as well as those residents across the Walnut Creek Wash to the north and northwest, if views are not obstructed by trees and vegetation.

Onsite

The QVH campus is currently fully developed with a hospital and accessory buildings and structures. Development allowed by the proposed Specific Plan would keep the prominent visual features of the site consistent with the current hospital uses and on-site site amenities, and thus, the visual character of the site would remain consistent with the current onsite uses, and adjacent office and commercial uses. The development of the proposed Specific Plan would include development of additional surface parking at the former Sunset Field Park site, demolition of the existing one-story Marian building and existing modular buildings and the development of the new Medical Office Building and Ambulatory Surgery Center, development of the new Tower located in the existing landscaped turfed lawn area, the new Intensive Care Unit and Emergency Room building, and development of multi-story car parking structures proposed within the existing surface parking lot. The QVH campus is surrounded by urban development that includes primarily medical office buildings, in addition to three-level high-density residential structures, single-family residential, and recreational uses. The proposed Project would expand and improve the existing facilities on the hospital campus. The proposed Project would introduce new buildings with increased density and would change the existing appearance of the campus. However, compliance with the City of West Covina Municipal Code and architectural, landscape, and signage/wayfinding design guidelines within the Specific Plan document would help to avoid potential impacts and enhance the visual character of the site. Implementation of the guidelines would create a unified development with less than significant impacts.

Since the proposed Queen of the Valley Specific Plan is a programmatic document, design details are yet to be determined for specific development applications, including, but not limited to details related to final architectural style, materials, fenestration patterns, massing, color, signage, landscape and hardscape treatments, and lighting. However, the proposed Specific Plan contains development standards, architectural guidelines, and landscape design guidelines that would ensure that future uses, and buildings convey a cohesive community identity in the proposed urban living environment. Proposed uses would exhibit design quality, by devoting consideration to scale, massing and articulation; providing architectural detailing; and using quality building materials. Exhibit 3-5 in Section 3, Project Description, provides photographs that depict the conceptual vision for the proposed development.

Chapter 4.4, *Landscaping* of the Specific Plan, addresses landscape placemaking, landscape guidelines, streetscapes, with guidelines that promote the aesthetic value of the community by defining, unifying, and enhancing the public realm. Further, tree replacement, protection, and maintenance would be conducted in accordance with the requirements set forth in the City of West Covina's "Street Trees" Section of PlanWC. This document also addresses the replacement of any street trees if any are removed or damaged during construction (Policy 1.11 and Action 1.11b) (City of West Covina 2016). (refer to Section 4.3, *Biological Resources*).

As identified in Chapter 4.4.5 *Walls & Fences*, of the Specific Plan wall and fence designs, materials, colors, and finishes would complement adjacent architecture and would incorporate the use of pilasters or other design elements to help break up long stretches of walls and to provide interest and rhythm. The maximum height of walls, fencing, and gates would consistent with applicable provisions within the Specific Plan or the City's Zoning Code.

Surrounding Area

With respect to visual changes experienced by viewer groups from existing residential and non-residential use adjacent to the Project site, the intent of the design guidelines outlined in the proposed Specific Plan is to encourage design that complements existing building forms and functions and to ensure that development of the QVHSP would not degrade the visual character of the site and surrounding area.

As previously discussed (and shown in Views 1 and View 4, in Exhibit 4.1-2b and 4.1-2c) high-density residential and single-family uses are located along the northeastern portion of the Project site, across Sunset Avenue to the east of the Project site, and across the Walnut Creek Wash to the northwest of the Project site. The abutting high-density residential buildings have primarily three-story massing with varied setbacks and articulation and have walkways and balconies along the northeastern site boundary that currently offer views of QVH campus parking lot and campus. The views from lower levels of the residential buildings are partially obstructed by carports, walls, existing trees and vegetation.

As previously discussed, the conceptual architectural vision for the Project is depicted on photographs presented on Exhibit 3-11 in Section 3, *Project Description*. As shown, various architectural techniques would be applied to break up the mass and scale of proposed buildings and add a human scale to the massing, such as articulation of building facades, windows, entries, and use of color and design detail.

A minimum 10-foot landscape buffer and building setback would be provided along the eastern boundaries of the Project site adjacent to Sunset Avenue. A 15-foot setback would be provided to abutting residential, open space uses, and the Walnut Creek Wash would be provided to enhance the visual character and provide a buffer from these uses (refer to Exhibit 3-10, *Setbacks*, in Section 3, *Project Description*). It should also be noted that the existing trees and landscaping along Sunset Ave within the setback/buffer area would continue to obstruct views into the Project site, or from the Project site to the adjacent areas

As identified in the site photographs, there are office and medical uses, and associated surface parking facilities north and northeast of the site along the Sunset Avenue as well as to the south and southwest of the Project site. The introduction of new medical buildings and associated parking structures in compliance with the development standards and design guidelines outlined in the Specific Plan as conceptually described in Exhibit 3-5 through 3-9 in Section 3, *Project Description*, would not degrade the visual character of the Project site or surrounding area when considered in the context of non-residential uses.

As mentioned above, a minimum 15-foot building setback would be provided along the western and southwestern boundaries near the adjacent Orangewood Park and Walnut Creek Wash. It should also be noted that the fencing along Orangewood Park, as well as existing planters and trees within the setback/buffer area along the perimeter of the Project site would continue to help to obstruct views into the Project site, or from the Project site to the adjacent areas.

Street Views

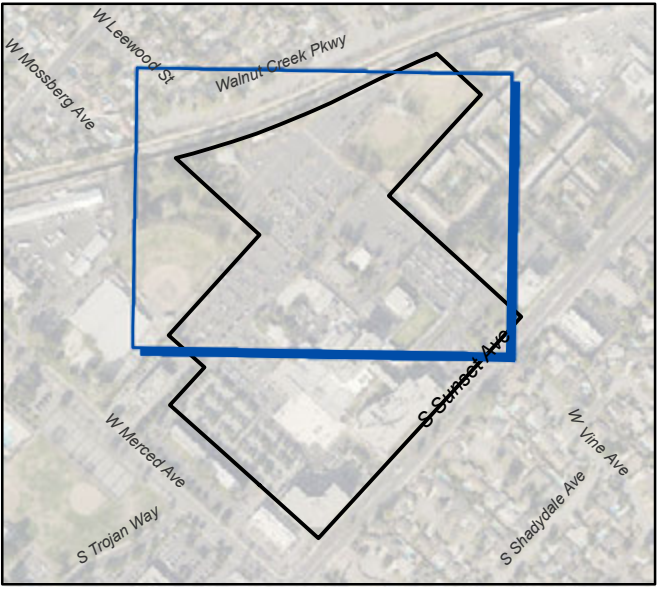
With respect to adjacent roadways, changes in views would be most notable for people traveling north and south along Subset Avenue adjacent to the Project site and those traveling east and west Merced Avenue. As noted previously, these views would be momentary. As shown in the site photographs, Sunset Avenue currently has landscaped medians and parkways along the southern side of the street with pedestrian sidewalks along the north side. The main entry intersection of the QVH campus from Sunset Avenue and Vine Avenue leading into the campus would likely remain as shown in View 5 of Exhibit 4.1-2d, though alternative configurations may be considered as long as they comply with applicable City Public Works/traffic engineering requirements. The secondary access from Sunset Avenue located south of the main entrance would also remain as shown in View 6, 7 and 8 of Exhibit 4.1-2d and 4.1-2e, though this entrance may be relocated, pending future review of applicable City Public Works/traffic engineering requirements. Both of these entrances include signage and landscaping.

Further, views along Merced Avenue from vantage points including Edgewood High School and the Kaiser Permanente office building surface parking lot would remain as the views are mostly obstructed by the medial and commercial office buildings located south and southeast of the Project site as shown in View 9 and View 10 in Exhibit 4.1-2f. The access to the Project site from the south at Merced Avenue would remain unchanged as shown in Views 11 and 12 in Exhibit 4.1-2g, though this point of entry may be reconfigured and/or signalized pending future review of applicable City Public Works/traffic engineering requirements.

Shade and Shadow Analysis

The City of West Covina does not have standards, regulations, or ordinances governing shading of adjacent properties. Shade and shadow in urban settings is common where differences in building height occur among structures in adjacent or nearby development. Taller buildings have the potential to shade adjacent land uses; and, depending on the circumstances and duration of this shading, the effect may be regarded as adverse. A shade and shadow analysis was conducted for the proposed Project to determine if shadow-sensitive uses surrounding the proposed building would be impacted by shade or shadow effects. The computer-generated shade and shadow simulations were prepared by inputting building height, setbacks, geographic location, orientation, day of year, and time of day. Calculation and interpretation of this information provide the location of the sun over the earth, producing an accurate angle of the sun and the resulting shadows. The shade and shadow analysis included modeling the anticipated conditions at 9 AM, 12 PM, and 3 PM on June 21 (summer solstice) and December 21 (winter solstice), which represent the days of the year with the longest and shortest periods of daylight, respectively. The modeling also assessed the conditions at 9 AM, 12 PM, and 3 PM on March 21 (spring equinox). Since the shade conditions in the fall equinox are identical to the spring equinox, the modeling was not conducted for fall equinox. Exhibit 4.1-3a through Exhibit 4.1-3i depict the results of the shade and shadow analysis.

By analyzing the shade and shadow effects at multiple times of day, the Earth's rotation around the sun is illustrated. For example, during early morning hours (sunrise), the sun is positioned low in the sky and casts longer shadows. As the day progresses, shadow lengths become shorter as the sun approaches its highest point in the sky around midday (noon). From this point in the day, the sun's position in the sky becomes progressively lower, and the corresponding shadows become longer until the sun disappears beyond the horizon at sunset. As a rule, the longest shadows are cast during the winter months; and the shortest shadows are cast during the summer months, with the longest shadows cast during the morning and afternoon hours and the shortest shadows cast during the noon hour. Based on review of existing uses surrounding the Project



- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
 - 9:00AM
 - 12:00PM
 - 3:00PM

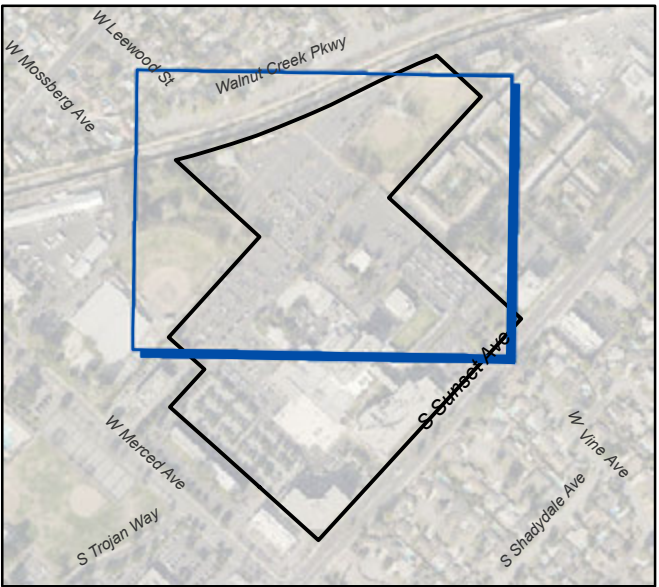
*Time based on UTC-7, Pacific Daylight Time

Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Phase 1, Spring Equinox
Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.1–3a

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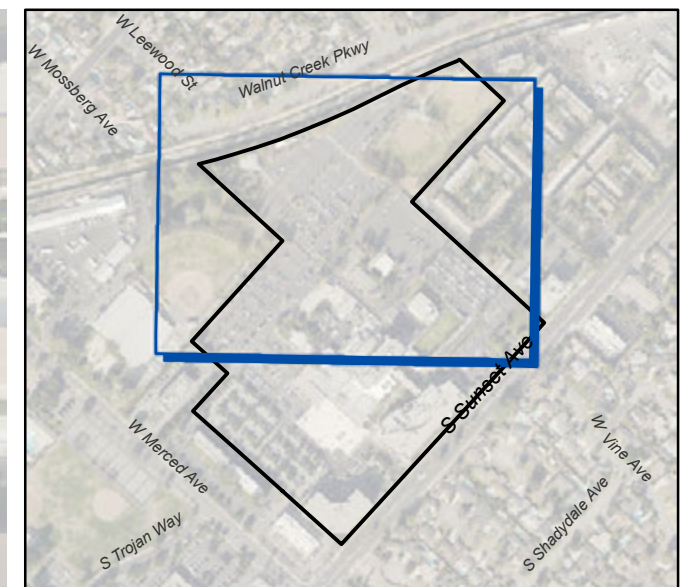


- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
 - 9:00AM
 - 12:00PM
 - 3:00PM

*Time based on UTC-7, Pacific Daylight Time

Aerial Source: LAR-IAC 2014

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- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
 - 9:00AM
 - 12:00PM
 - 3:00PM

*Time based on UTC-8, Pacific Standard Time

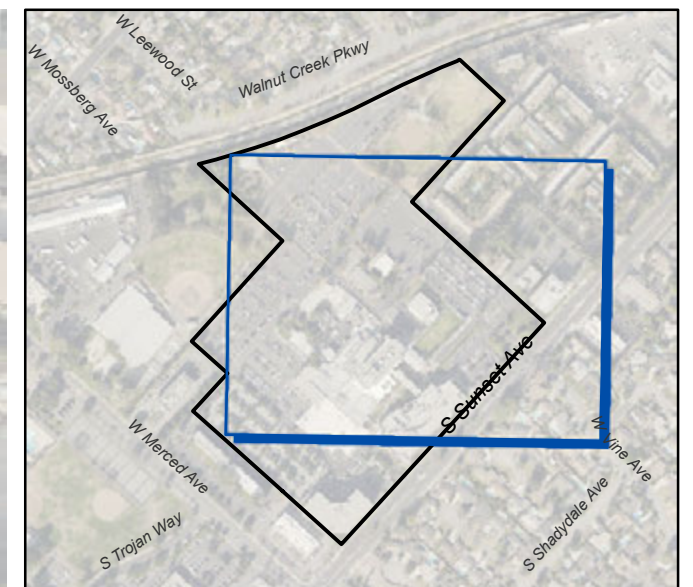
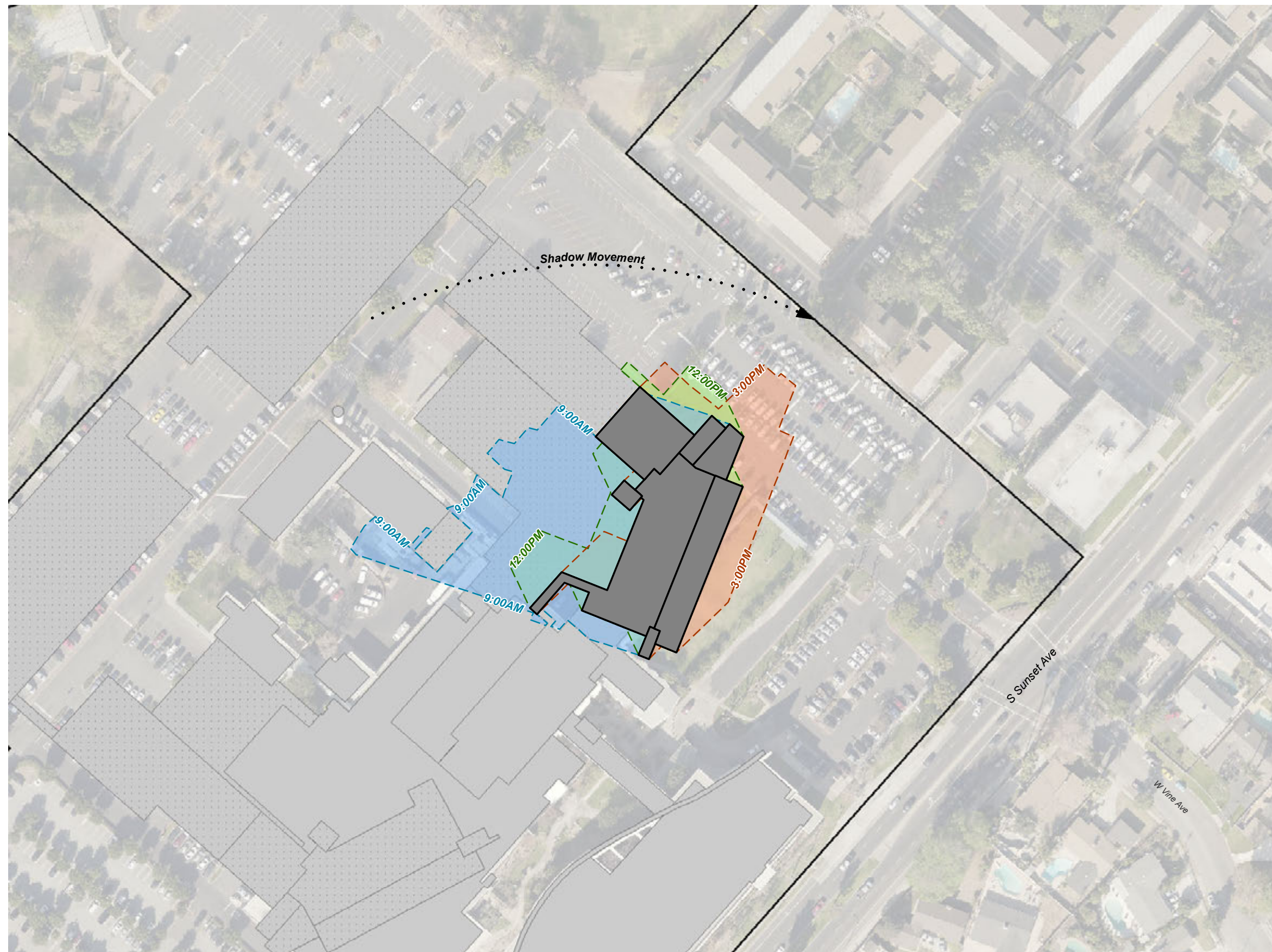
Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Phase 1, Winter Solstice

Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.1–3c

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- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
- 9:00AM
- 12:00PM
- 3:00PM

*Time based on UTC-7, Pacific Daylight Time

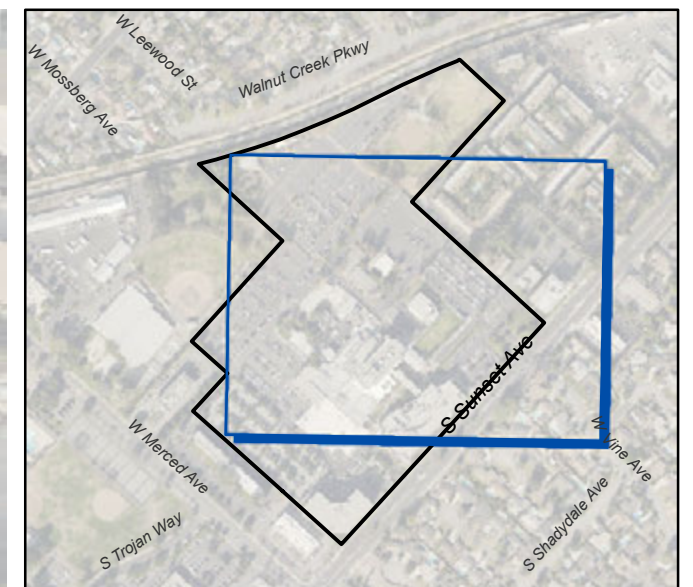
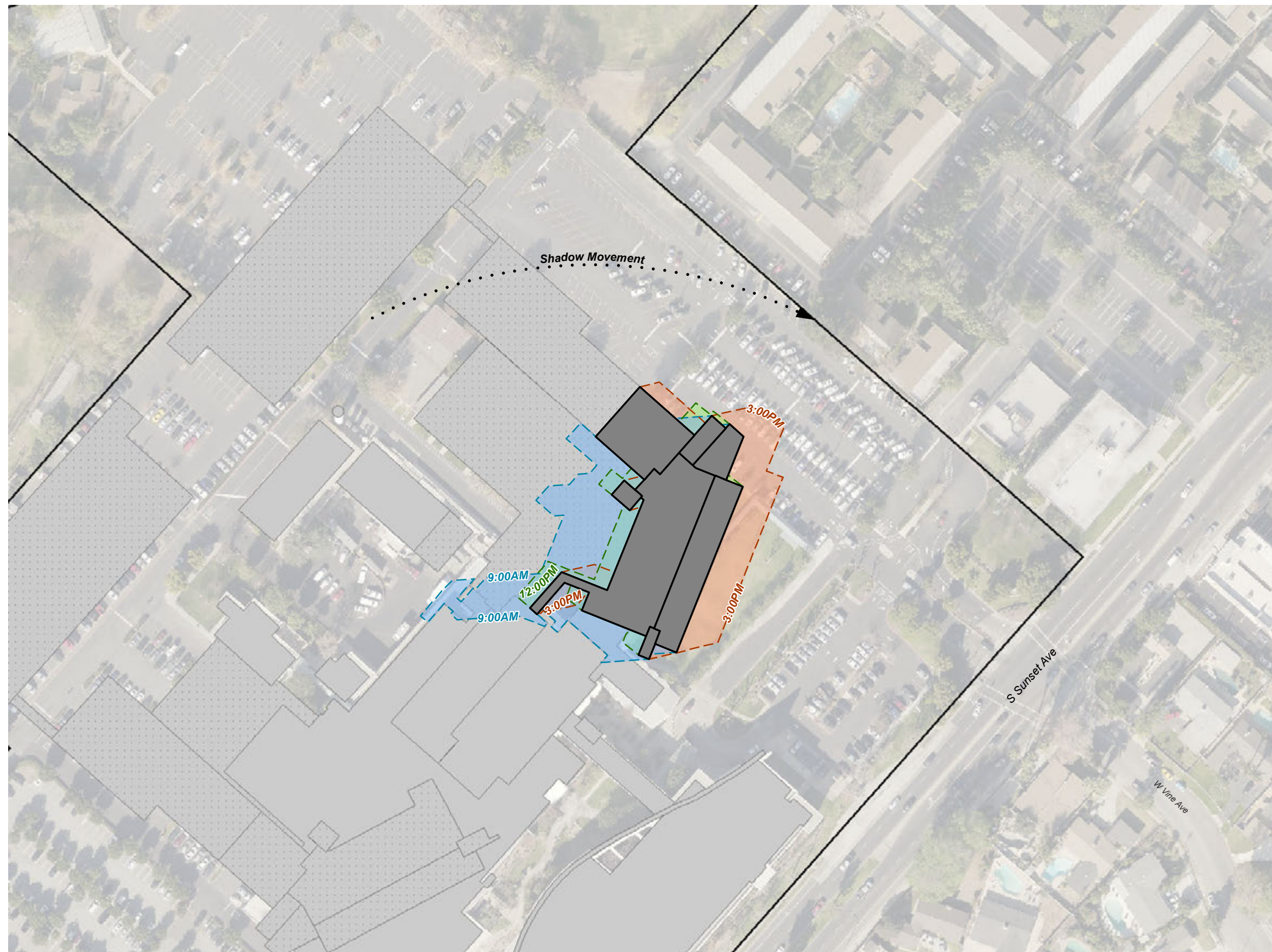
Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Phase 2, Spring Equinox

Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.1–3d

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- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
- 9:00AM
- 12:00PM
- 3:00PM

*Time based on UTC-7, Pacific Daylight Time

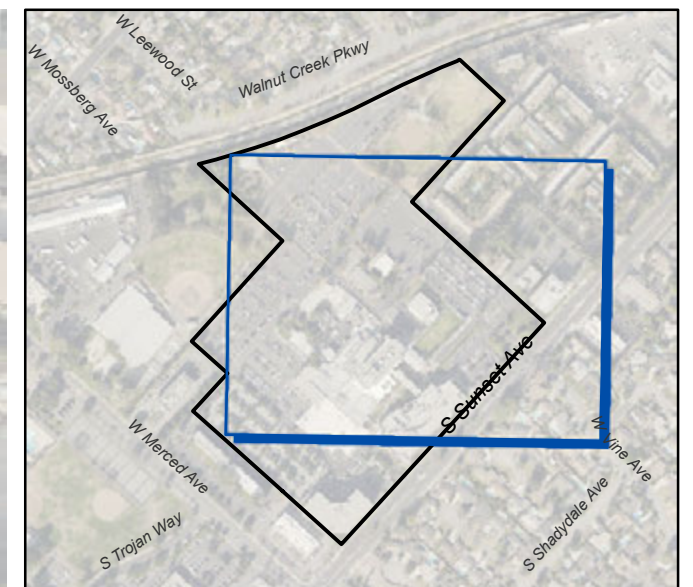
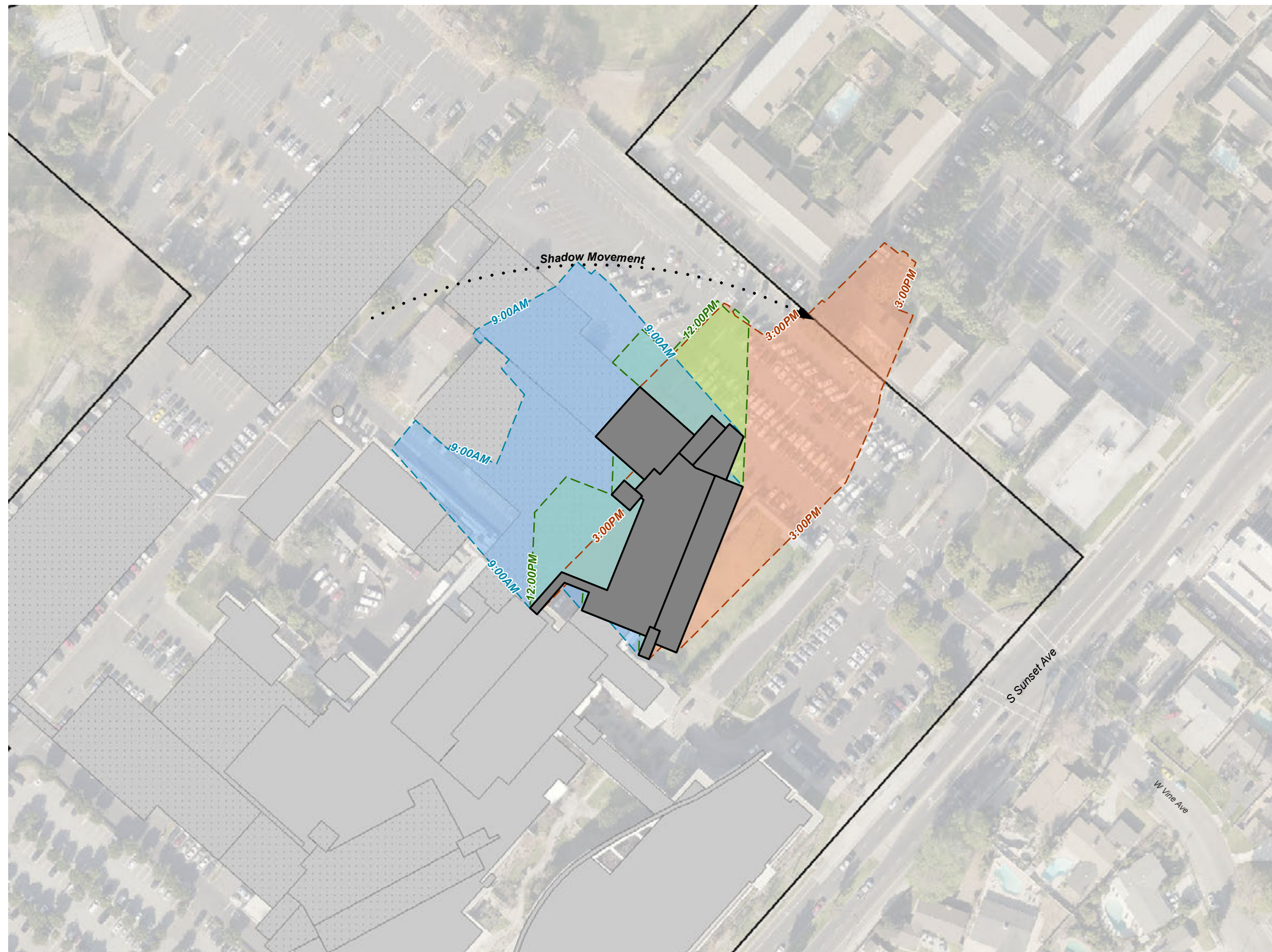
Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Phase 2, Summer Solstice

Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.1–3e

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- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
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 - 12:00PM
 - 3:00PM

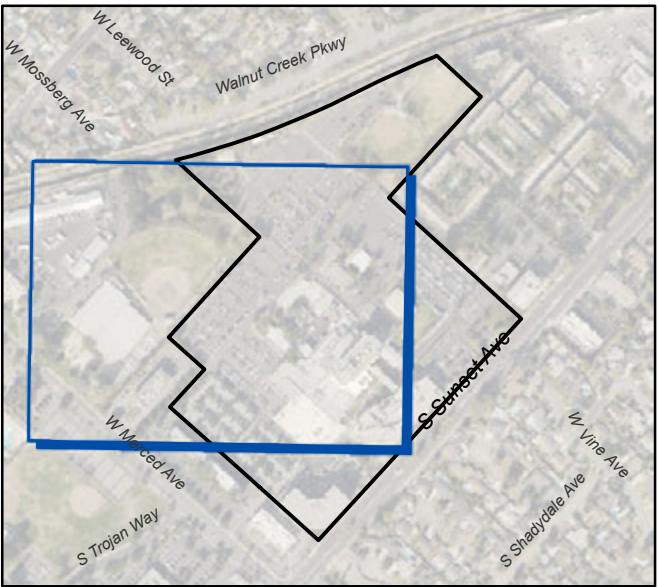
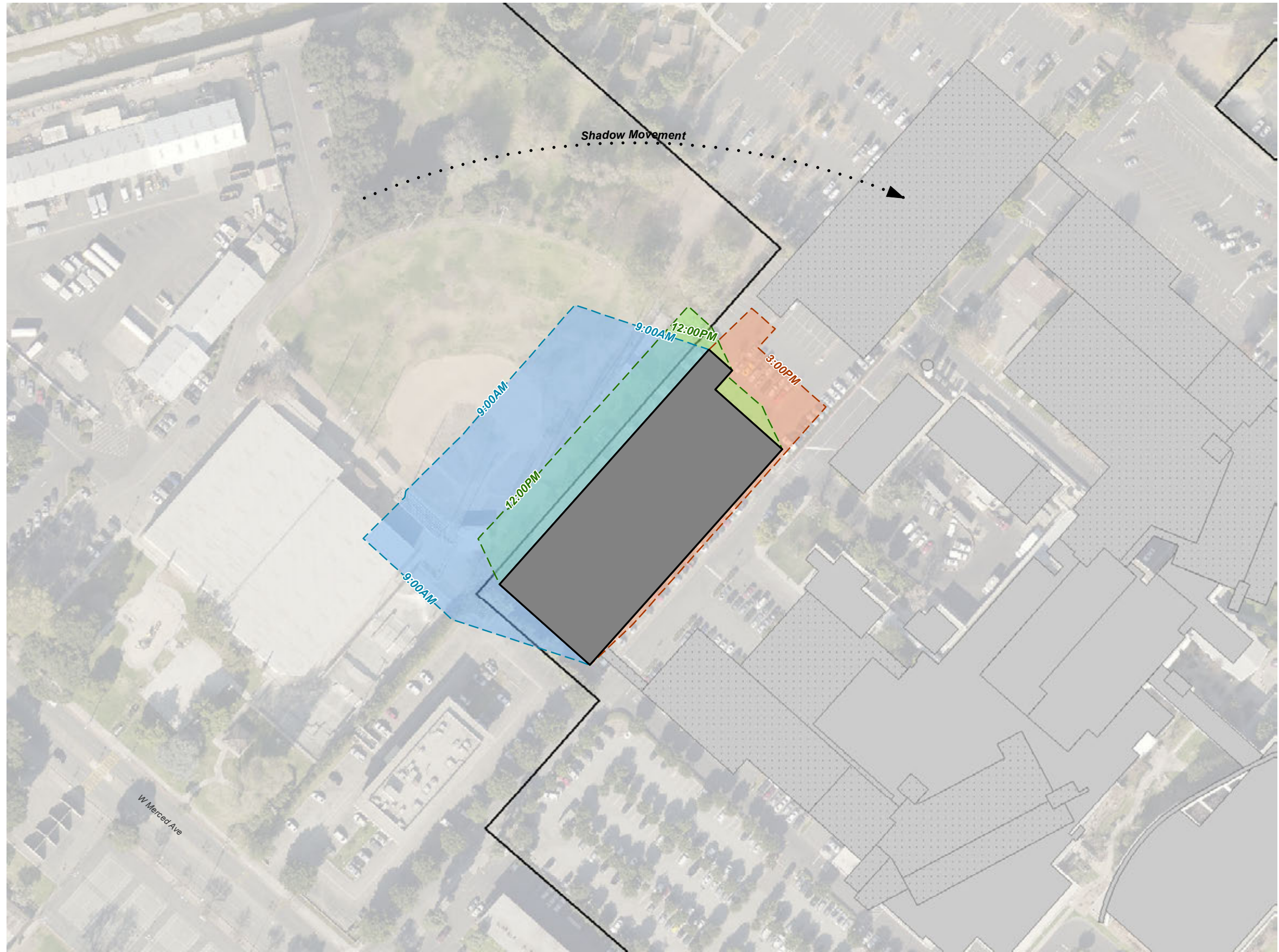
*Time based on UTC-8, Pacific Standard Time

Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Phase 2, Winter Solstice

Queen of the Valley Hospital Specific Plan EIR

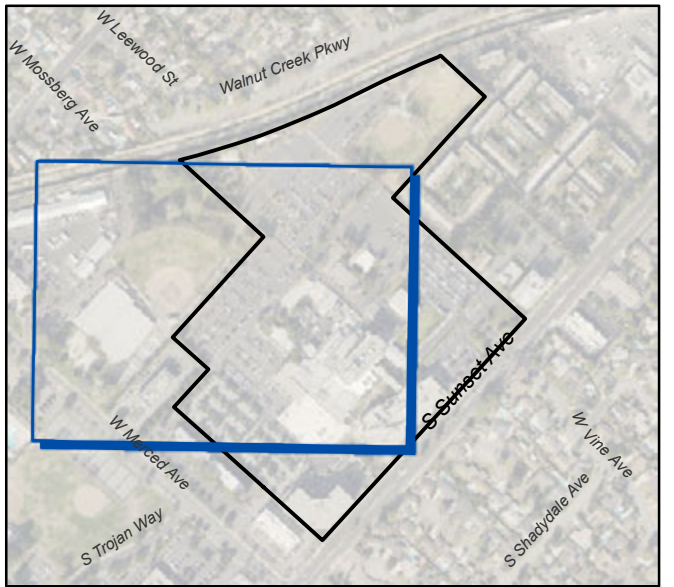
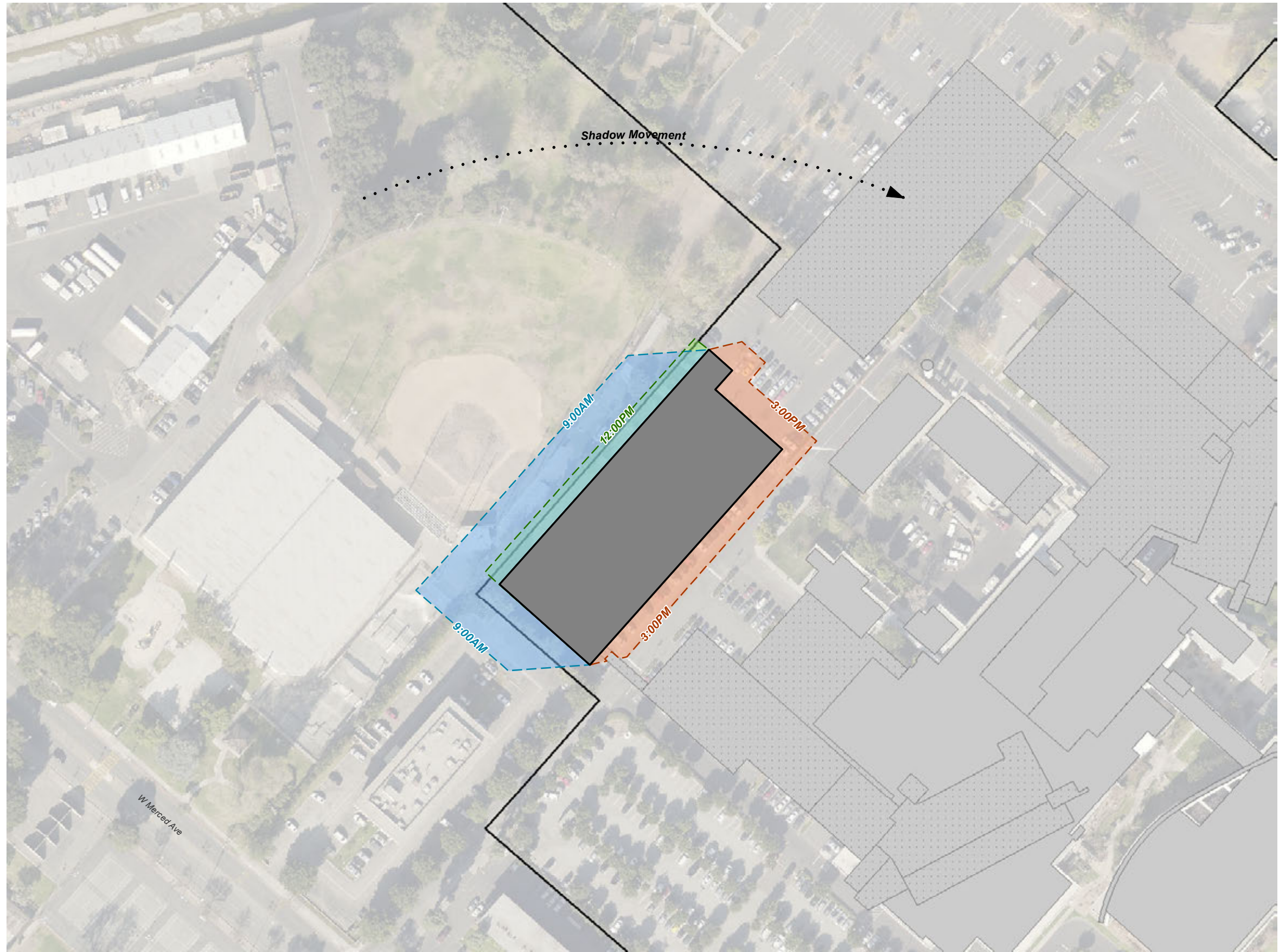
Exhibit 4.1–3f



- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
 - 9:00AM
 - 12:00PM
 - 3:00PM

*Time based on UTC-7, Pacific Daylight Time

Aerial Source: LAR-IAC 2014



- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
 - 9:00AM
 - 12:00PM
 - 3:00PM

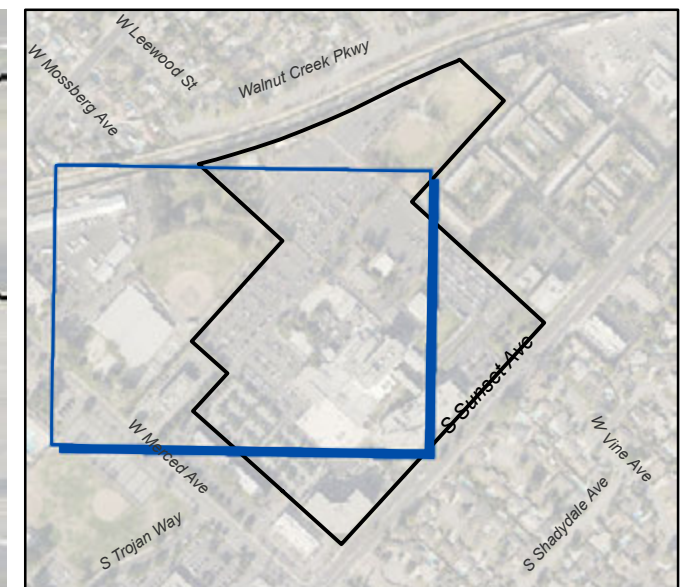
*Time based on UTC-7, Pacific Daylight Time

Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Long Range, Summer Solstice Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.1–3h

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- Project Boundary
- Modeled Proposed Building Footprint
- Other Proposed Buildings
- Existing Buildings On-Site
- Modeled Shadows by Time of Day***
 - 9:00AM
 - 12:00PM
 - 3:00PM

*Time based on UTC-8, Pacific Standard Time

Aerial Source: LAR-IAC 2014

Shade and Shadow Impacts – Long Range, Winter Solstice

Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.1–3i

site, the primary and only shadow-sensitive uses are the multi-family residential units immediately adjacent and to the northeast of the Project site and the Orangewood Park recreational facility located to the west of the Project site.

A shadow impact is normally considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time, or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). For purposes of analysis of the proposed Project and based on the types of surrounding uses, shadow-sensitive uses would include the adjacent multi-family residential uses and associated outdoor residential areas, and Orangewood Park outdoor recreational facilities.

The proposed QVHSP would cast a minimal shadow on the adjacent Orangewood Park soccer field during spring equinox (March 21), fall equinox and winter solstice (December 21) during Phase I and would cast a minimal shadow on the adjacent multi-family residential units during winter solstice (December 21) during Phase II. Exhibits 4.1-3a through 4.1-3c depict spring equinox, summer solstice and winter solstice for Phase I of the proposed Project; Exhibits 4.1-3d through 4.1-3f depict spring equinox, summer solstice and winter solstice for Phase II of the proposed Project; and Exhibits 4.1-3g through 4.1-3i depict spring equinox, summer solstice and winter solstice for the Long Range of the proposed Project.

The shadow during the spring equinox (and fall equinox), summer solstice and winter solstice for Phase 1, which includes the multi-story parking structure, would minimally cover a small portion of the northeast corner of Orangewood Park's soccer field immediately adjacent to the northwestern portion of the QVH campus surface parking lot. During this time of the year, the shadow peak would occur at 9 AM, leaving a majority of daylight hours without any shadow or shade cast by the proposed parking structure on the adjoining park. The shadow that would be cast by the MOB and ASC building proposed in Phase I during winter solstice would minimally cover a small portion of the surface parking lot of the adjacent multi-family residential units located northeast of the QVH campus but would not cast shadow on any residential structures. During this time of the year, the shadow would peak at 3 PM and recede by dusk at approximately 4:45 PM, with the parking lot shaded less than three hours within the 9 AM to 3 PM period and leaving a majority of daylight hours without any shadow or shade cast by the Phase I proposed building.

The shadow during the winter solstice for Phase II, which includes the new tower, would minimally cover a small portion of the adjacent multi-family residential units located northeast of the QVH campus over one residential structure. During this time of the year, the shadow would peak at 3 PM and recede by dusk at approximately 4:45 PM, leaving a majority of daylight hours without any shadow or shade cast by the Phase II proposed tower.

The shade and shadow analysis for development of the 400-car parking structure proposed in the Long Range Campus Development of the Project assumes the future location of the building and where the shadow would cast in relation to shadow-sensitive uses and thus is speculative in nature. However, a "worst-case" shade and shadow analysis was conducted for the Long Range Campus Development. Based on this analysis, the second proposed parking structure would cast a shadow over a major portion of the adjacent Orangewood Park soccer field at the 9 AM peak hour during the spring equinox and winter solstice. At 12 PM, a minor shadow would cast at the edge of the soccer field adjacent to the QVH campus surface parking lot at both the spring equinox and winter solstice. The shadow that would cast by the parking structure during summer solstice would minimally cover a small portion of the soccer field and adjacent commercial surface parking.

ased on the shade and shadow analysis, no buildings or structures proposed in the Long Range Campus Development would adversely affect adjacent residential uses.

Upon initiation of the Long Range Campus Development and the availability of detailed information related to design and configuration, a shade and shadow analysis should be prepared and submitted along with future application.

While the proposed Project would alter the existing visual character of the Project site and views from surrounding vantage points, this change would not be considered a substantial degradation of the Project site or its surroundings.

Summary of Impacts. The proposed Project would be compatible with the surrounding use and not visually intrusive; the mass and scale of the proposed structure would be consistent with existing buildings on the QVH campus. During construction, staging areas should be located as far from as possible from residential uses (refer to AES-1 and AES-4). Changes in the visual character of the site (as seen by those traveling along adjacent roadways, adjacent residents, and adjacent employees) would occur with implementation of development allowed by the Specific Plan. However, development of the proposed buildings and the associated uses in compliance with the development standards and design guidelines identified in the proposed Specific Plan, including height restrictions (refer to AES-2) would create a visually cohesive community that would not substantially degrade the existing visual character or quality of the site and its surroundings. In addition, building any tall structures near the Orangewood Park soccer fields will require more detailed shade and shadow analysis (refer to AES-3).

AES-1 Construction staging areas shall be located as far as practical from residential neighborhoods immediately adjacent to the Project site, and perimeter fencing shall be installed to obstruct views from adjacent ground level vantage points into the Project site during construction. Implementation of this measure shall be verified by the City during construction.

AES-2 The development of the QVHSP limits new parking structures to 60 feet in height. Buildings would be subject to a six-story height limit in Zones 1 and 2. Zone 3 would reduce the height limit of 30 feet for parking structures and three stories for buildings. Compliance with the established height limits shall be confirmed by the City in accordance with implementation provisions outlined in Chapter 6 of the Queen of the Valley Specific Plan prior to the issuance of any building permits.

AES-3 Prior to approval of any building plans for structures over 45 feet or 3 stories in height that are within 100 feet of the Orangewood Park soccer fields, a detailed shade and shadow analysis shall be conducted to accurately inform the City and park users as to any anticipated encroachment (i.e., shade or shadow) on the park fields upon completion of the involved structure(s). The hospital shall also plan for any structures in this location to be at the minimum height necessary to minimize shade and shadow impacts on City park facilities to the extent practical. This measure shall be implemented to the satisfaction of the City Community Development Director.

Summary of Impacts. With implementation of Mitigation Measures AES-1 through AES-3, potential short-term and long-term aesthetic impacts of the Project, including views, scenic resources, and shade/shadow, will be reduced to less than significant levels.

Threshold 1.4	Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
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The Project site is currently subject to nighttime lighting associated with security lighting from the existing buildings within the QVH campus and parking lot and the adjacent lighting from the Orangewood Park located to the west of the Project site. In addition, surrounding residential, office, and commercial uses have exterior lighting, parking lot lighting, and interior lighting visible through windows and doors. Streetlights along surrounding roadways and light from motor vehicles traveling along these roadways add to nighttime lighting levels in the Project area. The proposed Project would introduce new lighting sources associated with the construction and operation of the proposed Project. Policy 1.10 of the PlanWC encourages the preservation of nighttime views within and immediately adjacent to single family residential zones, requires property owners within and directly adjacent to these zones to utilize shielding and directional lighting methods to direct lighting away from adjoining properties.

Light

Construction-Related Impacts

As further discussed in Section 4.10, *Noise*, construction activities would comply with all applicable provisions in the City's Noise Ordinance (Chapter 15, Article IV, Noise Regulations of the City's Municipal Code), which prohibits construction activity between the hours of 8:00 PM of one day and 7:00 AM of the next day, within a residential zone, or within a radius of 500 feet from a residential zone. While the hours of construction may be limited, lighting would likely be used within the construction areas (notably the construction staging areas) to provide security for construction equipment and construction materials. This type of temporary security lighting is often unshielded and may shine onto adjacent properties and roadways. Even though construction staging areas would be located as far as possible from adjacent residential uses east and northeast of the Project site, such security lighting may cause a significant impact in the form of a nuisance to the residents, resulting in a potentially significant impact prior to mitigation. Mitigation Measure AES-4 requires that construction staging areas be located as far as possible from the residential developments near the Project site to minimize light intrusion and also requires that temporary nighttime lighting that is installed for security purposes be downward facing and hooded or shielded to prevent security lighting from spilling outside the staging area or from directly broadcasting security lighting into the sky or onto adjacent residential properties. With implementation of AES-4, potential lighting impacts during construction would be reduced to less than significant levels.

Long-Term (Operational) Impacts

Although implementation of uses allowed by the Specific Plan would introduce new and more intensive development to the Project area, the Project is located in an area that is already subject to nighttime lighting both on-site (hospital buildings and associated structures, parking lots, walkways, etc.) and off-site (existing buildings, parking lots, soccer field lights, street lights, and security lighting, among others). Due to the urban nature of the Project area and surrounding areas, "sky glow", which is the illumination of the night sky from urban uses, already occurs.

As described in Section 3.0, Project Description, and further discussed in Chapter 4.5, Lighting and Chapter 5.4.2, *Secondary Development Standards* of the Specific Plan, lighting would be installed and used as necessary for safety, security, and ambience, including lighting for parking areas, pedestrian walkways, architectural, and landscape features. A hierarchy would be

established by using a variety of lighting fixtures and illumination levels based on the lighting design intent. As identified in the Specific Plan, security lighting would not cause off-site glare on neighboring uses, and exterior lighting in parking lots, service areas, and other lit areas would minimize glare outside of the Specific Plan area. As part of the design review process a comprehensive lighting plan would be prepared. Adherence to the lighting design requirements outlined in the City Municipal Code and Specific Plan would be enforced through the City's development review and permit process and would ensure that on-site development does not significantly affect adjacent uses in terms of light spillover.

Although there would be a minor increase in the amount of lighting throughout the Project site compared to the existing condition, the effect would be consistent with the type and extent of nighttime lighting in place as currently on site and in the surrounding residential and non-residential land uses. Therefore, operational lighting impacts would be less than significant, and no mitigation is required.

Glare

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. Exterior building materials that would be used at ground level to form the building base include brick, stone, tile, and pre-cast concrete. These non-reflective building materials would not result in potential glare impacts within the Project area or surrounding areas, and notably at the street level. The buildings could also create new sources of glare in the form of glazed building surfaces, use of mirrors and glass as exterior building surfaces, and other reflective materials that would reflect the sun or light sources and create glare. However, adherence to the development standards and design guidelines (architectural and landscape) outlined in the proposed Specific Plan would ensure that these materials would not result in potential glare impacts.

Summary of Impacts. Potentially construction-related lighting impacts would be reduced to a less than significant level with incorporation of Mitigation Measure AES-4 into the proposed Project. New sources of light and glare would be introduced with the proposed Project; however, adherence to the development standards and design guidelines (architectural and landscape) outlined in the Specific Plan would ensure that potential impacts related to light and glare are less than significant.

Mitigation Measures

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

Summary of Impacts. With implementation of Mitigation Measure AES-3, potential short-term lighting impacts from Project construction will be reduced to less than significant levels.

4.1.6 CUMULATIVE IMPACTS

The study area for cumulative aesthetic impacts includes areas in the same viewshed as the proposed Project. If the projects are not close to each other, the viewer would not perceive them at the same time and they would not result in a cumulative change in the visual character. There are no known cumulative projects that are within or potentially within the same viewshed as the proposed project.

All proposed projects within the same viewshed planned within this viewshed would be required to comply with the development standards and design guidelines in applicable Specific Plans and relevant standards in the jurisdictional City's zoning ordinance, as they relate to the protection of scenic resources. Notably, as part of the proposed Project, development at the QVH campus would be required to comply with development standards and design guidelines (architectural and landscape) outlined in the proposed Specific Plan. Further, design review by the jurisdictional city would continue to protect important scenic resources. No significant cumulative impacts on scenic resources would occur.

As analyzed in this section, the proposed Project would not degrade the visual character of the project site or surrounding areas. Since development in the same viewshed as the proposed Project would be required to comply with the development standards and design guidelines in applicable Specific Plans and relevant standards in the jurisdictional City's zoning ordinance, these projects would not degrade the visual quality of the Project area and would also have less than significant aesthetic impacts. Cumulative impacts related to the change in visual character would be less than significant.

As with existing development, light and glare impacts from the proposed Project and future development in the area would be reduced through the adherence to applicable lighting and design standards, as outlined in applicable Specific Plans and the zoning ordinances. Implementation of Mitigation Measure AES-4 would ensure that construction-related lighting impacts from the proposed Project would not present a considerable contribution to cumulative aesthetic impacts. Cumulative impacts related to light and glare would also be less than significant.

4.1.7 IMPACTS OF MITIGATION MEASURES

Implementation of Measures AES-1 through AES-4 may result in initial delays in Project construction until required plans are completed, but actual implementation of the measures would not themselves result in any significant environmental impacts related to aesthetics.

4.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of AES-1 through AES-4, potential aesthetics impacts of the proposed Project would be reduced to less than significant levels.

4.1.9 REFERENCES

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- . 2016a. (December). West Covina General Plan (PlanWC). City of West Covina, December 2016.
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4.2 AIR QUALITY

This section provides background information on air quality and air pollutants; presents existing emissions at the Project site and air quality in the region; and examines air quality impacts that would potentially occur during construction and operation of the proposed Project. A detailed air quality analysis was conducted for the proposed Project (see Appendix C).

The South Coast Air Quality Management District (SCAQMD) submitted a comment letter during the Notice of Preparation (NOP) period providing data and guidance on how to prepare the air quality assessment for the Project.

4.2.1 RELEVANT POLICIES AND REGULATIONS

The City of West Covina is located in the South Coast Air Basin (SoCAB). The SoCAB is comprised of parts of San Bernardino, Los Angeles, and Riverside counties and all of Orange County. Air quality in the SoCAB is regulated by the U.S. Environmental Protection Agency (USEPA), the California Air Resources Board (CARB), and the SCAQMD. Each of these agencies develops rules, regulations, policies, and/or goals to comply with applicable legislation. Although USEPA regulations may not be superseded, both State and local regulations may be more stringent. The Southern California Association of Governments (SCAG) is an important partner to the SCAQMD and produces estimates of anticipated future growth and vehicular travel in the basin that are used for air quality planning. The federal, State, regional, and local regulations for criteria air pollutants are discussed below.

Federal

U.S. Environmental Protection Agency

The USEPA is responsible for implementing the Federal Clean Air Act (FCAA), which was first enacted in 1955 and amended numerous times thereafter. The FCAA established federal air quality standards known as the NAAQS. These standards identify levels of air quality for criteria pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe (with an adequate margin of safety) to protect the public health and welfare. The NAAQS are shown in Table 4.2-1. As part of its enforcement responsibilities, the USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards.

State

California Air Resources Board

CARB, as part of the California Environmental Protection Agency (CalEPA), is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB establishes the California Ambient Air Quality Standards (CAAQS), as shown in Table 4.2-1, which are generally more stringent and apply to more pollutants than the National Ambient Air Quality Standards (NAAQS). In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates. The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. The AQMP for the SoCAB is discussed below.

**TABLE 4.2-1
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary ^a	Secondary ^b
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM10	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	–
PM2.5	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
NO ₂	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	–
SO ₂	24 Hour	0.04 ppm (105 µg/m ³)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	–
Lead	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles	No Federal Standards	
Sulfates	24 Hour	25 µg/m ³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m ³)		
O ₃ : ozone, ppm: parts per million, µg/m ³ : micrograms per cubic meter, –: No Standard; PM10: respirable particulate matter with a diameter of 10 microns or less, AAM: Annual Arithmetic Mean, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, CO: carbon monoxide, mg/m ³ : milligrams per cubic meter, NO ₂ : nitrogen dioxide, SO ₂ : sulfur dioxide, km: kilometer.				
^a <i>National Primary Standards</i> : The levels of air quality necessary, within an adequate margin of safety, to protect the public health.				
^b <i>National Secondary Standards</i> : The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.				
Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).				
Source: CARB 2016.				

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the *California Code of Regulations* [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The current applicable standards are the 2016 Standards, which went into effect on January 1, 2017 (CBSC 2016). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Since natural gas use produces criteria pollutant emissions, a reduction in natural gas

consumption results in a related reduction in air quality emissions.¹ Additional discussion of the Title 24 energy efficiency standards is included in Section 4.6, *Greenhouse Gas Emissions*.

California Green Building Code

The 2016 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen Code, contains mandatory and voluntary requirements for new residential and non-residential buildings (including buildings for retail uses, office uses, public schools, and hospitals) throughout California (CBSC 2014). Development of the CALGreen Code is intended to (1) cause a reduction in greenhouse gas (GHG) emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduces energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions. Additional discussion of the CALGreen code is included in Section 4.6, *Greenhouse Gas Emissions*.

Regional

South Coast Air Quality Management District

The SCAQMD was established in 1977 by merging the individual air pollution control districts of the four counties within the SoCAB: Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD and the SCAG, in coordination with local governments and the private sector, develop the Air Quality Management Plan (AQMP) for the SoCAB to satisfy these requirements. The AQMP is the most important air management document for the SoCAB because it provides the blueprint for meeting State and federal ambient air quality standards.

On November 28, 2007, CARB submitted a State Implementation Plan (SIP) revision to the USEPA for O₃, PM_{2.5} (1997 Standard), CO, and NO₂ in the SoCAB. This revision is identified as the “2007 South Coast SIP”. The 2007 South Coast SIP demonstrates attainment of the federal PM_{2.5} standard in the SoCAB by 2014 and attainment of the federal 8-hour O₃ standard by 2023. This SIP also includes a request to reclassify the O₃ attainment designation from “severe” to “extreme”. The USEPA approved the redesignation effective June 4, 2010. The “extreme” designation requires the attainment of the 8-hour O₃ standard in the SoCAB by June 2024. CARB approved PM_{2.5} SIP revisions in April 2011 and the O₃ SIP revisions in July 2011. The USEPA approved the PM_{2.5} SIP on September 25, 2013 and has approved 47 of the 62 1997 8-hour O₃ SIP requirements. On November 30, 2014, the USEPA proposed a finding that the SoCAB has attained the 1997 PM_{2.5} standards (USEPA 2014). The comment period closed on January 22, 2015; no subsequent action has been taken.

¹ Because electricity is not generated on site, the emissions associated with electricity generation are not included in the emissions calculations.

On September 30, 2015, the USEPA proposed to approve elements of the South Coast 2012 PM2.5 Plan and 2015 Supplement, which addresses Clean Air Act requirements for the 2006 PM2.5 NAAQS and proposed to reclassify the area as a 'serious' nonattainment area for the 2006 PM2.5 standard. The reclassification is based on the determination that the area cannot practicably attain the 2006 PM2.5 NAAQS by the moderate area attainment date (December 31, 2015). On December 22, 2015, the USEPA reclassified the South Coast area as a "Serious" nonattainment area for the 2006 PM2.5 standard. The final reclassification requires the State to submit a "serious area" plan that provides for attainment of the 2006 PM2.5 NAAQS as expeditiously as practicable as and no later than December 31, 2019 (USEPA 2016b).

On March 3, 2017, the SCAQMD adopted the 2016 AQMP, which is a regional and multi-agency effort (SCAQMD, CARB, Southern California Association of Governments [SCAG], and USEPA). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards. For a project to be consistent with the AQMP, the pollutants emitted from the project should not (1) exceed the SCAQMD CEQA air quality significance thresholds or (2) conflict with or exceed the assumptions in the AQMP.

South Coast Air Quality Management District Rules

The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. The following rules are most relevant to the proposed Project.

SCAQMD Rule 403, Fugitive Dust, requires actions to prevent, reduce or mitigate fugitive particulate matter emissions. These actions include applying water or chemical stabilizers to disturbed soils; managing haul road dust by applying water; covering all haul vehicles before transporting materials; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, Rule 403 requires that vegetative ground cover be established on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the volatile organic compound (VOC) content in paints and paint solvents. Although this rule does not directly apply to the Project, it does dictate the VOC content of paints available for use during building construction.

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, economy, community development, and environment. SCAG serves as the federally designated Metropolitan Planning Organization (MPO) for the Southern California region. On April 4, 2012, SCAG adopted the 2012–2035 RTP/SCS, which includes a strong commitment to reduce emissions from transportation sources in order to improve public health; meet the NAAQS as set forth by the FCAA; and comply with Senate Bill (SB) 375. SCAG addresses this commitment by ensuring that the RTP meets the Transportation Conformity requirements of the Federal Clean Air Act. New to this RTP, SB 375 states that RTPs must include

an SCS that reduces GHG emissions from passenger vehicles by 8 percent per capita by 2020 and 13 percent per capita by 2035 compared to 2005 emissions levels. The 2012–2035 RTP/SCS is further discussed in Section 4.6, *Greenhouse Gas Emissions*, and Section 4.9, *Land Use and Planning*.

Local

West Covina General Plan

The “Our Natural Community” Section, sub-section Air, contains the following policies and actions regarding air quality:

Policy 1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

Action 1.1 Continue to channel Federal, State and Local transportation funds to programs, and infrastructure improvements that reduce air pollution through the promotion of walking, biking, ride-sharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.

Policy 1.3 Minimize the adverse impacts of growth and development on air quality and climate.

Action 1.3 Prepare and adopt a plan to reduce greenhouse gases as part of the Environmental Impact Report (to be concurrently approved with the West Covina General Plan) to achieve compliance with State mandates, and consistency with the Regional Transportation Plan/Sustainable Community Strategy to facilitate development by streamlining the approval process, and to improve air quality.

The Project’s consistency with these policies and actions will be evaluated in Table 4.2-11 in Section 4.2.5, *Environmental Impacts*.

West Covina Municipal Code/Zoning

The City’s Municipal Code does not contain any ordinances or regulations directly aimed at controlling air pollutant emissions from existing land uses, although it does regulate grading and other dust-generating activities.

4.2.2 METHODS

Emissions Calculation Methods

Construction and Operational Mass Daily Emissions

Construction and operational emissions for the Project were calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. CalEEMod is a computer program prepared under the direction of the SCAQMD and used to estimate anticipated emissions associated with land development projects in California. CalEEMod calculates emission rates for criteria pollutants utilizing the Emission Factor (EMFAC) for on-road vehicles, OFFROAD for off-road vehicles, and USEPA formulas for non-vehicular emissions. The model calculates emissions of CO, SO_x, PM₁₀, PM_{2.5}, and the O₃ precursors VOC and NO_x. The San Bernardino County database was used for the proposed Project.

Specific inputs to CalEEMod for both construction and operations include land uses and acreages associated with the proposed Project. Construction input data include, but are not limited to, the start and finish dates of construction phases; inventories of construction equipment to be used during each phase; volumes of materials to be imported to and exported from the site; areas to be paved; and areas to be painted. Output emissions data are specified for off-road equipment, on-road vehicles, fugitive dust, and VOCs from painting and asphalt installation.

Operational inputs include the year of analysis, vehicle trip generation rates, and projected natural gas use. Output operational emissions include area, energy, and mobile sources. The area sources include use of consumer products, landscape maintenance equipment, and architectural coatings used for routine maintenance. Energy emissions refer to natural gas consumption. Mobile sources are the vehicles used by residents, retail and non-residential use employees, customers, and vendors traveling to and from the Project site. The mobile source emissions were derived from trip generation forecasts for the proposed Project provided in the Traffic Impact Analysis for the Project (Psomas 2018). Specific data inputs are further discussed in Section 4.2.5.

The CalEEMod model includes methods and data to calculate emissions reductions resulting from the implementation of State and SCAQMD rules, project design features, and mitigation measures. Please refer to Appendix C of this Program EIR for detailed information on CalEEMod input assumptions and modeling output files.

Determinations of significance for construction and operational emissions were calculated by comparing project-generated emissions and applicable SCAQMD mass emissions thresholds.

Localized Concentrations of Criteria Pollutants

As part of the SCAQMD's recent emphasis on environmental justice, attention has focused on localized air pollutant effects on disadvantaged communities. In addition to the mass daily emissions for regional thresholds, the SCAQMD has established CEQA significance thresholds for ambient air quality to address localized impacts. The localized impact analysis is based on the concentration of a pollutant at a receptor site. The concentration standard is either the same as the NAAQS or CAAQS or is based upon a health-based standard. It is possible for a pollutant to have a significant impact regionally and a less than significant impact locally or vice versa. It is also possible for both impacts (i.e., regional and local) to be significant or less than significant.

The localized effects from the onsite portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance threshold (LST) method, which utilizes onsite mass emissions rate look-up tables and project-specific modeling, where appropriate (SCAQMD 2008c). Analysis of LSTs is applicable to NO₂, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area (SRA)² and for distance to the nearest sensitive receptor.

The mass rate look-up tables were developed for each SRA and can be used to determine whether or not a project may generate significant adverse localized air quality impacts (i.e., LST impacts) (SCAQMD 2009). The SCAQMD provides LST mass rate look-up tables for projects that are less than or equal to five acres. For projects that exceed five acres, such as the proposed Project, the five-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis (MacMillan 2011). This approach is conservative as it

² The SCAQMD has divided the SoCAB into 38 air-monitoring areas, called Source Receptor Areas.

assumes that all onsite emissions would occur within a five-acre area and would overpredict potential localized impacts (i.e., more pollutant emissions occurring in a smaller area and within closer proximity to potential sensitive receptors). If a project exceeds the LST look-up values, then the SCAQMD recommends that project-specific localized air quality modeling be performed.

4.2.3 EXISTING SETTING

Climate

The climate in and around the City of West Covina, as with all of Southern California, is controlled largely by the strength and position of the subtropical high-pressure cell over the Pacific Ocean. It maintains moderate temperatures and comfortable humidity, and limits precipitation to a few storms during the winter “wet” season. Temperatures are normally mild, except in the summer months, which commonly bring substantially higher temperatures. In all portions of the basin, temperatures well above 100 degrees Fahrenheit (°F) have been recorded in recent years. The annual average temperature in the basin is approximately 62°F.

Winds in the Project area are usually driven by the dominant land/sea breeze circulation system. Regional wind patterns are dominated by daytime onshore sea breezes. At night, the wind generally slows and reverses direction traveling towards the sea. Southern California frequently has temperature inversions that inhibit the dispersion of pollutants. Inversions may be either ground based or elevated. Ground-based inversions (sometimes referred to as “radiation inversions”) are most severe during clear, cold, early winter mornings. Under ground-based inversion conditions, very little mixing or turbulence occurs, and high concentrations of primary pollutants may occur close to major roadways. Elevated inversions can be generated by a variety of meteorological phenomena. Elevated inversions act as a lid or upper boundary and restrict vertical mixing. Below the elevated inversion, dispersion is not restricted. Mixing heights for elevated inversions are lower in the summer and more persistent. This low summer inversion puts a lid over the SoCAB and is responsible for the high levels of O₃ observed during summer months in the air basin (SCAQMD 2018).

Criteria Air Pollutants

The USEPA defines seven “criteria” air pollutants: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter with a diameter of 10 microns or less (PM₁₀), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), and lead. These pollutants are called criteria pollutants because the USEPA has established NAAQS for the concentrations of these pollutants. The CARB has also established standards for the criteria pollutants, known as CAAQS, and the State standards are generally more restrictive than the NAAQS. When a region has air quality that fails to meet the standards, the USEPA and the CARB designate the region as “nonattainment”, and the regional air quality agency must develop plans to attain the standards. A brief explanation of each criteria pollutant and their health effects is presented below.

Ozone (O₃)

O₃ is a secondary pollutant; it is not directly emitted. O₃ is formed by chemical reactions between volatile organic compounds (VOCs, also referred to as reactive organic gasses [ROGs]) and nitrogen oxides (NO_x), which occur only in the presence of bright sunlight. VOC/ROG emissions are generally unburned hydrocarbons that are a result of motor vehicle travel and other combustion sources. Nitrogen oxides are also a result of the combustion process, most notably due to the operation of motor vehicles. Sunlight and hot weather cause ground-level O₃ to form.

(Not to be confused with the “ozone layer” which occurs very high in the atmosphere and shields the planet from some ultraviolet [UV] rays.) As a result, O₃ is known as a summertime air pollutant. Ground-level ozone is the primary constituent of smog. Because ground-level ozone is formed in the atmosphere, high concentrations can occur in areas well away from sources of its constituent pollutants.

People with lung disease, children, older adults, and people who are active are the most sensitive when O₃ levels are unhealthy. Numerous scientific studies have linked ground-level O₃ exposure to a variety of health problems, including the following:

- lung irritation that can cause inflammation much like a sunburn;
- wheezing, coughing, pain when taking a deep breath, and breathing difficulties during exercise or outdoor activities;
- permanent lung damage to those with repeated exposure to O₃ pollution; and
- aggravated asthma, reduced lung capacity, and increased susceptibility to respiratory illnesses like pneumonia and bronchitis.

Ground-level O₃ can also have detrimental effects on plants and ecosystems. These effects include the following:

- interfering with the ability of sensitive plants to produce and store food, making them more susceptible to certain diseases, insects, other pollutants, competition, and harsh weather;
- damaging the leaves of trees and other plants, negatively impacting the appearance of urban vegetation, national parks, and recreation areas; and
- reducing crop yields and forest growth, potentially impacting species diversity in ecosystems.

Currently, the SoCAB is designated as a “nonattainment area” for the State and federal O₃ standards.

Particulate Matter (PM10 and PM2.5)

Particulate matter includes both aerosols and solid particles of a wide range of size and composition. Of particular concern are inhalable particulate matter, which are those particles equal to or smaller than 10 microns in size (PM10) and fine particulate matter, which are particles smaller than or equal to 2.5 microns (PM2.5). The size of the particulate matter refers to the aerodynamic diameter of the particulate. Smaller particulates are of greater concern because they can penetrate deeper into the lungs than large particles. PM2.5 is directly emitted in combustion exhaust and fugitive dust and is formed from atmospheric reactions between various gaseous pollutants, including NO_x, SO_x, and VOCs. PM10 is directly emitted as a result of mechanical processes that crush or grind larger particles or from the re-suspension of dusts most typically through construction activities and vehicular travels. PM10 and PM2.5 can remain suspended in the atmosphere for days and/or weeks and can be transported long distances.

The principal health effects of airborne particulate matter are on the respiratory and cardiac systems. According to the USEPA, some people are more sensitive than others to breathing fine particles (USEPA 2017). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles.

Children may experience decline in lung function due to breathing in PM₁₀ and PM_{2.5}. Other groups considered sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive, because many breathe through their mouths. However, all people exposed to elevated levels of particulate matter may experience temporary health effects (USEPA 2016a).

Short-term exposure to high PM_{2.5} levels is associated with premature mortality and increased hospital admissions and emergency room visits. Long-term exposure to high PM_{2.5} levels is associated with premature mortality and development of chronic respiratory disease. Short-term exposure to high PM₁₀ levels is associated with hospital admissions for cardiopulmonary diseases, increased respiratory symptoms, and possible premature mortality.

There are national and State 24-hour PM₁₀ standards, but there is no annual long-term standard. With respect to long-term PM₁₀ health effects, the USEPA concluded in a 2006 standards review that analysis of air quality data showed that the 24-hour PM₁₀ standard generally resulted in annual average PM₁₀ levels at or below the annual standard of 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and that available evidence did not suggest an association between long-term exposure to PM₁₀ at 2006 ambient levels and health problems. Based on this conclusion, the national PM₁₀ annual standard was revoked (USEPA 2006). However, California maintains an annual PM₁₀ standard.

Currently, PM₁₀ levels in the SoCAB are designated as “nonattainment areas” for State standards and “attainment/maintenance areas” for federal standards. PM_{2.5} levels in the SoCAB are designated as “nonattainment areas” for State and federal standards.

Carbon Monoxide (CO)

CO is a colorless and odorless gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions. Carbon monoxide concentrations can vary greatly over comparatively short distances. Relatively high concentrations are typically found near crowded intersections; along heavily used roadways carrying slow moving traffic; and at or near ground level. Even under the most severe meteorological and traffic conditions, high CO concentrations are limited to locations within a relatively short distance (i.e., up to 600 feet or 185 meters) of heavily traveled roadways. Overall, CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. Currently, CO levels in the SoCAB are in attainment for State and federal one-hour and eight-hour standards.

Nitrogen Dioxide (NO₂)

Nitrogen gas, normally relatively inert (unreactive), comprises about 80 percent of the air. At high temperatures (i.e., in the combustion process) and under certain other conditions, it can combine with oxygen to form several different gaseous compounds collectively called nitrogen oxides (NO_x). Nitrogen monoxide (NO) is converted to NO₂, a red-brown pungent gas, in the atmosphere. Motor vehicle emissions are the main source of NO_x in urban areas. NO₂ is toxic to various animals and to humans. Its toxicity relates to its ability to form nitric acid with water in the eye, lung, mucus membrane, and skin. In animals, long-term exposure to NO_x increases susceptibility to respiratory infections lowering their resistance to such diseases as pneumonia and influenza. Laboratory studies show susceptible humans, such as asthmatics, exposed to high

concentrations of NO₂ can suffer lung irritation and, potentially, lung damage. Epidemiological studies have also shown associations between NO₂ concentrations and daily mortality from respiratory and cardiovascular causes and with hospital admissions for respiratory conditions.

NO_x is primarily a combination of NO and NO₂. While the NAAQS and CAAQS only address NO₂, the total group of nitrogen oxides is of concern. NO and NO₂ are both precursors in the formation of O₃ and PM_{2.5}. Because of this and the fact that NO emissions largely convert to NO₂, NO_x emissions are typically examined when assessing potential air quality impacts. Currently, NO₂ levels in the SoCAB are in attainment for State and federal standards.

Sulfur Dioxide (SO₂)

Sulfur oxides (SO_x) constitute a class of compounds of which SO₂ and sulfur trioxide (SO₃) are included. Ninety-five percent of pollution-related SO_x emissions are in the form of SO₂. SO_x emissions are typically examined when assessing potential air quality impacts of SO₂. Combustion of fossil fuels for generation of electric power is the primary contributor of SO_x emissions. Industrial processes, such as nonferrous metal smelting, also contribute to SO_x emissions. SO_x is also formed during combustion of motor fuels. However, most of the sulfur has been removed from fuels, greatly reducing SO_x emissions from vehicles.

SO₂ combines easily with water vapor, forming aerosols of sulfurous acid (H₂SO₃), a colorless, mildly corrosive liquid. This liquid may then combine with oxygen in the air, forming the even more irritating and corrosive sulfuric acid (H₂SO₄). Peak levels of SO₂ in the air can cause temporary breathing difficulty for people with asthma who are active outdoors. Longer-term exposures to high levels of SO₂ gas and particles cause respiratory illness and aggravate existing heart disease. SO₂ reacts with other chemicals in the air to form tiny sulfate particles which are measured as PM_{2.5}. SO₂ is monitored at several sites in the SoCAB, and the SoCAB is in attainment for the State and federal SO₂ standards.

Lead

Lead is a stable compound, which persists and accumulates both in the environment and in animals. In humans, it affects the blood-forming (or hematopoietic), the nervous, and the renal systems. In addition, lead has been shown to affect the normal functions of the reproductive, endocrine, hepatic, cardiovascular, immunological, and gastrointestinal systems, although there is significant individual variability in response to lead exposure. Since 1975, lead emissions have been in decline due in part to the introduction of catalyst-equipped vehicles and the decline in production of leaded gasoline. In general, an analysis of lead is limited to projects that emit significant quantities of the pollutant (e.g., lead smelters, battery manufacturers, and battery recyclers) and are not undertaken for transportation, residential, or commercial development projects. The SoCAB is in attainment for the State lead standard. The Los Angeles County portion of the SoCAB is classified nonattainment for the federal lead standard; the remainder of the SoCAB is in attainment of the State and federal standards for lead.

Visibility Reducing Particles

Visibility reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consist of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. The State standard is intended to limit the frequency and severity of visibility impairment due to regional

haze. The SoCAB is “unclassified” for this pollutant. There are no federal standards for visibility reducing particulates.

Sulfates (SO₄)

Sulfates (SO₄) are the fully oxidized ionic form of sulfur. SO₄ occurs in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO₂ during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO₂ to SO₄ takes place comparatively rapidly and completely in California urban areas due to regional meteorological features.

The CARB's SO₄ standard is designed to prevent aggravation of respiratory symptoms. Effects of SO₄ exposure at levels above the standard include a decrease in respiratory function; aggravation of asthmatic symptoms; and an increased risk of cardiopulmonary disease. SO₄ is particularly effective in degrading visibility and, due to fact that it is usually acidic, can harm ecosystems and damage materials and property. The SoCAB is in attainment for the State SO₄ standard.

Ambient Air Quality

The long-term trend of Southern Californian's air quality shows continuous improvement, although the slowing rate of improvement in ozone levels causes concern. However, the air in Southern California is far from meeting all federal and state air quality standards and, in fact, is among the worst in the nation (SCAQMD 2013a). The total number of days on which the Basin experiences high ozone levels has decreased dramatically over the last two decades. The majority of exceedances occur in the mountains and valleys of Southwestern San Bernardino County, which is “downwind” of the more urbanized areas of Los Angeles and Orange Counties. The overall result is that the SCAQMD 2016 AQMP determined that a strategy focused primarily on NOx reductions has been deemed the best way to achieve long-term ozone attainment objectives. NOx reductions are needed not only to achieve the ozone standards but also to achieve the PM2.5 standards. The SCAG 2012 RTP/SCS estimates that NOx emissions will need to be reduced by approximately two-thirds in 2023 and three-quarters in 2030.

The SCAQMD has divided the SoCAB into 38 air-monitoring areas (SRAs), with a designated ambient air monitoring station representative of each area. The Project site is in the area represented by measurements made at the Pico Rivera and Azusa Monitoring Stations. The monitored air quality data from 2015 to 2017, and a comparison to the NAAQS and CAAQS, are presented in Table 4.2-2. As shown, the national and State standards were exceeded in all three years for O₃ (8-hour), State standards were exceeded in all three years for O₃ (1-hour), and the Federal annual standard for PM2.5 was also exceeded in all three years.

CARB, a part of the CalEPA, is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research; sets the CAAQS, as shown in Table 4.2-1, *California and Federal Ambient Air Quality Standards*; compiles emission inventories; develops suggested control measures; oversees local programs; and prepares the State Implementation Plan (SIP). For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the State SIP. CARB establishes emissions standards for (1) motor vehicles sold in California; (2) consumer products (e.g., hair spray, aerosol paints, barbecue lighter fluid); and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

As indicated above, O₃ is a secondary pollutant, created when nitrogen oxides (NO_x) and VOCs react in the presence of sunlight. The predominant source of air emissions generated by Project development would be from vehicle emissions. Motor vehicles primarily emit CO, NO_x, and VOCs. The NAAQS and CAAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. The NAAQS and CAAQS for O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead are shown in Table 4.2-2.

**TABLE 4.2-2
LOCAL AIR POLLUTION LEVELS**

Pollutant	California Standard	National Standard	Year	Maximum Level ^a	Days State Standard Exceeded	Days National Standard Exceeded
Pico Rivera Monitoring Station Data						
O ₃ (1 hour)	0.09 ppm	None	2015	0.107	6	0
			2016	0.111	9	0
			2017	0.118	7	0
O ₃ (8 hour)	0.070 ppm	0.070 ppm	2015	0.082	11	11
			2016	0.081	6	6
			2017	0.087	9	9
PM10 (24 hour)	50 µg/m ³	150 µg/m ³	2015	–	–	–
			2016	–	–	–
			2017	–	–	–
PM10 (AAM)	20 µg/m ³	None	2015	–	–	–
			2016	–	–	–
			2017	–	–	–
NO ₂ (1 Hour)	0.18 ppm	0.100 ppm	2015	0.070	0	0
			2016	0.063	0	0
			2017	0.075	0	0
PM2.5 (24 Hour)	None	35 µg/m ³	2015	52.7	N/A	3
			2016	46.5	N/A	2
			2017	49.5	N/A	1
CO (1-hour)	20 ppm	20 ppm	2015	2.8	0	0
			2016	2.8	0	0
			2017	--	--	--
CO (8-hour)	9 ppm	9 ppm	2015	1.7	0	0
			2016	1.7	0	0
			2017	--	--	--
Azusa Monitoring Station Data						
PM2.5 (24-Hour)	None	35 µg/m3	2015	70.3	0	6
			2016	32.1	0	0
			2017	24.9	0	0
–: Data Not Reported or insufficient data available to determine the value; O ₃ : ozone; ppm: parts per million; PM10: respirable particulate matter with a diameter of 10 microns or less; µg/m ³ : micrograms per cubic meter; AAM: Annual Arithmetic Mean; NO ₂ : nitrogen dioxide; CO: carbon monoxide; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; SO ₂ : sulfur dioxide. N/A indicates that there is no applicable standard.						
^a California maximum levels were used.						
Source: CARB 2018, SCAQMD 2018.						
(Table 1, <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)						

Attainment Status

Based on monitored air pollutant concentrations, the USEPA and CARB designate an area's status in attaining the NAAQS and the CAAQS, respectively, for selected criteria pollutants. These attainment designations for the SoCAB are shown in Table 4.2-3. As shown, the SoCAB is a nonattainment area for PM10 (State), PM2.5 (State and Federal), and O₃ (State and Federal).

**TABLE 4.2-3
ATTAINMENT STATUS OF CRITERIA POLLUTANTS
IN THE SOUTH COAST AIR BASIN**

Pollutant	State	Federal
O ₃ (1 hour)	Nonattainment	No standard
O ₃ (8 hour)		Extreme Nonattainment
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment ^a	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Attainment ^b	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment
All others	Attainment/Unclassified	No standards

O₃: ozone; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO₂: nitrogen dioxide; SO₂: sulfur dioxide; USEPA: U.S. Environmental Protection Agency; SoCAB: South Coast Air Basin; CARB: California Air Resources Board.

^a On November 30, 2014, the USEPA proposed a finding that the SoCAB has attained the 1997 PM2.5 standards. If approved, the SoCAB would remain a nonattainment area for the 2006 PM2.5 standard.

^b CARB Executive Order R-14-001 (February 25, 2014) reclassified the SoCAB to "attainment" for NO₂ and lead. The redesignation was effective July 1, 2014.

Source: CARB 2014ba, 2014b. USEPA 2014a.
(Table 2, *Air Quality and Greenhouse Gas Emissions Analysis*, Psomas 2018)

Sensitive Receptors

Sensitive receptors include, but are not limited to children, the elderly, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. The West Covina General Plan identifies the following land uses as sensitive receptors for air quality: schools, hospitals, and residential uses. Being a hospital, patients within the Project site itself are considered sensitive receptors. The closest off-site receptor to the Project site is the multi-family apartment complex (i.e., Torrey Pines Apartment Homes) directly adjacent to the Project site to the northeast off of Sunset Avenue. The next closest sensitive receptors would be the single-family residential uses northwest of the site across the Walnut Creek Channel, and the Edgemont Middle School and High School located southwest across Merced Avenue.

4.2.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- 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).
- Expose sensitive receptors to substantial pollutant concentrations.
- Would the project create objectionable odors affecting a substantial number of people?

The SCAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions. These significance thresholds are updated as needed to appropriately represent the most current technical information and attainment status in the SoCAB. The City of West Covina uses the current SCAQMD thresholds to determine whether a proposed project would have a significant impact.

Table 4.2-4 presents the current SCAQMD significance thresholds, including regional daily thresholds for short-term construction and long-term operational emissions; maximum incremental cancer risk and hazard indices for TACs; and maximum ambient concentrations for exposure of sensitive receptors to localized pollutants. A project with daily emission rates, risk values, or concentrations below these thresholds is generally considered to have a less than significant effect on air quality.

**TABLE 4.2-4
SCAQMD CRITERIA POLLUTANT SIGNIFICANCE THRESHOLDS**

Mass Daily Thresholds ^a		
Pollutant	Construction	Operation
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Ambient Air Quality Standards for Criteria Pollutants ^{b, c}		
NO ₂ 1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	10.4 µg/m ³ (construction) ^c & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM2.5 24-hour average	10.4 µg/m ³ (construction) ^c & 2.5 µg/m ³ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20.0 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	
NOx: nitrogen oxides, lbs/day: pounds per day, VOC: volatile organic compound, PM10: respirable particulate matter with a diameter of 10 microns or less, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, SOx: sulfur oxides, CO: carbon monoxide, TACs: toxic air contaminants, GHG: greenhouse gases, MT/yr CO ₂ eq: metric tons per year of CO ₂ equivalents, NO ₂ : nitrogen dioxide, ppm: parts per million, µg/m ³ : micrograms per cubic meter.		
^a Source: SCAQMD CEQA Handbook (SCAQMD 1993)		
^b Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.		
^c Ambient air quality threshold is based on SCAQMD Rule 403.		
Source: SCAQMD 2015c.		

4.2.5 ENVIRONMENTAL IMPACTS

Threshold 2.1	Would the project conflict with or obstruct implementation of the applicable air quality plan?
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The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. It is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources and has prepared an Air Quality Management Plan (AQMP) that establishes a program of rules and regulations directed at attaining the NAAQS and CAAQS.

As stated above, the SCAQMD adopted the 2016 AQMP on March 3, 2017 (SCAQMD 2017b). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts.

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

Construction and operations phase regional emissions are assumed to occur throughout the geographic region covered by the AQMP. As described in response to Threshold 2-2, both the construction and operational phase emissions for this Project are below the SCAQMD's regional emissions thresholds with the implementation of Mitigation Measures AIR-1 through AIR-3. As such, the air pollutant emissions generated by the Project are consistent with the first criterion of not exceeding the SCAQMD CEQA air quality significance thresholds.

For the second criterion, the Project requires a General Plan Amendment to change the "Parks and Recreation" designation on former Sunset Fields to "Commercial", consistent with the Specific Plan. A Zone Change from "MF-20 – Residential 20 du/ac" to "Specific Plan" on the City's zoning map would also be included as part of the Project. It is anticipated that the multi-family residential uses (MF-20) under the current zoning would actually generate more vehicular and energy-related emissions compared to the mixed office and hospital uses proposed by the Project. The proposed Project is planned to provide and meet existing and future medical services and facilities needs for residents of San Gabriel Valley. Provision of these services locally would reduce the need for residents to travel further to meet their medical needs. The reduction in travel length for vehicles would likewise have benefits for air quality emissions. Therefore, this impact would be less than significant.

Summary of Impacts. The Project would be consistent with the SCAQMD's 2016 AQMP, as long-term emissions of nonattainment pollutants would not exceed SCAQMD significance thresholds. Therefore, impacts are less than significant and no mitigation is required.

Threshold 2.2	Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
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The proposed Project would generate air pollutant emissions from (1) demolition of onsite asphalt pavement and buildings; (2) onsite grading activities; (3) construction of hospital uses, medical office buildings, and parking structures; (4) paving of surface parking lots; (5) emissions generated from emergency generators; and (6) new vehicle trips coming to and from the Project site. As stated previously, Project construction would be staged in five phases: Immediate Improvements (2019), Phase 1A (2020–2022), Phase 1B (2020–2022), Phase 2 (2022–2026), and Long Range Improvements (2028+).

A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The SCAQMD has developed construction and operation thresholds to determine whether projects would potentially contribute to a violation of ambient air quality standards.

A project with daily emission rates below the SCAQMD's established air quality significance thresholds (shown in Table 4.2-4) would have a less than significant effect on regional air quality. Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program (CAPCOA 2017). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and region-specific information. For air quality modeling purposes, construction of the Project was modeled to begin in 2019 and end in 2029. The CalEEMod input for construction emissions was based on the Project's construction assumptions and default assumptions derived from CalEEMod. The input for operational emissions was based on the vehicle trip generation rates provided in the traffic impact analysis and the proposed building square footage. Additional input details are included in Attachment A of Appendix C of this Program EIR.

Construction impacts would occur within the Project site boundaries. Construction staging would be located on the Project site. The input for operational emissions was based on the vehicle trip generation rate provided in the traffic impact analysis and the building area. Additional input details are included in Attachment A of Appendix C of this Program EIR.

Construction Emissions

Air pollutant emissions would occur from construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling demolition and construction debris, soil, and building materials to and from the Project site and from vehicles driven to and from the Project site by construction workers; and VOCs from painting and asphalt paving operations. The proposed Project would comply with applicable SCAQMD rules and regulations, including Rule 403 for fugitive dust control and Rule 1113 for architectural coatings. Rule 403 measures include regular watering of active grading areas and unpaved roads, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions (SCAQMD 1976). Watering of active grading areas is included in the CalEEMod emissions analysis and results in reduced PM10 and PM2.5 emissions. It should be noted that some Project requirements and features, such as watering grading areas, although required, are shown in the CalEEMod format as mitigation measures. SCAQMD Rule 1113 limits the VOC content of architectural coatings (SCAQMD 1977). The emission reductions associated with compliance with this rule have been included in the emissions calculations.

Regional Emissions Thresholds – Maximum Daily Regional Emissions

Table 4.2-5, *Maximum Daily Regional Construction Emissions Without Mitigation*, presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As stated above, Project construction would occur in five phases: Immediate Improvements (2019), Phase 1A (2020–2022), Phase 1B (2020–2022), Phase 2 (2022–2026), and Long Range Improvements (2028+). For the purposes of this analysis, the Long Range Improvements phase was assumed to take two years, from early 2028 through the end of 2029.

**TABLE 4.2-5
MAXIMUM DAILY REGIONAL CONSTRUCTION
EMISSIONS WITHOUT MITIGATION**

Year	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM10	PM2.5
2019	4	46	23	<1	8	5
2020	13	127	67	<1	25	15
2021	6	53	53	<1	7	3
2022	39	95	106	<1	15	8
2023	3	21	24	<1	4	2
2024	2	20	24	<1	4	2
2025	2	19	23	<1	4	2
2026	16	19	23	<1	4	2
2028	3	25	21	<1	8	5
2029	106	17	21	<1	3	1
Maximum	106	127	106	<1	25	15
SCAQMD Thresholds (Table 4)	75	100	550	150	150	55
Exceeds SCAQMD Thresholds?	Yes	Yes	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compound; NO _x : nitrogen oxides; CO: carbon monoxide; SO _x : sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. Source: SCAQMD 2015 (thresholds); see Attachment A for CalEEMod model outputs. (Table 5, <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)						

As shown in Table 4.2-5, Project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants except for VOC and NO_x emissions. VOC emissions during the Long Range Improvements would exceed thresholds in 2029, and therefore, implementation of Mitigation Measure AIR-1 is proposed to reduce impacts to less than significant by requiring the use of paints that have a VOC content of 10 grams/Liter (g/L) or less for all architectural coating activities during the Long Range Improvements Phase. To reduce NO_x without reducing the quantity or operating hours of construction equipment, which would extend the duration of the construction activities, equipment with newer, low-emission engines should be used. Mitigation Measure AIR-2 requires the use of construction equipment with Tier 3 diesel engines. Mitigated Project emissions generated with the use of Tier 3 Final-compliant construction equipment and paints with a VOC content of 10 g/L or less during the Long Range Improvements Phase are shown in Table 4.2-6, *Maximum Daily Regional Construction Emissions With Mitigation*. As shown in Table 4.2-6, all Project-related emissions would be below the regional significance thresholds with the implementation of Mitigation Measures AIR-1 and AIR-2. As such,

regional impacts associated with Project-related construction emissions would be less than significant with mitigation.

Mitigation Measures

- AIR-1** During construction of the Long Range Improvements Phase of the Project, the Hospital shall use paints that have a volatile organic compound (VOC) content of 10 grams/Liter (g/L) or less for all architectural coating activities.
- AIR-2** During all construction phases of the Project, all off-road diesel-powered construction equipment that is greater than or equal to 50 horsepower shall be required to meet or exceed U.S. Environmental Protection Agency (USEPA) Tier 3 emission standards.

**TABLE 4.2-6
MAXIMUM DAILY REGIONAL CONSTRUCTION
EMISSIONS WITH MITIGATION**

Year	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2019	4	26	26	<1	8	5
2020	4	60	75	<1	25	15
2021	4	46	56	<1	7	3
2022	38	91	117	<1	15	8
2023	2	21	26	<1	4	2
2024	2	21	26	<1	4	2
2025	2	20	25	<1	4	2
2026	16	20	25	<1	4	2
2028	1	19	25	<1	8	5
2029	11	19	23	<1	3	1
Maximum	38	91	117	<1	25	15
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds SCAQMD Thresholds?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. Source: SCAQMD 2015 (thresholds); see Attachment A for CalEEMod outputs. (Table 6, <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)						

Construction-Phase Localized Significance Thresholds

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term local impacts to nearby sensitive receptors from onsite emissions of NO₂, CO, PM10, and PM2.5 are examined based on SCAQMD's LST methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts.

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

for 24 hours for PM10 and PM2.5 exposure. The emissions limits in the lookup tables are based on the SCAQMD's Ambient Air Quality Standards (SCAQMD 2016). The closest receptors to the Project site are the patients using the existing hospital facilities. The emissions thresholds are for receptors within 25 meters (82 feet)³ of the Project site for CO and NOx due to the short exposure period and at actual distances from each Project phase to offsite residential uses for the 24-hour exposure period of PM10 and PM2.5. The thresholds for receptors farther away would be higher and the Project emissions would be a smaller fraction of the thresholds.

Table 4.2-7, *Construction-Phase Localized Significance Threshold Emissions*, shows the maximum daily onsite emissions for construction activities compared with the SCAQMD LSTs. As shown in Table 4.2-7, localized emissions would not exceed the applicable thresholds for NOx, CO, PM10, and PM2.5. This impact would be less than significant with Mitigation Measures AIR-1 and AIR-2.

**TABLE 4.2-7
CONSTRUCTION-PHASE LOCALIZED
SIGNIFICANCE THRESHOLD EMISSIONS**

Project Maximum Daily Onsite Emissions per Phase	Emissions (lbs/day)			
	NOx	CO	PM10	PM2.5
Immediate Development (2019)	19	25	8	5
Localized Significance Threshold	102	852	23	8
Exceeds threshold?	No	No	No	No
Phases 1A, 1B, and 2 (2020-2026)	30	37	8	5
Localized Significance Threshold	183	1,814	48	14
Exceeds threshold?	No	No	No	No
Long Range Improvements (2028+)	19	25	8	5
Localized Significance Threshold	102	852	23	8
Exceeds threshold?	No	No	No	No
lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter. Note: Data is for SCAQMD Source Receptor Area 11, South San Gabriel Valley. Source: SCAQMD 2009 (thresholds); see Attachment A for CalEEMod model outputs. (Table 7, <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)				

Operational Emissions

The ongoing operation of the Hospital with Project improvements would result in a long-term increase in air quality emissions. This increase would be due to emissions from Project-generated vehicle trips, energy consumption, and through operational emissions from the ongoing use of the Project. The following section provides an analysis of potential long-term air quality impacts to regional and local air quality with the long-term operation of the Hospital's expanded uses under the proposed Project. The potential operations-related air emissions have been analyzed below for the regional and local criteria pollutant emissions and cumulative impacts.

³ The SCAQMD recommends that, when sensitive receptors are located nearer than 25 meters (82 feet) from the Project site, the minimum 25 meter/82 foot distance threshold should be used.

Criteria Pollutant Analysis

Operational emissions are comprised of area, energy, and mobile source emissions. The principal area source of VOC emissions associated with the Project would result from the use of consumer products, and the major area source of CO emissions would be from the landscaping equipment. Area and energy source emissions are based on CalEEMod assumptions for the specific land uses and size. Mobile source emissions are based on estimated Project-related trip generation forecasts, as contained in the Project traffic impact analysis. The Project would generate 9,857 daily trips for full buildout in 2035 (Psomas 2018). Estimated peak daily operational emissions are shown in Table 4.2-8.

**TABLE 4.2-8
PEAK DAILY OPERATIONAL EMISSIONS
FOR FULL BUILDOUT CONDITIONS**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Area sources	11	<1	<1	<1	<1	<1
Energy sources	1	6	5	<1	<1	<1
Mobile sources	8	9	94	<1	61	16
Total Operational Emissions*	20	15	99	<1	62	17
SCAQMD Significance Thresholds (Table 4)	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.						
* Some totals do not add due to rounding.						
Note: CalEEMod model data sheets are included in DEIR Appendix C						
(Table 8, <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)						

As shown in Table 4.2-8, the Project's operational emissions would be less than the SCAQMD CEQA significance thresholds for all criteria pollutants. Therefore, the Project's operational impact on regional emissions would be less than significant, and no mitigation is required.

Combined Construction and Operational Emissions during Development

During Project development, the initial phases of the Project would be occupied while construction would continue in future phases. In accordance with recent SCAQMD recommendations, a calculation of combined construction and operational emissions is provided for informational purposes. For the purposes of providing a conservative air quality analysis, mitigated emissions for the most intensive year of Phase 2 Project construction (2023) is combined with the emissions calculated for operations of Phases 1A and 1B of the Project in 2023. Additionally, mitigated emissions for the most intensive phase of construction for the Long-Range Development Phase (the highest emissions in 2028 and/or 2029) is combined with the emissions from operations of Phases 1A, 1B, and 2. These emissions are compared to the SCAQMD's operational thresholds in Table 4.2-9.

**TABLE 4.2-9
ESTIMATED ANNUAL MID-PROJECT
COMBINED EMISSIONS (LBS/DAY)**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Phase 2 Construction Emissions (2023)	2	21	26	<1	4	2
Phase 1A and 1B Operational Emissions	10	13	86	<1	30	8
Combined Operations and Construction Emissions	12	34	112	<1	34	10
Long Range Construction Emissions (Maximum from 2028/2029 emissions)	11	19	25	0	8	5
Phase 1A, 1B, and 2 Operational Emissions	12	11	70	0	33	9
Combined Operations and Construction Emissions	23	30	95	0	41	14
SCAQMD Operations Significance Thresholds (Table 4.2-4)	55	55	550	150	150	55
Exceeds Threshold	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less. Note: Totals may not add due to rounding. Sources: SCAQMD 2015 (thresholds). Emissions calculations can be found in DEIR Appendix C. (Table 9, <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)						

As shown in Table 4.2-9, combined construction and operations emissions would not exceed the operational emissions thresholds established by the SCAQMD. Therefore, this would be a less than significant impact. However, Mitigation Measures AIR-1 and AIR-2 are recommended out of an abundance of caution and a desire to reduce potential construction-related air pollutant emissions to the greatest extent feasible for area residents.

Operations Phase Localized Significance Thresholds

The SCAQMD has also developed LSTs to assess potential local impacts to nearby sensitive receptors from onsite emissions of NO₂, CO, PM10, and PM2.5 generated during the operations phase. The operations phase LST analysis was assessed at the closest receptors to the Project site, which is the persons using the existing hospital facilities.

Table 4.2-10, *Operations-Phase Localized Significance Threshold Emissions*, shows the maximum daily onsite emissions for operational activities compared with the SCAQMD LSTs with receptors within 25 meters. The Project site is approximately 28.8 acres in area. However, as per the SCAQMD's recommendation, the thresholds shown are from the lookup tables for a site that is 5.0 acres.

**TABLE 4.2-10
OPERATIONS-PHASE LOCALIZED
SIGNIFICANCE THRESHOLD EMISSIONS**

Emissions and Thresholds	Emissions (lbs/day)			
	NOx	CO	PM10	PM2.5
Area	<1	<1	<1	<1
Energy	6	5	0.4	0.4
Mobile ¹	<1	5	3.1	0.8
Total	6	10	3.5	1.3
Localized Significance Threshold	183	1,814	4	2
Exceed threshold?	No	No	No	No
lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; ¹ Onsite mobile emissions are conservatively assumed to be 5% of the total on- and off-site emissions. Note: Data is for SCAQMD Source Receptor Area 11, South San Gabriel Valley. Source: SCAQMD 2009 (thresholds); see DEIR Appendix C for CalEEMod outputs. (Table 10. <i>Air Quality and Greenhouse Gas Emissions Analysis</i> , Psomas 2018)				

As shown in Table 4.2-10, the local emissions from the Project would be less than the thresholds, and no significant impacts would result. No mitigation is required.

Summary of Impact. Regional and local construction emissions would be less than significant with the incorporation of Mitigation Measures AIR-1 and AIR-2. Long-term operational regional emissions of O₃ precursors (VOC and NO_x), CO, PM10, and PM2.5 due to mobile and consumer product sources would be less than established thresholds so impact in this regard would be less than significant and no mitigation is required.

Threshold 2.3	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)?
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As identified in Table 4.2-2, Los Angeles County is a nonattainment area for O₃, PM10, and PM2.5. The Project would generate PM10, PM2.5, NO₂, and O₃ precursors (NO_x and VOC) during short-term construction and long-term operations.

Construction Activities

Construction activities associated with the proposed Project would result in less than significant construction-related regional and localized air quality impacts with incorporation of Mitigation Measures AIR-1 and AIR-2, as quantified above in Tables 4.2-6 and 4.2-7, respectively.

SCAQMD's policy with respect to cumulative impacts associated with the above referenced pollutants and their precursors is that impacts directly less than significant would also be cumulatively less than significant (SCAQMD 2003). As discussed under Threshold 2.2, short-term construction emissions would be reduced to less than significant levels with mitigation. Therefore,

consistent with SCAQMD policy, the cumulative construction impact of criteria pollutants would be less than significant with mitigation.

Operational Activities

As shown in Tables 4.2-8 through 4.2-10, operational emissions for all analyzed pollutants would be below the SCAQMD CEQA significance thresholds. As shown in Table 4.2-10, concurrent construction and operation emissions would be less than the SCAQMD's operational thresholds. Therefore, the Project would not contribute to a cumulatively considerable increase of a pollutant for which the SoCAB is in nonattainment. Emissions of nonattainment pollutants or their precursors would not be cumulatively considerable and would be less than significant, and no mitigation would be required.

Summary of Impact. The proposed Project would result in less than significant cumulative regional and local construction emissions with the incorporation of Mitigation Measures AIR-1 and AIR-2. The Project would result in less than significant cumulative long-term regional emissions of O₃ precursors (VOC and NOX), PM₁₀, PM_{2.5}, and all nonattainment pollutants from mobile and consumer products sources, and no mitigation is required.

Threshold 2.4	Would the project expose sensitive receptors to substantial pollutant concentrations?
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A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: CO hotspots; criteria pollutants and toxic air contaminants, specifically diesel particulate matter [DPM] from onsite construction; exposure to off-site Toxic Air Contaminant (TAC) emissions; and asbestos and lead-based paint during demolition. Operational, long-term TACs may be generated by some industrial land uses, commercial land uses (e.g., gas stations and dry cleaners), and diesel trucks on freeways.

Carbon Monoxide Hotspot

The ambient air quality standard for CO is analyzed when there is a potential for severe traffic congestion at high-volume, signalized intersections. Localized areas where ambient concentrations exceed federal and/or State standards for CO are termed CO "hotspots". The Bay Area Air Quality Management District (BAAQMD) has established the number of vehicles that are likely to cause a CO hotspot within their CEQA screening criteria (BAAQMD 2017). This screening criteria states that less-than-significant impact to localized CO concentrations occurs if the following screening criteria are met:

1. Project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

In terms of the first criterion, the Project was found to be consistent with the traffic impact requirements of the City of West Covina with the exception of one intersection (Merced Avenue/Sunset Avenue). This intersection was found to result in an unavoidable significant traffic impact (Psomas 2018). However, the Project would contribute approximately 120 trips to this intersection for the AM and PM peak hour. This quantity of vehicle trips would not result in a substantial increase in CO concentrations, especially since the monitoring station data indicates that CO concentrations are substantially below the State and federal ambient air quality standards. For the second criterion, the Project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour as detailed in the Project's traffic study (Psomas 2018). For the third criterion, the Project would not increase traffic volumes to more than 24,000 vehicles per hour for any intersections including those that have constrained dispersion of air pollutants. Because the proposed Project fulfills the above mentioned BAAQMD's screening criteria, the proposed Project's vehicle trips would not result in CO concentrations of such magnitude to exceed the State and federal ambient air quality standards. Therefore, the proposed Project would not result in the creation of a CO hot spot, and the impacts would be less than significant.

Criteria Pollutants from Onsite Construction

Exposure of persons to NO_x, CO, PM₁₀, and PM_{2.5} emissions is discussed in response to Threshold 2.2 above. The Project would result in less than significant impacts with implementation of Mitigation Measures AIR-1 and AIR-2.

Toxic Air Contaminant Emissions from Onsite Construction

Construction activities would result in short-term, Project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, excavation, and grading), paving, building construction, and other miscellaneous activities. CARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments—which determine the exposure of sensitive receptors to TAC emissions—should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Project.

Relatively few pieces of off-road, heavy-duty diesel equipment would be in operation, and the total construction period would be relatively short when compared to a 30-year exposure period. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations, construction emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The impact would be less than significant, and no additional mitigation is required beyond the use of cleaner Tier III off-road equipment required under Mitigation Measure AIR-2.

Toxic Air Contaminant Emissions from Onsite Operations

The proposed Project would produce TACs from trucks and passenger vehicles accessing the site as well as the use of a proposed standby generator. Passenger vehicles associated with the Project are considered to generate levels of TACs that would substantially result in human health risk to sensitive uses proximate to the Project site. Diesel trucks related to deliveries and diesel ambulances used for transport of hospital patients do generate diesel exhaust, which is the primary source of health risk within the SoCAB. However, diesel trucks and ambulance trips

generated by the Project constitute a small proportion of vehicle trips. The locations of these vehicles (i.e., emergency room entrance) and delivery trucks (loading dock) would be at least 250 feet from the nearest offsite residential uses. This distance would allow for dispersion of diesel exhaust such that significant health risks are not anticipated. The Project would also entail the development of a standby generator in case of power outages. This generator could be powered by natural gas or diesel. To avoid exposure of diesel exhaust to offsite residences or hospital patients and staff, the use of a natural gas generator would be required for impacts to be reduced to less than significant levels as natural gas exhaust does not create a significant health risk.

Mitigation Measures

AIR-3 Prior to the start of any construction activities, proposed building plans shall demonstrate that any standby emergency generator proposed as part of that phase shall be powered by natural gas. This measure shall be implemented to the satisfaction of the City Engineer.

Summary of Impacts. With implementation of AIR-3, potential impacts from onsite TACs will be reduced to less than significant levels.

Exposure to Off-Site Toxic Air Contaminant Emissions

The CARB *Air Quality and Land Use Handbook: A Community Health Perspective* provides guidance concerning land use compatibility with TAC sources (CARB 2005). While not a law or adopted policy, the handbook offers advisory recommendations for siting sensitive receptors near uses associated with TACs (such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities) to help keep children and other sensitive populations out of harm's way.

Projects of concern for mobile sources of TACs are typically those located within 500 feet of the following types of facilities that emit significant quantities of DPM: urban roads with more than 100,000 vehicles per day; freeways or roads with a high heavy truck concentration; and/or near rail yards, ports, and/or distribution centers. The Project site is more than 500 feet from any freeway or major urban road. With respect to proximity to emissions from railroad sources, CARB recommends avoiding siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard (CARB 2005); the Project site is not located within 1,000 feet of this type of facility. CARB recommends not placing sensitive receptors within the same building as a dry cleaner and avoiding siting residences within 300 feet of a large gas station or within 500 feet of dry cleaning operations with two machines using perchloroethylene. The Project does not include residential uses, and no gas stations are located within 300 feet or dry cleaning operations within 500 feet of the proposed uses at the Project site. However, while two gas stations and one dry cleaning facility are in the vicinity of the Queen of the Valley Hospital boundary, the proposed Project components are further than the 300- and 500-foot distance recommendations. As such, no off-site sensitive uses would expose the Project uses to significant levels of TACs. Impacts would be less than significant, and no mitigation is required.

Summary of Impacts. With implementation of Mitigation Measure AQ-3, the proposed Project would have a less than significant impact related to (1) off-site CO hotspots, (2) exposure of persons to construction and operational phase criteria pollutants, (3) exposure of persons during construction or operation to toxic air contaminants.

Threshold 2.5	Would the project create objectionable odors affecting a substantial number of people?
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According to the SCAQMD's *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Project does not include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce objectionable odors. As such, the Project would have no significant impact related to objectionable odors. No mitigation is required.

4.2.6 CUMULATIVE IMPACTS

Air quality is generally a regional issue, determined by geography and meteorology. The geographic context for air quality impacts is the SoCAB. The USEPA and CARB use the SoCAB as the basis for attainment designations. As discussed in Threshold 2.2, SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. Therefore, if a project has a direct significant impact, it would also have a cumulative significant impact. Threshold 2.2 includes an analysis of the Project's impact on regional nonattainment pollutants and concludes that the long-term impact to regional O₃, NO₂, PM₁₀, and PM_{2.5} concentrations would be less than significant with implementation of the recommended mitigation (i.e., AIR-1 through AIR-3). In addition, Table 4.2-11 demonstrates that the proposed Project is consistent with the General Plan policies and actions related to air quality. Therefore, Project-related cumulative impacts to regional O₃, NO₂, PM₁₀, and PM_{2.5} concentrations would be less than significant, and no additional mitigation is required.

As outlined in the discussion of Threshold 2.3, long-term CO emissions would not exceed the SCAQMD CEQA significance threshold, and the concern for CO is local and not regional. Therefore, the cumulative regional CO impact would be less than significant. With respect to local concentrations of CO, the hotspot analysis of Threshold 2.4 is also a cumulative analysis because it considers traffic from existing and all future sources as well as traffic from the Project. The impact would be less than significant.

The Project's contribution to both regional and local TAC concentrations would be less than significant with the recommended mitigation (AIR-3), so there would be no cumulative impacts in this regard.

**TABLE 4.2-11
GENERAL PLAN CONSISTENCY**

General Plan Policies and Actions	Consistency Analysis
Our Natural Community (sub-section Air)	
Policy 1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.	Consistent. The hospital and expansion Project will allow for continued access for employees and visitors via cars, bicycles, and walking as needed. The Hospital does not have its own vehicle fleet and is served mainly by public and private ambulances and private vehicles, so Action 1.1 does not apply to this Project.
Action 1.1 Continue to channel Federal, State and Local transportation funds to programs, and infrastructure improvements that reduce air pollution through the promotion of walking, biking, ride-sharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.	
Policy 1.3 Minimize the adverse impacts of growth and development on air quality and climate.	Consistent. The air quality analysis indicates the hospital expansion will have less than significant impacts related to local and regional air quality with implementation of the recommended mitigation measures. Note that Section 4.6 specifically addresses greenhouse gas (GHG) emissions.
Action 1.3 Prepare and adopt a plan to reduce greenhouse gases as part of the Environmental Impact Report (to be concurrently approved with the West Covina General Plan) to achieve compliance with State mandates, and consistency with the Regional Transportation Plan/Sustainable Community Strategy to facilitate development by streamlining the approval process, and to improve air quality.	

4.2.7 IMPACTS OF MITIGATION MEASURES

Implementation of Mitigation Measures AIR-1 through AIR-3 may temporarily affect the timing of construction but would not in and of themselves create any significant environmental impacts.

4.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

- Impact 2.1** The Project would not conflict with the applicable air quality management plan.
- Impact 2.2** Construction regional and local criteria pollutant emissions would be less than significant with incorporation of Mitigation Measures AIR-1 and AIR-2. Long-term operational criteria pollutant regional emissions would also be less than significant.
- Impact 2.3** The proposed Project would result in less than significant cumulative regional and local construction and operational emissions of O₃ precursors (VOC and NOX), PM₁₀, and PM_{2.5}, and all non-attainment pollutants.
- Impact 2.4** Potential exposure of persons to substantial amounts of pollutants (CO hotspot and criteria pollutants,) would be less than significant with implementation of Mitigation Measure AIR-3.
- Impact 2.5** The Project would have less than significant impacts related to odors.

4.2.9 REFERENCES

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4.3 BIOLOGICAL RESOURCES

This section describes the existing biological resources condition of the Project site and surrounding area and evaluates potential impacts of the proposed Queen of the Valley Hospital (QVH or Hospital) expansion on those resources.

No comments were received during the NOP period or during the scoping meeting that addressed biological resources.

4.3.1 RELEVANT POLICIES AND REGULATIONS

Federal

Federal Endangered Species Act

The Federal Endangered Species Act of 1973 (FESA) protects plants and animals that the government has listed as “endangered” or “threatened.” A federally listed species is protected from unauthorized “take,” which is defined in the FESA as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct.” 16 U.S.C Sections 1532(19) and 1538(a). In this definition, “harm” includes “any act which actually kills or injures fish or wildlife and emphasizes that such acts may include significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife.” 50 C.F.R. Section 17.3. Unless performed for scientific or conservation purposes with the permission of the U.S. Fish and Wildlife Service (USFWS), “take” of listed species is only permissible if the USFWS issues an Incidental Take Permit (ITP), which requires USFWS to conclude that “the impacts of such taking” have been “minimize[d] and mitigate[d]... [to] the maximum extent practicable,” “the taking will not appreciably reduce the likelihood of the survival and recovery of the species in the wild,” and the applicant has made adequate assurances for a Habitat Conservation Plan (HCP). 16 U.S.C. Section 1539(a); 50 CFR Sections 17.21(a), (c) and 17.31(a). All federal agencies, including the USFWS in issuing an ITP, must ensure that their activities are “not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species.” 16 U.S.C. Section 1536(a). Enforcement of FESA is administered by the USFWS.

FESA also provides for designation of Critical Habitat: specific areas within the geographical range occupied by a species where physical or biological features “essential to the conservation of the species” are found and “which may require special management considerations or protection.” 16 U.S.C. Section 1538(5)(A). Critical Habitat may also include areas outside the current geographical area occupied by the species that are nonetheless “essential for the conservation of the species.” *Id.*

Whenever federal agencies authorize, fund, or carry out actions that may adversely modify or destroy Critical Habitat, they must consult with USFWS under Section 7 of the FESA. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing uses federal funds, or requires federal authorization or permits.

If USFWS determines that Critical Habitat will be adversely modified or destroyed from a proposed action, the USFWS will develop reasonable and prudent alternatives in cooperation with the federal institution to ensure the purpose of the proposed action can be achieved without loss of Critical Habitat. If the action is not likely to adversely modify or destroy Critical Habitat, USFWS will include a statement in its biological opinion concerning any incidental take that may be

authorized and specify terms and conditions to ensure the agency is in compliance with the opinion.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits actions, unless permitted, “to pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of the Convention for the protection of migratory birds or any part, nest, or egg of any such bird.” (16 U.S.C. Section 703).

The MBTA covers the taking of any nests or eggs of migratory birds, except as allowed by permit pursuant to 50 Code of Federal Regulations (CFR), Part 21. Disturbances causing nest abandonment and/or loss of reproductive effort (i.e., killing or abandonment of eggs or young) may also be considered “take.” This regulation seeks to protect migratory birds and active nests.

In 1972, the MBTA was amended to include protection for migratory birds of prey (e.g., raptors). Six families of raptors occurring in North America were included in the amendment: Accipitridae (kites, hawks, and eagles); Cathartidae (New World vultures); Falconidae (falcons and caracaras); Pandionidae (ospreys); Strigidae (typical owls); and Tytonidae (barn owls). The provisions of the 1972 amendment to the MBTA protects all species and subspecies of the families listed above. The MBTA protects over 800 species including geese, ducks, shorebirds, raptors, songbirds and many relatively common species. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 CFR 10.13), as updated by the 1983 American Ornithologists’ Union (AOU) Checklist and published supplements by the USFWS.

Section 404 of the Clean Water Act

Since 1972, the Corps and U.S. Environmental Protection Agency (EPA) have jointly regulated the filling of “waters of the U.S.,” including wetlands, pursuant to Section 404 of the Clean Water Act (CWA). The Corps has regulatory authority over the discharge of dredged or fill material into the waters of the United States under Section 404 of the CWA. The Corps and EPA define “fill material” to include any “material placed in waters of the United States where the material has the effect of: (i) replacing any portion of a water of the United States with dry land; or (ii) changing the bottom elevation of any portion of the waters of the United States.” Examples include, but are not limited to, sand, rock, clay, construction debris, wood chips, and “materials used to create any structure or infrastructure in the waters of the United States.” In order to further define the scope of waters protected under the CWA, the Corps and EPA published the Clean Water Rule on June 29, 2015.

As discussed below, there are no waters of the United States or wetlands on the Project site.

Section 401 of the Clean Water Act

Applicants for a federal license or permit for activities which may discharge to waters of the US must seek Water Quality Certification from the state or Indian tribe with jurisdiction.¹ This certification provides for the protection of the physical, chemical, and biological integrity of waters,

¹ Title 33, United States Code, Section 1341; Clean Water Act Section.

addresses impacts to water quality that may result from issuance of federal permits, and helps insure that federal actions will not violate water quality standards of the State or Indian tribe. In California, there are nine RWQCBs that issue or deny Certification for discharges to waters of the United States and waters of the State, including wetlands, within their geographical jurisdiction. Water Quality Certification must be based on a finding that the proposed discharge will comply with water quality standards, which are defined as numeric and narrative objectives in each RWQCB's Basin Plan. Where applicable, the State Water Resources Control Board has this responsibility for projects affecting waters within the jurisdiction of multiple RWQCBs. The RWQCB's jurisdiction extends to all waters of the state and to all waters of the US, including wetlands.

Section 401 of the Clean Water Act requires that "any applicant for a federal permit for activities that involve a discharge to waters of the State, shall provide the federal permitting agency a certification from the State in which the discharge is proposed that states that the discharge will comply with the applicable provisions under the federal Clean Water Act." Therefore, before the Corps will issue a Section 404 permit, applicants must apply for and receive a Section 401 water quality certification from the RWQCB. There are no waters of the United States or wetlands on the Project site; therefore, a Section 401 water quality certification is not required.

State

California Endangered Species Act

In addition to federal laws, the state of California implements the California Endangered Species Act (CESA) which is enforced by California Department of Fish and Wildlife (CDFW). The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar. State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in "take" of individuals (defined in CESA as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") are regulated by CDFW. Habitat degradation or modification is not included in the definition of "take" under CESA. Nonetheless, CDFW has interpreted "take" to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species. The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State-threatened and endangered species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label species of concern, as an informal term that refers to species which might be in need of concentrated conservation actions. As the Species of Concern designated by USFWS do not receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

If a species is also federally listed, CDFW can issue a consistency finding in accordance with Section 2080.1 of the Fish & Game Code if the USFWS has issued an incidental take authorization which also satisfies CESA's requirements.

California Environmental Quality Act

Section 15380 of the California Environmental Quality Act (CEQA) Guidelines independently defines “endangered” and “rare” species separately from the definitions of the CESA. Under CEQA, “endangered” species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while “rare” species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

California Fish and Game Code

The CDFW administers the *California Fish and Game Code*. There are particular sections of the Code that are applicable to natural resource management.

Birds of Prey and Migratory Birds

Section 3503 of the *California Fish and Game Code* makes it unlawful to destroy any birds' nest or any birds' eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code. Section 3503.5 of the *California Fish and Game Code* specifically protects birds of prey. A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site.

Section 3513 of the *California Fish and Game Code* duplicates the federal protection of migratory birds.

A consultation with CDFW would be required prior to the removal of any bird of prey nest that may occur on a project site.

Section 3511 of the *California Fish and Game Code* lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Examples of species that are State fully protected include golden eagle (*Aquila chrysaetos*), and white-tailed kite (*Elanus leucurus*). There are no fully protected birds expected to occur at the Project site.

Section 4700 of the *California Fish and Game Code* lists fully protected mammals, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. There are no fully protected mammals expected to occur in the Project site.

Sections 1900–1913 of the *California Fish and Game Code* were developed to preserve, protect, and enhance Rare and Endangered plants in the state of California. The act requires all state agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed. As discussed below, the Project site does not provide suitable habitat that would support rare or endangered plant species.

California Fish and Game Code Sections 1600 et seq. establish a fee-based process to ensure that projects conducted in and around lakes, rivers, or streams do not adversely impact fish and

wildlife resources, or, when adverse impacts cannot be avoided, ensures that adequate mitigation and/or compensation is provided.

California Fish and Game Code Section 1602 applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State. CDFW's regulatory authority extends to include riparian habitat (including wetlands) supported by a river, stream, or lake regardless of the presence or absence of hydric soils and saturated soil conditions. As discussed below, there are no areas under the jurisdiction of CDFW based on *California Fish and Game Code* Section 1602 on the Project site.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act charges the State Water Resources Control Board (SWRCB) and the nine RWQCBs statewide with protecting water quality throughout California. Typically, the SWRCB and RWQCB act in concert with the Corps under Section 401 of the CWA in relation to permitting fill of federally jurisdictional waters. As discussed above, the Supreme Court recently acted to limit the regulatory jurisdiction of the Corps under Section 404 of the CWA (USSC 2001). The action did not limit the state's regulatory jurisdiction over Waters of the state (Guzy and Anderson 2001). Waters of the state are defined in Section 13050(e) of the Porter-Cologne Water Quality Control Act as "...any surface or groundwater, including saline waters, within the boundaries of the state." As previously indicated, there are no wetlands on the Project site.

The Project site is located within San Gabriel River Watershed of RWQCB Region 4, Los Angeles. The SWRCB and the RWQCB have adopted a Water Quality Control Plan for this region (the Basin Plan). The Basin Plan establishes water quality standards for surface and groundwater resources and includes beneficial uses and levels of water quality that must be met and maintained to protect these uses. The Basin Plan is further discussed in Section 4.8, *Hydrology and Water Quality*, of this Program EIR.

City of West Covina

West Covina General Plan

The "Our Natural Community" Section of the City's General Plan (PlanWC) contains several "Access to Nature" policies and actions encouraging conservation of parkland and open space and reducing potential lighting impacts on residential areas, while the "Street Trees" Section has a policy addressing the replacement of any street trees that are lost during construction (City of West Covina 2016a). The consistency of the proposed Project with these various PlanWC policies and actions will be evaluated later in this section.

Municipal Code

Section 24.16 of the Municipal Code outlines the City's review process for the removal of street or parkway trees (i.e., "Trees in Public Places") but does not address native or heritage trees (City of West Covina 2018).

4.3.2 METHODS

A literature review and records search were conducted by Psomas to determine which sensitive biological resources have the potential to occur on or within the general vicinity of the Project site. Due to the fully improved nature of the property, a full habitat assessment or field survey was not

conducted; however, a brief walkover was conducted on November 15, 2018, which identified a number of landscaped areas with trees and shrubs onsite. A detailed survey of onsite trees was not conducted and is not required for compliance with Section 26, Article VI, Division 9 entitled “Tree Protection Standards” in the City’s Zoning Code. According to applicable resource agencies, sensitive biological resources are defined as:

- Listed plant and wildlife species are those that are found within California or off the coast of the State that have been classified as Endangered or Threatened by the U.S. Secretary of the Interior or the U.S. Secretary of Commerce (federal list) or by the California Fish & Wildlife (state list). The federal agencies responsible for listing are the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS).
- Plant and animal taxa listed on CDFW’s California Natural Diversity Database (CNDDDB), regardless of their legal or protection status (database search dated November 21, 2018). These species are not always federally or state listed.
- Sensitive species also refer to birds protected under the Migratory Bird Treaty Act and Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the Fish and Game Code).

Previously recorded occurrences of sensitive plant and wildlife species and their proximity to the Project site were determined through a query of the following: CDFW’s CNDDDB Rarefind 5 software; the California Native Plant Society (CNPS) *Electronic Inventory of Rare and Endangered Vascular Plants of California*; the Calflora Database; the compendia of special-status species published by the CDFW; and USFWS Critical Habitat designations for Threatened and Endangered Species.

4.3.3 EXISTING SETTING

This section describes the existing biological resources of the Project site and surrounding area. The general environs of the City of West Covina (i.e., the San Gabriel Valley) once comprised sprawling native grasslands that connected to the San Gabriel Mountains to the north and the Puente Hills to the east. While the local mountains still support extensive native vegetation and habitat for native animals, the City itself and surrounding communities are largely urbanized with only isolated areas that support remnant native vegetation. The Hospital site and the former Sunset Park property are currently fully developed and contain no native vegetation or habitat (General Plan EIR Figure 4.3-1, Vegetation Communities). The only source of water in the area, other than landscaping irrigation, is the fully improved Walnut Creek (flood control) Channel just north of the Project site. The Hospital property and former City park site do contain dozens of large trees and landscaped areas, mainly turf. However, onsite vegetation is either introduced or weedy species that provide minimal habitat for native animals except for songbirds and small mammals tolerant of human activity (e.g., ground squirrels). It is possible onsite trees and large shrubs may provide some nesting or roosting opportunities for migratory birds or raptors. In its present condition the Hospital site provides minimal support for sensitive or important biological resources within the City (General Plan EIR Figure 4.3-2, Special Status Species).

4.3.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on biological resources if it will:

- Have a substantial adverse effect, either directly or through habitat modification, 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.

- 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.
- 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.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- 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?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

4.3.5 ENVIRONMENTAL IMPACTS

Threshold 3.1	Would the project have a substantial adverse effect, either directly or through habitat modification, 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?
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As indicated above, while the City and surrounding communities are largely urbanized with only isolated areas that support remnant native vegetation, according to information obtained from a variety of resource agency websites and databases², the surrounding region³ contains a total of 44 listed or sensitive resources, including 14 sensitive plant species, 27 listed or sensitive wildlife species, and 3 sensitive natural communities. Some notable wildlife sub-group include four species of raptors (e.g., Swainson's hawk, Cooper's hawk), eight species of birds, three species of small mammals, one fish (arroyo chub), four species of reptiles, six bat species, and one insect species. Three sensitive communities (e.g., California walnut woodland) are found in the more northern portion of the region, which includes the San Gabriel Mountain foothills but are not present in the vicinity of the Project site. A complete list of these resources and their current listing or sensitive status is provided in Appendix D.

Although the surrounding region does contain a number of sensitive biological resources, the Project site itself is entirely developed with improved uses and surfaces so there is no native vegetation or habitat; therefore, little or no potential for sensitive plant or wildlife species to be present on the Project site. For similar reasons, surrounding properties also do not support native plant communities or sensitive habitat although the Walnut Creek Channel is immediately adjacent to the north of the Project site. This channel is fully improved for flood control purposes and does not contain significant vegetation or habitat resources. The Project site does contain a number of trees and large shrubs in landscaped areas that may provide nesting or roosting

² See Section 4.3.2, Methods, for a listing of the applicable databases

³ Comprises three USGS 7.5-minute quadrangles; Baldwin Park, El Monte, and San Dimas.

opportunities for various birds. However, the entire site is covered with impervious surfaces (asphalt, concrete, gravel) or improved landscaping, and the site has been extensively disturbed and subject to high levels of ongoing human activity. The planned phasing of construction activities would also not affect these impacts as the site as a whole contains little or no biological resources other than trees and large shrubs. Based on available information and existing site conditions, it is unlikely that listed/sensitive bird species, including burrowing owl, are present or would be present in the future on the Project site.

Summary of Impact. No impacts on federal or state Candidate, Sensitive, or Special Status species would result with implementation of the proposed Project, and no mitigation is required. Also refer to discussion under Threshold 3.4 regarding migratory birds and raptors.

Threshold 3.2	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?
Threshold 3.3	Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project site is fully developed with various buildings, parking areas, equipment areas, walkways, and landscaped areas. There is no native vegetation or any sensitive natural communities onsite. Additionally, there are no water bodies, drainages, or wetlands as defined by state and federal resource agencies. The Walnut Creek (flood control) Channel is immediately adjacent to the north of the Project site; however, it contains no resources under the jurisdiction of state or federal resource agencies, and the proposed Project would not have any direct impacts on this drainage channel. The planned phasing of construction activities would also not affect these impacts as the site as a whole contains little or no biological resources other than landscaping trees and large shrubs.

Summary of Impact. The Project would have no impacts on riparian habitat or other sensitive natural community, or any federally protected wetlands, and no mitigation is required.

Threshold 3.4	Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
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Wildlife Movement

The site does contain trees and large shrubs that may support avian species, but the Project site is fully developed with an operating hospital, and the level of human activity and disturbance is very high. This property is not within any regionally or locally recognized wildlife movement corridors (SCW 2008). According to PlanWC and the General Plan EIR, this portion of the City of West Covina, including the Project site, does not contain known native wildlife nursery sites. The Walnut Creek (flood control) Channel is immediately adjacent to the site to the north. At this location the channel is a 50-foot wide rectangular concrete-lined channel and does not contain native vegetation that would support regular wildlife movement within or along the channel. The channel contains flowing water at various times of the year and has 15-foot wide maintenance

roads on both sides of the channel with landscaping separating it from developed uses on both sides of the channel. Therefore, it is likely that area wildlife may occasionally move along the channel and/or maintenance roads. The channel corridor also does not appear to support any important nursery sites due to the level of disturbance and physical limitations of the channel (i.e., vertical concrete sides and concrete bottom).

The RWQCB – Los Angeles Region is responsible for preserving and enhancing water quality and protecting the beneficial uses⁴ of water bodies in the Los Angeles Basin, including the San Gabriel River⁵ watershed (i.e., Reach 1 of the river is 2 miles downstream of the Project site). To this end, the RWQCB: (1) designates beneficial uses for surface and subsurface waters (groundwater); (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's antidegradation policy; (3) describes the implementation needed to achieve water quality objectives and protect the beneficial uses of all waters in the region; (4) describes the comprehensive monitoring and assessment program used to evaluate the effectiveness of the measures; and (5) provides an overview of water resource management studies and projects that are in progress in the region.

According to the Basin Plan, the potential or intermittent beneficial uses of the adjacent Walnut Creek Wash (Hydro Unit 405.41) include the following:

- Municipal and Domestic Supply (MUN);
- Groundwater Recharge (GWR);
- Water Contact Recreation (REC1) although access is prohibited by the Los Angeles County Flood Control District;
- Non-Water Contact Recreation (REC2);
- Warm Freshwater Habitat (WARM) but only in the foothills and near the confluence with the San Gabriel River;
- Wildlife Habitat (WILD) also only in the foothills and near the confluence with the San Gabriel River; and
- Wetland Habitat (WET) also only in the foothills and near the confluence of the San Gabriel River.

Although portions of the wash support these beneficial uses, the portion of the channel adjacent to the Project site is lined with concrete with vertical sides and thus would provide little or no actual support for any biological resources. The proposed Project would not encroach into or impact the flood control corridor (i.e., channel and adjacent maintenance roads); therefore, Project development would not have any direct and only incremental impacts on whatever limited wildlife movement occurs along the channel. In addition, the planned phasing of construction activities would not affect the channel, and the site as a whole contains little or no biological resources other than landscaping trees and large shrubs.

For these reasons, the proposed expansion of the existing hospital would not have a significant impact on regional wildlife movement through this portion of the San Gabriel Valley or within the south coast region as a whole. Implementation of the proposed Project would also have a less

⁴ Beneficial uses refers to the various ways that water can be used for the benefit of people and wildlife (i.e., drinking, swimming, agricultural water supply, and support of aquatic habitats).

⁵ A Clean Water Act Section 303(d)impaired water body and the Walnut Creek Wash contributes toxicity to Reach 1 of the river.

than significant impact on the movement of wildlife species through this portion of Los Angeles County.

Migratory Birds and Nesting Raptors

Trees and large shrubs on the Project site and in the surrounding area may contain or have the potential to provide suitable nesting opportunities for avian species. In addition, the many trees in the area have a potential to provide suitable nesting opportunities for a variety of raptor species. It should be noted that, under the QVHSP, hundreds of new trees will be planted on the Hospital property during construction of the various Project-related improvements, and these trees will eventually provide additional nesting and roosting opportunities for migratory birds and raptors as they mature.

Nesting birds are protected pursuant to the MBTA, Bald/Golden Eagle Protection Act, and Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the *California Fish and Game Code* prohibit the take, possession, or destruction of birds, their nests or eggs). Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 CFR 10.13, as amended). If avian nesting behaviors are disrupted (e.g., nest abandonment and/or loss of reproductive effort), it is considered “take” under the MBTA and the *California Fish and Game Code*. Similarly, the loss of an active nest of any raptor species, including common raptor species, would be considered a violation of Sections 3503, 3503.5, and 3511, 3513 of the *California Fish and Game Code*.

The literature search indicated eight species of birds and four species of raptors, including Cooper’s hawk and Swainson’s hawk, may be present in the general Project region. Pre-construction clearance surveys for nesting bird and raptor surveys should be required to be conducted prior to any vegetation removal, tree removal, or ground disturbing activities that may disrupt the birds during the avian and raptor nesting seasons. The nesting season generally extends from February 1 through August 31 but can vary slightly from year to year based upon seasonal weather conditions. Some raptor species can nest as early as December. Therefore, it is recommended that the nesting bird clearance window be expanded from December 1 through August 31.

The pre-construction clearance survey for nesting avian species and raptors should be conducted within three days prior to any ground disturbing activities to ensure that no nesting birds would be disturbed during construction. As long as development does not cause direct take of a bird or egg(s) or disrupt nesting behaviors, immediate protections would not be required. If an active nest(s) is discovered during the pre-construction clearance survey, construction activities might have to be rerouted; a no-work buffer area may have to be established around the nest; or work might be delayed until the nest is inactive (young have fledged or the nest has failed). A biological monitor would need to be present to delineate the boundaries of the buffer area if an active nest is observed and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. The planned phasing of construction activities would also not affect these impacts as the site as a whole contains little or no biological resources other than landscaping trees and large shrubs.

Burrowing owl is considered to be absent from the site and it is not likely to be present in the future due to the lack of available uncovered land; the extensive level of disturbance; and high level of human activity on the site.

This analysis indicates that potential Project-related construction impacts to migratory birds and nesting raptors may be significant and require mitigation.

Mitigation Measures

The following measures are recommended to reduce potential impacts related to nesting birds and raptors to less than significant levels:

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

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

If the biologist finds an active nest on the Project site and determines that the nest may be impacted, the Biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the biologist in consultation with California Department of Fish and Wildlife (CDFW), and shall be based on the nesting species, its sensitivity to disturbance, and expected types of disturbance. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The Biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent monitoring shall be provided to the Property Owner, CDFW and the City. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds. Construction within the designated buffer area shall not proceed until written authorization is received by the applicant from CDFW.

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

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

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

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

Summary of Impact. Compliance with the MBTA and Sections 3503, 3503.5, 3511 and 3513 of the *California Fish and Game Code*, as outlined in Mitigation Measures BIO-1 and BIO-2, would ensure that potential impacts to nesting birds and raptors are less than significant. Additionally, the planting of hundreds of new trees under the Specific Plan would help continue to provide nesting opportunities for avian species and raptors.

Threshold 3.5	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?
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The proposed Project site is in a highly urbanized region and not within any established Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved type of habitat conservation plan. In addition, there are no HCP or NCCP areas within two miles of the Project site. Therefore, the proposed Project would not have any significant impacts in this regard, and no mitigation is required.

Threshold 3.6	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
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The “Our Natural Community” Section of PlanWC contains several “Access to Nature” policies and actions encouraging conservation of parkland and open space and reducing potential lighting impacts on residential areas (Policy 1.4 and Action 1.4). In addition, the “Street Trees” Section of

PlanWC has a policy and action that address the replacement of any street trees that are lost during construction (Policy 1.11 and Action 1.11b) (City of West Covina 2016a). In addition, new development must be consistent with the “Tree Protection Standards” of the City’s Zoning Code (MC Chapter 26, Article VI, Division 9). The conversion of Sunset Fields to hospital-related uses is not in itself consistent with General Plan Policy 1.11 or Action 1.11b. However, a City-wide ballot measure approved by the electorate determined that the proposed park conversion action was consistent with the goals and policies of the General Plan as the funding from the sale of the land to the hospital would be placed in an account specifically for the purpose of acquiring new parkland. In addition, any street tree replacement, protection, and maintenance associated with implementation of the proposed Project shall be conducted in accordance with PlanWC and specific requirements set forth in Chapter 24.16 and Chapter 26 of the City’s Municipal Code. Any onsite trees that must be removed as part of construction would be replaced in accordance with the Specific Plan, Section 4.4, *Design Guidelines, Landscaping*.

Future onsite improvements under the Specific Plan would include appropriate tree replacement if necessary to comply with the City’s requirements. Therefore, no impact would occur regarding local policies related to biological resources, and no mitigation is required.

Summary of Impact. If necessary, removal/replanting of street trees for the Project would be conducted in compliance with PlanWC and Municipal Code. Removal and replanting of onsite trees for Project construction would comply with the landscaping requirements of the Specific Plan. Therefore, no impacts would occur related to conflicts with local policies or ordinances.

4.3.6 CUMULATIVE IMPACTS

The City of West Covina, including the Project site, is predominantly developed and surrounded by urban development. The Project site does not contain sensitive biological resources and, based on information provided in the City’s General Plan EIR, potential cumulative projects in other developed areas of the City would not impact areas that contain significant biological resources (West Covina 2016b). Additionally, any removal of vegetation or trees as part of the proposed Project and any future development in this portion of the City would be required to comply with existing regulations for the protection of biological resources (e.g., the MBTA, and the City’s “Trees in Public Places” Ordinance, and the landscaping provisions of the Specific Plan). Therefore, the Project would not make a significant contribution to any cumulatively considerable impacts related to biological resources.

4.3.7 IMPACTS OF MITIGATION MEASURES

Implementation of Mitigation Measures BIO-1 and BIO-2 (i.e., pre-construction nesting bird and raptor surveys) would not result in any direct or indirect impacts that could have a significant effect on the environment.

4.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures BIO-1 and BIO-2, all potential Project-related impacts to biological resources would be reduced to less than significant levels.

4.3.9 REFERENCES

- California Department of Fish and Wildlife (CDFW). 2018. *California Natural Diversity Data Base (CNDDB)* website search. November 21, 2018 (EIR Appendix D).
- Environmental Laboratory. 1987. *Corps of Engineers Wetland Delineation Manual*. Technical Report Y-87-1. Vicksburg, MS: U.S. Army Engineer Waterways Experiment Station.
- Regional Water Quality Control Board – Los Angeles Region (RWQCB – LAR). 2000. *State of the Watershed – Report on Surface Water Quality, The San Gabriel River Watershed*. June 2000.
- South Coast Wildlands (SCW). 2008. *South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion*. Fair Oaks, CA: SCW. <http://www.scwildlands.org/reports/scmlregionalreport.pdf>.
- West Covina, City of (City). 2018 (January 1, 2018). *Municipal Code, Chapter 24, Vegetation, Section 24.16, Trees in Public Places*. City of West Covina, CA.
- . (City) 2016a. *West Covina General Plan (PlanWC)*. City of West Covina, December 2016.
- . 2016b (December). *West Covina 2016 General Plan Update Draft Program Environmental Impact Report*. West Covina, CA.

4.4 CULTURAL AND SCIENTIFIC RESOURCES

An assessment of archaeological and paleontological resources related to the Project site and surrounding area was prepared by Psomas and is included in Appendix E of this Program EIR. This section evaluates the proposed Queen of the Valley Hospital (QVH or Hospital) expansion project's potential to have adverse effects on these resources.

No comments were received during the NOP period or at the scoping meeting regarding cultural resources.

4.4.1 RELEVANT POLICIES AND REGULATIONS

State

California Environmental Quality Act and California Register of Historical Resources

The California Environmental Quality Act (CEQA) requires a lead agency to determine whether a project would have a significant effect on one or more historical resources. According to Section 15064.5(a) of the State CEQA Guidelines, a “historical resource” is defined as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC Section 21084.1); a resource included in a local register of historical resources (14 *California Code of Regulations* [CCR], Section 15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR Section 15064.5[a][3]).

Section 5024.1 of the PRC, Section 15064.5 of the State CEQA Guidelines, and Sections 21083.2 and 21084.1 of the CEQA Statutes were used as the basic guidelines for this cultural resource analysis. Section 5024.1 of the PRC requires the evaluation of historical resources to determine their eligibility for listing in the CRHR. The purposes of the CRHR are to maintain listings of the State's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP) (per the criteria listed at 36 CFR Section 60.4) are stated below.

The quality of significance in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California is present in any object, building, structure, site, area, place, record, or manuscript that possesses integrity of location, design, setting, materials, workmanship, feeling and association and that:

- (a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or
- (b) Is associated with the lives of persons important in our past; or
- (c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (d) Has yielded, or may be likely to yield, information important in prehistory or history.

According to Section 15064.5(a)(3)(A–D) of the State CEQA Guidelines, a resource is considered historically significant if it meets the criteria for listing in the NRHP (per the criteria listed at 36 CFR 60.4). Impacts that affect those characteristics of the resource that qualify it for the NRHP or that would adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to cultural resources from a project are thus considered significant if the project: (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource that contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

The purpose of a cultural resources investigation is to evaluate whether any artifacts remain exposed on the surface of the project area or whether any cultural resources can reasonably be expected to exist in the subsurface. If resources are discovered, management recommendations would be required for evaluation of the resources for CRHR eligibility.

Broad mitigation guidelines for treating historical resources are codified in Section 15126.4(b) of the CEQA Guidelines. To the extent feasible, public agencies should seek to avoid significant effects to historical resources, with preservation in place being the preferred alternative. If not feasible, a data recovery plan shall be prepared to guide subsequent excavation. Mitigation for historical resources such as buildings, bridges, and other structures that are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Weeks and Grimmer 1995) will generally be considered mitigated below a level of significance.

Paleontological Resources

Fossils are considered scientifically significant if they meet any one or more of the following criteria:

- **Taxonomy:** rare or undocumented fossils (or fossil assemblages), those containing species new to the scientific community, or species that are rare or undocumented for that specific area or geologic formation
- **Evolution:** fossils that provide insight to evolutionary relationships and trends of living and extinct organisms
- **Biostratigraphy:** fossils that provide information on a narrow geologic time frame, extinction events, or those that correlate geologic formations throughout geographic regions. This includes index fossils (abundant, widespread, short-lived, easily identifiable fossils) for a given time period.
- **Paleoecology:** fossils that provide information on the interactions between organisms in a community and the ecosystem and how these interactions change through geological time
- **Taphonomy:** fossils that are extremely well preserved, including preservation of soft tissues that are not commonly fossilized, or organisms that are rarely fossilized and are of particular significance
- **Endangered:** rare and/or geographically localized fossils that are at risk of vandalism, exploitation, or destruction

Due to the unpredictable nature of the fossil record in given depositional environments, the significance of a specific fossil type is variable. Vertebrate fossils, especially those with stratigraphic or ecological context, are considered scientifically significant. Invertebrate and plant

fossils may be considered significant, dependent on the stratigraphic, ecological, temporal, or evolutionary indicators they provide.

Sensitivity of paleontological resources is highly correlated with the geology in which they are found. The Society of Vertebrate Paleontology (“SVP”) has categorized the paleontological potential of rock types or formations as having either high, low, undetermined, or no potential. A formation can be a single rock type, or it can contain a suite of closely related rock types that are commonly found in a specific depositional environment. A field survey, along with a geologic literature review, is necessary to determine the paleontological sensitivity of a given area which is classified as follows:

- **High:** rock units with high potential for fossil occurrences are those where fossils have previously been recovered and are likely to contain additional fossil resources. These include most sedimentary units that are middle Holocene or older, along with some volcanoclastic units and low-grade metamorphic rocks. Sedimentary rock units that have higher potential for paleontological sensitivity are fine-grained sandstones, silt, clay, mudstone, and limestone. Rock units with large clasts may have lower potential due to the likelihood of destruction of remains before fossilization occurs.
- **Low:** rock units with low potential for fossil occurrences are those that have not produced fossil remains and have a low likelihood for fossil recovery in the future.
- **Undetermined:** rock units with undetermined potential for fossil occurrences are those that have little to no exposure or have not been adequately studied. A field survey is required to determine mitigation measures for these rock units.
- **No:** rock units with no potential for fossil occurrences include igneous and high-grade metamorphic rocks. These rock units do not require mitigation with respect to paleontological resources.

California Health and Safety Code (Sections 7050.5, 7051, and 7054)

These sections of the *California Health and Safety Code* collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the *California Public Resources Code*). These sections also address the disposition of Native American (NA) burials in archaeological sites and protect such remains from disturbance, vandalism, or inadvertent destruction. Procedures to be implemented are established for (1) the discovery of NA skeletal remains during construction of a project; (2) the treatment of the remains prior to, during, and after evaluation; and (3) reburial.

Section 7050.5 of the *California Health and Safety Code* specifically provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

California Public Resources Code (Section 5097.98)

Section 5097.98 of the *California Public Resources Code* states that, if remains are determined by the Coroner to be of NA origin, the Coroner must notify the NA Heritage Commission (NAHC) within 24 hours. When the NAHC receives notification of a discovery of NA human remains from a County Coroner, it shall immediately notify those persons it believes to be most likely descended from the deceased NA. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the NA human remains

and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. This regulation also requires that, upon the discovery of NA remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the NA human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations and all reasonable options regarding the descendants' preferences for treatment. This section of the *California Public Resources Code* has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

City of West Covina

The City's General Plan (PlanWC), "Our Creative Community" Section, Sub-Section D, Celebrate and Promote West Covina's Cultural Assets, contains the following policy and action:

Policy 7.7 Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and Assembly Bill 52 and Senate Bill 18 for consultation with Native American tribes for development projects carried out within the City.

Action 7.7 Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

The City's Municipal Code does not contain any specific sections or codes relative to cultural, archaeological, or paleontological resources.

4.4.2 METHODS

An online paleontological records search and literature review were conducted to determine if any fossil localities have been recorded in Project area or in the general vicinity. Sources for the records search included the PaleoBiology Database from 2018 and the University of California Museum of Paleontology NEOMAP Database also from 2018. For archaeological data, Psomas used the results of the City's General Plan EIR to identify the most important public, non-restricted resources, to assess the Project's impacts to cultural resources. For archaeological and historical resources, a database search of public non-restricted data concerning NRHP resources was conducted on October 30, 2018 (NPS 2018). This study omits confidential information on resources such as specific locations of prehistoric archaeological sites, tribal cultural resources, or historic archaeological sites. In addition, the California Historical Resources Inventory System (CHRIS) records were searched in December of 2018. The public non-restricted results of the various database searches are presented in Appendix E of this Program EIR.

4.4.3 EXISTING SETTING

Paleontology

The Project area is underlain by relatively young alluvial fan deposits from erosion out of the San Gabriel Mountains to the north. These deposits consist of loosely consolidated alluvial gravel, sand, and silt originating from the San Gabriel Mountains. Because of its young age (i.e., very late Holocene or modern), the potential for yielding significant paleontological resources is very low. However, older (Quaternary age) alluvial fan deposits may be encountered during deeper excavations (e.g., tower and parking structure foundations). These sediments increase in age with depth, perhaps to early-late Pleistocene (older than 100,000 years) age. Elsewhere in the Los Angeles Basin, fossils are known from pit excavations for roads, housing projects, and quarries in similar deposits. Remains of extinct Ice Age animals such as mastodons, mammoths, horses, bison, camels, tapirs, sabertooth cats, sloths have been located during earth-moving activities in these formations (Psomas 2018).

Prehistory

The City of West Covina and the Project area are within the ancestral territory of the Gabrieliño/Tongva Indians. During prehistoric times, the area was occupied by the Gabrielino/Tongva as early as 500 BC in large, permanent villages in the fertile lowlands along rivers and streams and in sheltered areas along the coast. The Gabrielino/Tongva were hunter-gatherers and their territory eventually encompassed the greater Los Angeles Basin including the coast. They processed food resources in a variety of ways: nuts were cracked with hammer stone and anvil; acorns were ground with mortar and pestle; and seeds and berries with mano and metate. Yucca, an important resource in many areas, was eaten by the natives and exploited for its fibers. Their houses were circular domed structures of willow poles thatched with tule and were quite large, they could, in some cases, hold fifty individuals. Population estimates for the Gabrielino/Tongva are estimated around 10,000 individuals prior to European contact (Sutton et al and Wallace 1955).

Historic Times

Europeans arrived within the region by the 16th century. Spanish explorer Juan Rodriguez Cabrillo made a temporary landfall at the Chumash village of present-day Ventura on October 12, 1542. However, the end of the prehistoric era in Southern California is marked by the arrival of the Gaspar de Portolá overland expedition from New Spain (Mexico) and the founding of the first Spanish settlement at San Diego on July 16, 1769. Two of the 21 Franciscan missions established by the Spanish in Alta California had a profound impact on the Gabrielino/Tongva people: *Mission San Gabriel Arcángel* and *Mission San Fernando Rey de España*, both in Los Angeles County, which were founded in September 1771 and in 1797, respectively. The Gabrielino/Tongva were forced to resettle in the vicinity of the two missions and were decimated by the introduction of European diseases, such as measles and small pox, for which they had no immunity.

The Mexican Revolution, beginning in 1821, overthrew Spanish control and established Mexico as the new political power within the region. After Mexico's independence from Spain in 1822, Mexico secularized the Spanish missions in 1833 by repossessing the land and granting the land to soldiers, civil servants, and pioneers. In 1845, the Mexican Governor, Juan Bautista Alvarado, granted 48,780 acres, which included the present-day city of West Covina, to John Rowland and William Workman to raise cattle. Prior to 1900, the City of West Covina consisted of farm land for livestock because the area lacked dependable irrigation. However, the area quickly transitioned

to agricultural land after 1903 when a water well with a steam powered pump was added to facilitate irrigation.

During the 1840s, California saw an increasing influx of Anglo-Americans from the eastern United States. The American Period began with Mexico's defeat at the end of the Mexican-American War, resulting in the concession of California to the United States under the Treaty of Guadalupe Hidalgo on February 2, 1848. Only a few days before, gold was discovered on the American River which triggered the California Gold Rush.

Immigration into Southern California, including the area that encompasses the present-day City of West Covina, continued into the early 20th century when improved irrigation made the land desirable for crop farming. The City incorporated in 1923 and remained an agricultural community until the 1950s when landowners began to sell off portions of their lots to developers. During the 1960s, West Covina experienced an influx of residents seeking housing and employment within a flourishing regional community.

Urbanization in the City began in earnest in the early 1940s when the first housing tract was developed near the area bound by the Interstate 10, Orange Avenue, and Cameron Avenue. The historic aerials of the Project area illustrate the Project area was used as farmland well into the mid-1950s. By 1955, the community developed a school called Sunset School near the current Project site. Residential development started to surround the Project in the 1950s and continued flourishing into the 1960s. By 1965, the areas north and south of the Project area consisted of residential communities. Former farmland throughout the City had transitioned into suburban development by the early 1970s.

Queen of the Valley Hospital

In the late 1950s, the Immaculate Heart of Mary, an order of Catholic nuns, sent Sister Columba to West Covina to build a community hospital (QVH 2019). The Sisters used all the property they owned as collateral to purchase land for the hospital. This included their high school, college, library and even the Mother House in Los Angeles. In 1962, the Queen of the Valley Hospital in West Covina formally opened and is now a fully accredited nonprofit, Catholic health care facility (i.e., the Citrus Valley Medical Center).

Results of Database/Records Search

The NRHP database does not indicate any archaeological or historic resources within West Covina; however, the City has listed 31 built structures which it considers historically significant in a survey commissioned by the City (City of West Covina 2006). These resources are considered eligible to be listed on the California Register of Historic Places (CRHP) based on local significance. Of these 31 structures, one property, 1127 West Merced Avenue, is located within a half mile of the Project area. The structure is a two-story farmhouse built in 1909. The structure contains local significance for embodying the distinctive characteristics of early 20th century farmhouse architecture.

The results of the CHRIS records search identified 6 resources located within a half mile of the Project site (Table 4.4-1) all of which are 1-3 story commercial buildings. No archaeological or historical resources on the Project site itself. Additionally, 5 other cultural studies have been conducted within 0.5 miles of the Project boundaries (see Table 4.4-2).

**TABLE 4.4-1
ARCHAEOLOGICAL AND HISTORIC RESOURCES
NEAR THE PROJECT SITE**

Primary No.	Author (Year)	Description	Age	Approx. Location
P-19-188850	Michael Brandman Associates (2010)	Historic Structure: 1-3 Story Commercial Building First Federal Savings & Loan Assn. of Alhambra	Historic	0.5 mile
P-19-188938	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building West Covina Dental OHP Property Number - 168178	Historic	0.5 mile
P-19-188939	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building 2101 W Garvey Ave N	Historic	0.5 mile
P-19-188940	Caltrans (2001)	Historic Structure: 1-3 Story Commercial Building 1647-1649 W Garvey Ave. OHP Property Number - 168180	Historic	0.5 mile
P-19-188941	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building Trophy Center OHP Property Number - 168182	Historic	0.5 mile
P-19-188942	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building 1618 W. Harbert St. OHP Property Number - 168183	Historic	0.5 mile
Source: Psomas 2018				

**TABLE 4.4-2
ARCHAEOLOGICAL AND HISTORIC STUDIES
NEAR THE PROJECT SITE**

Report No.	Author (Year)	Title	Affiliation	Approx. Location
LA-02872	Robert J. Wlodarski and Dan Larson (1993)	Department of Transportation Negative Archaeological Survey Report Dpd-ep-25 (revised 2/83) Interstate 10 (I-10) Between Puente Avenue in the City of Baldwin Park on the West, and the Interchange Between I-10 and State Routes 57 (State Route 71/Interstate 210	Historical, Environmental, Archaeological, Research, Team.	0.5 mile
LA-02985	Chester King (1993)	Observation of Grading at Paramount Ranch Los Angeles County, California.	Topanga Anthropological Consultants.	0.5 mile
LA-07098	Michael Dice (2003)	Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate La59xc009b (car Quest) 1705 Garvey Avenue, West Covina, Los Angeles County, California	Michael Brandman Associates	0.5 mile
LA-10190	Claudia Herbert (2002)	Supplemental Historic Property Survey Report for the I-10 HOV Lane Between I-605 and the SR-57/SR-71/I-210 Interchange in the Cities of Los Angeles, Baldwin Park, West Covina, Covina, San Dimas, and Pomona in Los Angeles County, CA	Caltrans	0.5 mile
LA-10658	Wayne Bonner and Kathleen Crawford (2010)	Cultural Resources Records Search, Site Visit Results, and Direct APE Historic Architectural Assessment for Clearwire Candidate CA-LOS6255C (SILAGI), 1400 West Covina Parkway, West Covina, Los Angeles County, California	Michael Brandman Associates	0.5 mile
Source: Psomas 2018				

4.4.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on cultural resources if it will do any of the following:

- Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?
- Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

4.4.5 ENVIRONMENTAL IMPACTS

Threshold 4.1	Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?
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As indicated by the City's General Plan EIR and South Central Coastal Information Center (SCCIC) record check, there are no known historical sites located on the Project area or in the immediately surrounding area. This assessment is based on the results of a search of the National Register database and a record check through the California Historic Resources Inventory System (CHRIS). The City of West Covina has listed 31 built structures considered significant through a 2006 survey assessment commissioned by the City of West Covina. These resources are considered eligible to be listed on the California Register of Historic Places (CRHP) based on local significance. Of these 31 structures, one property, 1127 West Merced Avenue is located within a half mile of the Project area. The structure is a two-story farmhouse built in 1909. The structure contains local significance for embodying the distinctive characteristics of early 20th century farmhouse architecture. However, the Project will not result in any direct or indirect effects on the property. Since there are no known historic resources located within the Project area, the Project will not cause a substantial change in the significance of a historical resources. Thus, impacts in this regard are less than significant and no mitigation is required.

Threshold 4.2	Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?
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PlanWC, "Our Creative Community" Section, Sub-Section D, Celebrate and Promote West Covina's Cultural Assets. This policy contains the following policy and action:

Policy 7.7 Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and Assembly Bill 52 and Senate Bill 18 for consultation with Native American tribes for development projects carried out within the City.

Action 7.7 Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

However, the City's Municipal Code does not contain any specific sections or codes relative to cultural, archaeological, or paleontological resources.

As indicated by the City's General Plan EIR, there are no known archaeological sites located within the Project area or in the immediately surrounding area. According to available information, the potential for Project-related grading to have significant impacts on archaeological resources is considered low; however, there is a possibility that unknown archaeological artifacts or resources may be encountered during grading. This is a potentially significant impact that requires mitigation, consistent with PlanWC Policy 7.7 and Action 7.7. In addition, issues related to NA tribal resources are also addressed in Section 4.14, *Tribal Cultural Resources*, which contains additional mitigation based on input from local tribal representatives.

Mitigation Measures

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

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

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

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

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

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

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

plan, according to the current professional repository standards and may include a culturally affiliated tribal curatorial facility.

Summary of Impact. The proposed Project has a potential to impact unknown archaeological resources but implementation of Mitigation Measures CUL-1 through CUL-3 would reduce this impact to a less than significant level, consistent with PlanWC's policies and actions.

Threshold 4.3	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
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As previously indicated, Policy 7.7 and Action 7.7 in the PlanWC, "Our Creative Community" Section, Sub-Section D, Celebrate and Promote West Covina's Cultural Assets, address the identification and protection of paleontological resources.

However, the City's Municipal Code does not contain any specific sections or codes relative to cultural, archaeological, or paleontological resources.

According to the *PlanWC's* Resource Conservation Element, soils and geologic formations within the City, including the Project area, have a low potential to contain significant paleontological resources. Searches of PaleoBioDB, NEOMAP, and a database of Late Pleistocene vertebrate localities for California (Jefferson 1991) indicate that no fossil localities have been previously recorded within one mile of the Project site. Paleontological resources are not anticipated to be discovered during excavation in younger (Holocene) alluvial fan deposits. However, it is possible that grading in older alluvial materials (i.e., Quaternary) could impact previously undiscovered paleontological resources. This is a potentially significant impact that requires mitigation.

Mitigation Measures

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

Summary of Impact. The proposed Project has the potential to significantly impact unknown paleontological resources, but implementation of Mitigation Measure CUL-4 would reduce this potential impact to a less than significant level, consistent with the City's General Plan policies and actions.

Threshold 4.4	Would the project disturb any human remains including those interred outside of formal cemeteries?
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If human remains are found, state law requires proper treatment for the remain in accordance with applicable regulations. Sections 7050.5–7055 of the *California Health and Safety Code* describe the general provisions for dealing with human remains. Specifically, Section 7050.5 of

the *California Health and Safety Code* describes the protocols to be followed in the event that human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. Although there is no indication that human remains are present within the Project area, Project-related grading has the potential to unearth previously undiscovered human remains. This represents a potentially significant impact that requires mitigation consistent with state regulations.

Mitigation Measures

CUL-5 If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code*. The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner.

Summary of Impact. If Project-related grading exposes buried human remains, implementation of Mitigation Measure CUL-5 and compliance with existing regulations would ensure that any impact in this regard are reduced to a less than significant level.

4.4.6 CUMULATIVE IMPACTS

Direct impacts to on-site cultural resources are site-specific. The proposed Project could lead to accelerated degradation of previously unknown historical, archaeological, and paleontological resources. As such, impacts may be considered cumulative simply because they relate to the loss of cultural resources in general over time throughout the region. Based on the National Register, there are no cultural resources listed or determined eligible for listing. However, the Project and its surrounding area may contain unknown resources. Should unknown resources be identified, ground disturbance activities could lead to the accelerated degradation of significant cultural resources. These impacts can be reduced to a less than significant level by implementing appropriate mitigation on a project by project basis, similar to those measures recommended for the proposed Project.

4.4.7 IMPACTS OF MITIGATION MEASURES

Implementation of Mitigation Measures CUL-1 through CUL-5 have the potential to delay grading and construction of Project-related improvements but would not in and of themselves result in any significant impacts that have not already been identified and analyzed in this Program EIR.

4.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to cultural resources would be reduced to less than significant levels after implementation of the recommended mitigation measures CUL-1 through CUL-5.

4.4.9 REFERENCES

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4.5 GEOLOGY AND SOILS

This section describes the existing geology and soils on the Queen of the Valley Hospital Specific Plan (QVHSP) Project site and analyzes the potential impacts of existing geotechnical hazards that may adversely affect the proposed Project or may be exacerbated by Project implementation. Information presented in this section is derived primarily from the *Geotechnical Exploration Report Citrus Valley Medical Center Queen of The Valley Campus 1115 South Sunset Avenue West Covina, California* (Leighton 2011), West Covina General Plan 2016 (PlanWC), West Covina Natural Hazard Mitigation Plan (NHMP) and the City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR.

Comment letters submitted on the Notice of Preparation (NOP) did not raise any issues related to geology and soils.

4.5.1 RELEVANT POLICIES AND REGULATIONS

State

Alquist-Priolo Earthquake Fault Zoning Act

The 1971 San Fernando Earthquake in Southern California resulted in the enactment of the Alquist-Priolo Special Studies Zones Act of 1972. The Act was renamed in 1994 to the Alquist-Priolo Earthquake Fault Zoning (A-P) Act. Land subdivisions and habitable structures consisting of four units or more that are proposed within A-P zones are required to have detailed fault investigations performed so that engineering geologists can mitigate the hazards associated with active faults. The boundary of the fault zone is approximately 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The State Geologist defines an active fault as a fault that has previously had surface displacement within the Holocene Period (i.e., the last 11,000 years). A potentially active fault is defined as any fault that has had surface displacement during Quaternary time (within the last 1,600,000 years) but not within the Holocene Period. The latest available data from the California Geological Survey (CGS) indicates there are no Alquist-Priolo Fault Zones or other earthquake faults beneath or adjacent to the QVH campus (CGS 2015).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (*California Public Resources Code*, Sections 2690-2699.6) directs the State of California Department of Conservation to identify and map areas subject to earthquake hazards (such as liquefaction, earthquake-induced landslides, and amplified ground shaking). A product of the resultant Seismic Hazards Mapping Program, Seismic Zone Hazard Maps identify Zones of Required Investigation, which are those areas prone to liquefaction and earthquake-induced landslides. The Seismic Hazards Mapping Act requires site-specific geotechnical investigations be conducted within the Zones of Required Investigation to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. The U.S. Geological Survey (USGS) quadrangle that includes the Project site has not yet been mapped pursuant to the Seismic Hazard Mapping Act; however, based on available information in the PlanWC, discussed below, the Project site is not in a liquefaction or earthquake-induced landslide hazard area.

California Building Code

The *California Building Code* (CBC) is promulgated under the *California Code of Regulations* (CCR), Title 24, Parts 1 through 12 (also known as the *California Building Standards Code*) and is administered by the California Building Standards Commission (CBSC). The CBSC is responsible for administering California's building codes, including adopting, approving, publishing, and implementing codes and standards. The CBC is a compilation of three types of building standards from three different origins:

Standards adopted by State agencies without change from the national model codes

Standards adopted and adapted from the national model code standards to meet California conditions

Standards authorized by the California legislature that constitute extensive additions not covered by the national model codes and adopted to address concerns particular to California

The national model code standards (i.e., the *International Building Code*) adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The current version of the CBC is the 2016 triennial edition, which became effective on January 1, 2017, and is generally updated every three years.

Local

West Covina General Plan

"Our Healthy and Safe Community" Chapter of PlanWC provides a proactive approach to public health and safety planning. The purpose of the Chapter is to identify and limit the exposure of the community to potential natural and manmade hazards. Specifically, it identifies potential known hazards related to geology and soils, including geologic and seismic hazards (West Covina 2016a). PlanWC policies and actions related to Geology and Soils require all development to comply with the provisions of the latest CBC, including provisions related to suitable design and engineering to reduce potential impacts from seismic events. The consistency of the proposed Project with goals and policies related to seismic and geologic hazards is discussed in Section 4.9, *Land Use and Planning*, of this Program EIR.

West Covina Natural Hazard Mitigation Plan

The City of West Covina Natural Hazards Mitigation Action Plan (NHMP) includes resources and information to assist City residents, public and private sector organizations, and others interested in participating in planning for natural hazards. The NHMP is updated every five years to reflect changing conditions and advances in availability of information related to natural hazards. The mitigation plan provides a list of activities to assist the City of West Covina in reducing risk and preventing loss from future natural hazard events. The action items address multi-hazard issues, as well as activities for earthquakes, earth movements, flooding, wildfires and windstorms (West Covina 2018a).

West Covina Building Regulations

Building regulations in West Covina are specified in Title 7, Buildings and Building Regulations, of the Municipal Code, which adopts the 2016 Edition of the CBC. Building construction is governed by the CBC; however, utilizing the CBC, the Building Section is responsible for insuring that all private developments within the City conform to construction and safety standards through plan review, permit issuance, and inspection.

4.5.2 METHODS

Findings, conclusions, and recommendations (as presented in previously published geotechnical reports) were updated and/or modified, as necessary, to reflect the existing site conditions and to incorporate current applicable CBC criteria. In order to provide a technical evaluation of the geologic setting of the site and to provide geotechnical design recommendations for the proposed development, a review of available geotechnical literature, reports, maps, and agency information pertinent to the study area was completed.

4.5.3 EXISTING SETTING

Regional and Local Geology

The City of West Covina is located in the San Gabriel Valley approximately 17 miles east of Downtown Los Angeles. The proposed Project lies entirely within the Peninsular Ranges geomorphic province. This geomorphic province occupies the southwestern corner of California and contains the Laguna Mountains, the San Jacinto Mountains, the Santa Ana Mountains, and the Santa Rosa Mountains. The northern portion of the province includes the Los Angeles Basin and is bound on the east by the Colorado Desert and on the north by the transverse ranges, including the San Gabriel Mountains (West Covina 2016b). The Project site is located near the northern end of the Peninsular Ranges Geomorphic Province, which is characterized by numerous small, northwestern-trending mountain ranges with intervening plains and valleys. The Peninsular Ranges province abuts to the north against a series of east-west-trending mountain ranges, which are collectively referred to as “the Transverse Ranges”.

The Project site is located approximately six miles south of the base of the San Gabriel Mountains, which make up the central portion of the Transverse Ranges. The erosion of mountains in the Transverse Ranges have deposited a thick blanket of geologically recent, coarse-grained, alluvial sediments (e.g., deposited by running water). Coarser sands and gravels are present below the surficial eolian deposits that represent alluvial materials derived from the mountains to the north. Sedimentary deposits in this area are thought to be on the order of 1,300 to 1,350 feet thick.

The topography of the City is characterized primarily by relatively flat alluvial plains in the northwest and steeper slopes associated with the San Jose Hills in the southeast. Elevation within the City ranges from approximately 320 feet in the lowlands to approximately 1280 feet in the hills. Most of the City is urbanized, and the majority of the land surface is covered in structures and pavement, which limits the extent of exposed surface soils. These dominant soil orders consist of sandy gravel, sandy silt, sandy clay, silty clay, and clay (City of West Covina, 2016b). The Queen of the Valley campus is currently underlain by thick accumulations of sand, silt, gravel, cobbles, and boulders eroded from the mountains and deposited in the site vicinity by the San Gabriel River and smaller tributaries such as the Dalton Wash and Walnut Creek (Leighton 2011).

Artificial fill of varying thickness is likely to blanket most of the Project site (Leighton 2011). Borings excavated as part of our geotechnical exploration ranged from roughly 3 to 7 feet bgs consisting of soft to stiff sandy silt. The Quaternary age alluvial soils encountered onsite consist predominately of gravels and sands of brown to orange brown, loose to dense, fine to coarse sands with gravels interbedded with layers of soft to stiff, brown, slightly moist sandy clayey silts. Larger size particles, including cobbles and boulders, have potential to be found on site. The sandy soils typically have low expansion potential. The clays and silts typically have medium to very high expansion potential (Leighton 2011).

Faulting and Seismicity

No active or potentially active faults are known to exist on or within the Project site, and the site is not in a current State of California Earthquake Fault Zone (Leighton 2011, CGS 2015). However, as with all of Southern California, the Project site lies in a seismically active region a major earthquake occurring along any of these faults would be capable of generating seismic hazards and strong ground shaking effects within the City. In addition to regional faults, there are several local faults located within or near the City that are considered potentially active. The closest faults to the Project site, which traverse the City of West Covina, include the Indian Hill fault located approximately four miles to the northeast, Walnut Creek fault located approximately two miles to the south and San Jose Fault located approximately four miles to the southeast (refer to Exhibit 4.5-1).

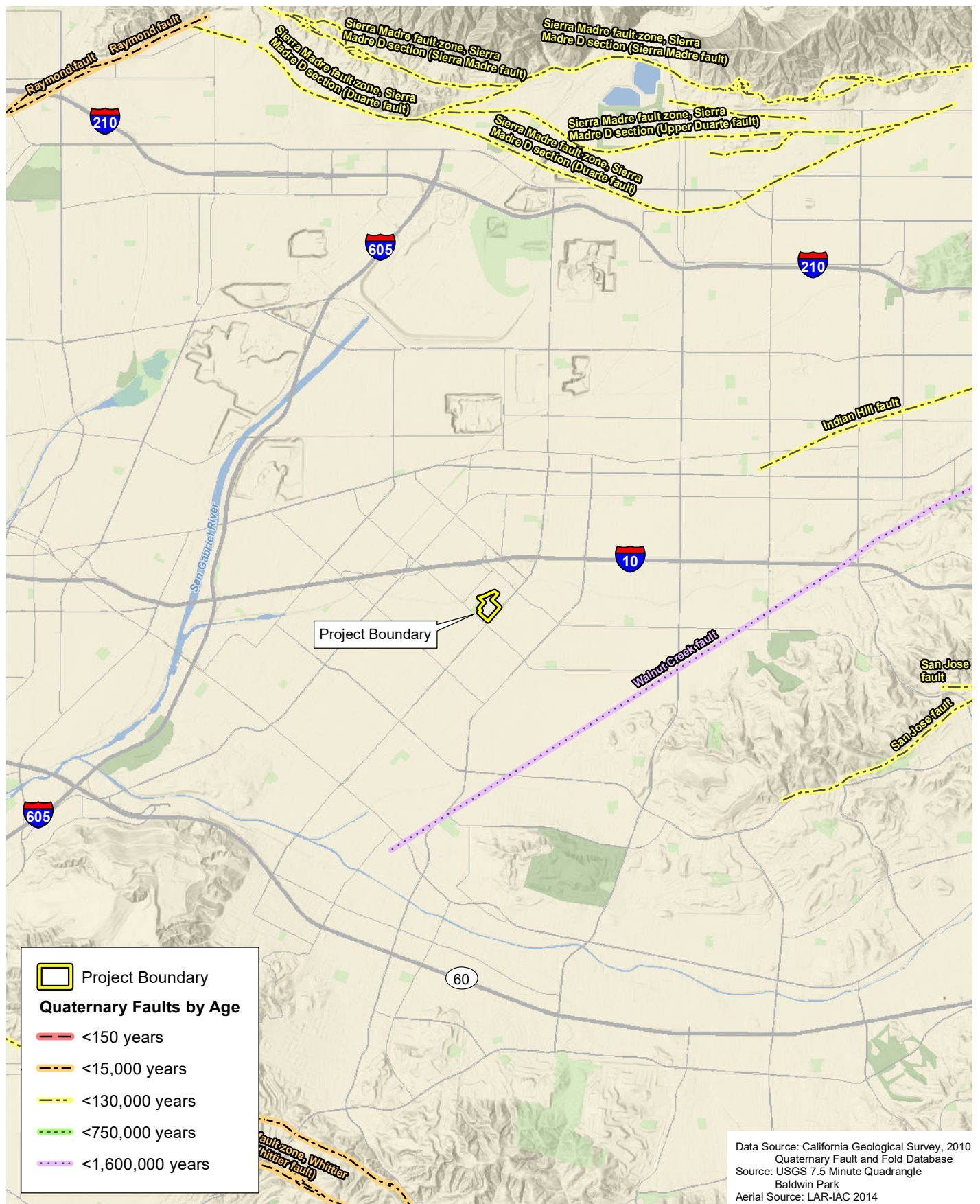
Indian Hill Fault is located just northeast of the City and runs in an east/west direction for approximately 5.6 miles. It is believed to be a single strand and is considered potentially active. This fault serves as a barrier to groundwater movement and offsets soils of Late Pleistocene age, which is the reason it is considered potentially active (West Covina 2016b).

San Jose Fault is classified as potentially active and is located in the San Jose Hills, just east of the City. The fault is approximately 13 kilometers long and runs in a northeast/southwest direction, approximately parallel to the Interstate (I)-10 freeway. The fault has an 80 to 85-degree upward dip and has a reverse movement with the north side up. The fault displaces upper Miocene sedimentary and volcanic rocks as much as 2,700 feet vertically, with a 100-meter vertical offset in older subsurface alluvium (West Covina 2016b).

Walnut Creek Fault runs southwest to northeast and roughly divides the City, following the northern boundary of the San Jose Hills. This fault is potentially active and is classified as a Quaternary fault of undifferentiated age. This fault is concealed and surface rupture along is unlikely, but the fault does serve as a sub-surface water barrier within Quaternary alluvium (West Covina 2016b).

Table 4.5-1, *Summary of Regional Faults*, shows the nearest faults to the Queen of the Valley Hospital campus and the expected maximum magnitude earthquake expected on each fault. The probability of earthquake activity within the local faults is considered the highest along the San Jose Fault. However, no local faults on the vicinity of the Project site have been placed in an Alquist-Priolo Earthquake Fault Zone. Thus, no surface fault rupture hazard is anticipated along the fault traces that pass through or near the City (West Covina 2016b; CGS 2015).

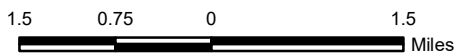
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Earthquake, Faults, and Hazard Zones

Exhibit 4.5-1

Queen of the Valley Hospital Specific Plan EIR



**TABLE 4.5-1
SUMMARY OF REGIONAL FAULTS**

Fault Name and Section	Maximum Moment Magnitude (Mmax)
San Jose	6.5
Whittier	7.2
Sierra Madre	6.8
Elysian Park Blind Thrust	6.7
Chino-Central Ave. (Elsinore)	6.7
Cucamonga	7.0
Hollywood-Santa Monica	6.4
Newport-Inglewood	6.9
San Andreas (1857)	7.8
San Jacinto – San Bernardino	6.7
San Andreas (Southern)	6.7
San Andres (San Bernardino)	7.4
Newport-Inglewood (offshore)	6.9
Malibu Coast	6.7
San Jacinto (San Jacinto Valley)	6.9
Elsinore	6.8
Source: Leighton 2011.	

Seismic Hazard Zones

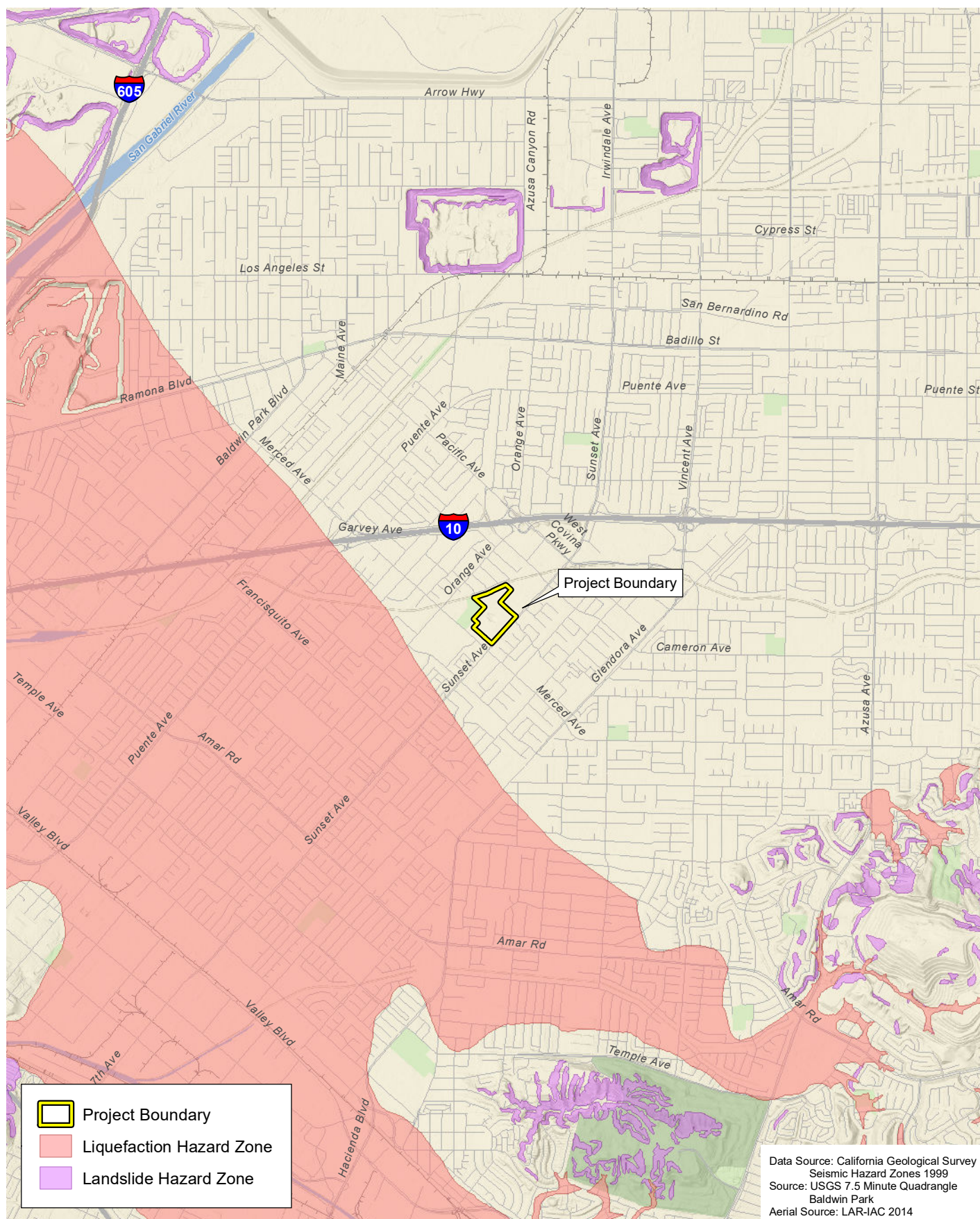
Liquefaction is the loss of soil strength or stiffness due to a buildup of water pressure between soil particles during severe ground shaking. Liquefaction hazard areas are areas where historic occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions, indicate a potential for permanent ground displacements such that mitigation would be required. This condition is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils that often make up alluvial materials. According to the City of West Covina NHMP, the Project site is not located within a liquefaction or landslide hazard area (refer to Exhibit 4.5-2) (West Covina 2016b). Additionally, the Project site is in an area with no significant slopes (Leighton 2011).

It should be noted the Project will allow for new construction to meet State Occupational Safety and Health Administration (OSHA) requirements so the critical care uses can continue within the campus without the need to perform significant seismic upgrades to the hospital building.

Groundwater

Surface water can be expected to drain from the site as sheet-flow from the northern region of the site during rainy periods toward the lower elevations to the south. According to California Geological Survey (1998), historic high groundwater elevations below the site are greater than 50 feet below existing ground surface (bgs). Further, no groundwater was encountered during previous site-specific exploration (Leighton 2011).

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Liquefaction and Landslide Hazards

Exhibit 4.5-2

Queen of the Valley Hospital Specific Plan EIR



4,000 2,000 0 4,000
Feet

4.5.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to geology and soils if it will:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- Result in substantial soil erosion or the loss of topsoil.
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- Be located on expansive soil, as defined in Table 18-1-B of the *Uniform Building Code*, creating substantial risks to life or property.
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

4.5.5 ENVIRONMENTAL IMPACTS

Threshold 5.1(i)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
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The QVH campus, as with Southern California as a whole, may experience strong ground shaking from a major earthquake on active regional faults in the Southern California area. No known active or potentially active faults traverse the campus, and the campus is not included in an Alquist-Priolo Earthquake Fault Zone (Leighton 2011). Since no known active or potentially active faults traverse the QVH campus, the Project would result in no impacts due to risk of loss, injury, or death involving fault rupture of a known earthquake fault, and no mitigation is required.

Threshold 5.1(ii)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (ii) Strong seismic ground shaking?
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As discussed above, the Project site is situated in a seismically active region. Based on consideration of the major active faults in the area and on historical seismicity, the proposed uses at the Project site may be subject to moderate to large seismic events, resulting in strong seismic ground shaking. The primary geologic hazard in the Project area is seismic ground shaking.

The nearest known active fault is the San Jose fault, located approximately four miles to the southeast. According to the City of West Covina NHMP, moderate to severe ground shaking may be expected within the City, including the Project site, due to the proximity of the San Jose fault which is located along the southern edge of the City and approximately four miles to the southeast of the QVH campus, as well as the major active faults in the area.

The nearest known active major fault, located approximate 13 miles from the QVH campus, is the Cucamonga frontal thrust fault, which is capable of producing a 7.0 magnitude event along the mountain front. The nearest active local fault, approximately 4 miles from the site, is the San Jose fault, capable of producing a 6.5 magnitude event (see Table 4.5-1). While other active faults (regional faults) in the area are located further from the site, they may have a greater potential to produce earthquakes of higher magnitudes (West Covina 2018a). The possibility of ground acceleration or shaking on any part of the campus, including any areas to be developed in the future under the proposed Queen of the Valley Specific Plan (QVHSP), is similar to that for all of Southern California and is considered a potentially significant impact that requires mitigation.

Mitigation Measures

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

Implementation of MM GEO-1 requires a site-specific Geotechnical Report to determine appropriate site and building designs, which would reduce potential impacts related to soil and geologic constraints to less than significant levels. In addition, the proposed Project would comply with applicable local and State regulatory requirements. Compliance with applicable regulatory requirements, and incorporation of site-specific geotechnical recommendations into the design and construction of the Project would ensure that people and/or structures would not be exposed to potential substantial adverse effects from strong seismic groundshaking.

Summary of Impacts. With adherence to applicable regulatory requirements, and future site-specific geotechnical investigations as outlined in Mitigation Measure GEO-1, the Project would have less than significant impacts related to strong ground shaking.

Threshold 5.1(iii)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (iii) Seismic-related ground failure, including liquefaction?
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According to the City of West Covina NHMP, the Project site is not located within a designated Liquefaction Hazard Zone (West Covina 2018a), and thus is not located in an area susceptible to liquefaction. Liquefaction and dynamic settlement of soils can be caused by strong ground motion due to earthquakes. Research and historical data indicate that loose, saturated granular soils are most susceptible to liquefaction (Leighton 2011). As previously discussed, according to California Geological Survey (1998), historic high groundwater elevations below the site are greater than 50

feet below existing ground surface (bgs). Further, no groundwater was encountered during previous site-specific exploration (Leighton 2011). Therefore, because of the relatively dense nature of the underlying granular material and lack of a shallow groundwater table, potential for liquefaction is low (Leighton 2011). Therefore, the potential for seismically induced settlement is also considered low. The Project would result in less than significant impacts related to seismic-related ground failure, and no mitigation is required.

Threshold 5.1(iv)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (iv) landslides?
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According to the City of West Covina NHMP, and State of California Seismic Hazards Zones Map for the Baldwin Park Quadrangle, the site is not located within a Landslide Zone, and thus is not within an area potentially susceptible to earthquake induced landslides (West Covina 2018a, CGS 2018). Additionally, the Project site is in an area with no significant slopes, thus the potential for seismically-induced slope instability is considered low (Leighton 2011). Therefore, the potential for seismically induced landslides is considered low and less than significant impacts, and no mitigation is required.

Threshold 5.2	Would the project result in substantial soil erosion or the loss of topsoil?
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Ground disturbance during grading and construction could lead to erosion and topsoil loss during wind or rain events, resulting in a potentially significant impact. Development projects that disturb one acre or more of land are required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In compliance with the NPDES permit, erosion potential during construction activities would be managed with Best Management Practices (BMPs) implemented at each construction site as part of a Storm Water Pollution Prevention Plan (SWPPP) during construction activities to minimize erosion impacts. As part of the SWPPP, erosion and sediment control BMPs would be required as discussed in Section 4.8, *Hydrology and Water Quality*, of this Program EIR. In addition to the requirements of the NPDES General Construction Permit, Mitigation Measure HYD-1 in Section 4.8, *Hydrology and Water Quality*, requires that individual projects incorporate permanent storm water management features that would collectively meet the requirements set forth in the Low Impact Development (LID) Manual and include permanent BMPs that would reduce loose soils, sediment, and other pollutants from storm water runoff. The Project would also have to comply with the grading regulations of the City of West Covina, which would reduce erosion during construction and operation. This is a potentially significant impact requiring mitigation.

Mitigation Measures

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

Compliance with the NPDES Construction General Permit, Mitigation Measure HYD-1 and City of West Covina grading requirements, as outlined in Mitigation Measure GEO-2, would reduce

erosion and sedimentation during construction and long-term operations (West Covina 2018b). Therefore, Project-related storm water quality impacts resulting from erosion during construction and long-term operations would be less than significant after mitigation.

Summary of Impacts. With adherence to City, regional, and State regulations related to management of windblown dust and other sources of soil erosion, as required in Mitigation Measures HYD-1 and GEO-2, the Project would have a less than significant impact related to soil erosion during construction and no impact during operation of the Project.

Threshold 5.3	Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?
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Seismic-related ground failure, including liquefaction and settlement, is addressed under Threshold 5.1(ii). In addition, as addressed under Threshold 5.1(iv), the site is not located within a Landslide Zone and in an area with significant slopes. Lateral spreading is a liquefaction-related phenomenon; as there is no risk of liquefaction, there would be no risk of lateral spreading.

Ground subsidence is the gradual settling or sinking of the ground, usually associated with the extraction of oil, gas, or ground water from below the ground surface, or the organic decomposition of peat deposits, with a resultant loss in volume. The City of West Covina is not located within an area of land subsidence (USGS 2018) and is therefore not considered a significant source of unstable soil for the proposed Project. Thus, impacts related to soil instability would be less than significant.

Further, any potential impacts related to unstable soil would be reduced with implementation of Mitigation Measure GEO-1, requiring site-specific geotechnical investigations and Mitigation Measure GEO-2, requiring approval of the final grading plan, appropriate certifications, and compaction reports per the City of West Covina grading requirements. In addition, the proposed Project would comply with applicable local and State regulatory requirements. Therefore, potential impacts related to onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant and further reduced with implementation of Mitigation Measure GEO-1 and GEO-2.

Summary of Impacts. Impacts related to instability of the site's geologic materials would be less than significant. With adherence to applicable regulatory requirements, and future site-specific geotechnical investigations and grading plan submittals (Mitigation Measures GEO-1 and GEO-2), potential Project-related impacts relative to unstable soils, if encountered on the site, would be further reduced to less than significant levels.

Threshold 5.4	Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
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The Quaternary age alluvial soils encountered during previous onsite geotechnical exploration consist predominately of gravels and sands. Based on previous site-specific geotechnical exploration, the majority of the onsite soils are granular and have low expansion potential (Leighton 2011). Therefore, specialized construction procedures to resist expansive soil activity are not anticipated. However, prior to mitigation, the potential to encounter expansive soil is considered a potentially significant impact. Supplemental investigation of the expansion potential

of on-site soils or imported soils during preparation of site-specific geotechnical investigations is required along with subsequent grading plan submittals. With implementation of Mitigation Measures GEO-1 and GEO-2, and compliance with applicable regulatory requirements, potential impacts related to expansive soils would be less than significant.

Summary of Impacts. With adherence to applicable regulatory requirements, and future site-specific geotechnical investigations and grading plan submittals, as outlined in Mitigation Measures GEO-1 and GEO-2, there would be less than significant impacts related to expansive soils if encountered on the site.

Threshold 5.5	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
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The QVH campus has a piped sewage collection system that conveys wastewater off site for treatment and disposal. No areas on the campus contain existing or past septic systems or improvements; therefore, no impact would occur, and no mitigation is required.

4.5.6 CUMULATIVE IMPACTS

Geology and soils impacts are generally site-specific, and there is typically little, if any, cumulative relationship between the development of a project and development within a larger cumulative area (e.g., city-wide development). For example, development at the Project site would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or settlement) at other locations; therefore, the proposed Project would not directly affect the level of intensity at which a seismic event or geologic hazard on an adjacent site is experienced. However, development of the proposed Project and future development projects in the City may expose more persons to seismic hazards.

The proposed Project and any future development projects would be required to comply with applicable State and local requirements, such as the City's Building Regulations and applicable CBC, the City's grading standards, and requirements for erosion control. As with the proposed Project, future development projects would be required to prepare site-specific geotechnical investigations to identify the geologic and seismic characteristics of those sites and to provide recommendations for engineering design and construction. These recommendations would be incorporated into the design of those projects, similar to the recommendations outlined in Mitigation Measure GEO-1 for the proposed Project. Additionally, future grading plan submittals would be required for other projects within the City, as outlined in Mitigation Measure GEO-2 for the Project. Compliance of individual projects with the recommendations of the applicable geotechnical investigations would prevent hazards associated with unstable soils, landslide potential, lateral spreading, liquefaction, soil collapse, expansive soil, soil erosion, and other geologic issues. Therefore, the Project's contribution to cumulative geology and soils impacts would be less than significant with project-specific mitigation.

4.5.7 IMPACT OF MITIGATION MEASURES

Implementation of Mitigation Measures GEO-1 and GEO-2 may slightly delay construction to provide the necessary geotechnical reports and plan certification, but their implementation is not expected to have any adverse impacts in and of themselves on the environment.

4.5.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With adherence to regulatory requirements and incorporation of Mitigation Measures GEO-1 and GEO-2, the proposed Project would have less than significant impacts related to geology and soils.

4.5.9 REFERENCES

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4.6 GREENHOUSE GAS EMISSIONS

The following discussion addresses potential impacts related to the Project's generation of greenhouse gas (GHG) emissions either directly or indirectly, and the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. This analysis addresses the proposed Queen of the Valley Hospital (QVH or Hospital) on-site development and associated hospital and infrastructure improvements described in Section 3.0, *Project Description*.

A Notice of Preparation (NOP) comment letter was submitted by the South Coast Air Quality Management District (SCAQMD) regarding data, methodologies, and mitigation for potential air quality impacts including GHG emissions. Air quality impacts related to criteria air pollutants are addressed in Section 4.2, *Air Quality*, of this Program EIR. NOP comment letters are included in Appendix B of this Program EIR.

4.6.1 RELEVANT POLICIES AND REGULATIONS

Greenhouse Gas Emissions are global pollutants and are therefore unlike criteria air pollutants such as O₃, particulate matter (PM₁₀ and PM_{2.5}), and toxic air contaminants (TACs), which are pollutants of regional and local concern. While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions. An evolving body of laws, regulations, and case law governs climate change and GHG emissions in California. Below are summaries of some of the key regulations; however, in no way is the discussion below exhaustive of this ever-growing body of regulation. While there are a number of international treaties and agreements regarding GHG emissions, the focus of this analysis will be on federal, state, and regional laws and guidelines within the United States that apply to activities in California.

Federal

In 2002, President Bush set a national policy goal of reducing the GHG emission intensity (tons of GHG emissions per million dollars of gross domestic product) of the U.S. economy by 18 percent by 2012 (NOAA 2002). The goal did not establish any binding reduction mandates. Rather, the United States Environmental Protection Agency (USEPA) began to administer a variety of voluntary programs and partnerships with industries that produce and utilize synthetic gases to reduce emissions of particularly potent GHGs.

The Bush Administration's approach to addressing climate change was challenged in *Massachusetts et al. v. Environmental Protection Agency*, 549 US 497 (2007). In this decision, the U.S. Supreme Court held that the USEPA was authorized by the Clean Air Act to regulate CO₂ emissions from new motor vehicles. (MASS). The Court did not mandate that the USEPA enact regulations to reduce GHG emissions but found that the only instance in which the USEPA could avoid taking action was if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change.

On December 7, 2009, the USEPA issued an "endangerment finding" under the Clean Air Act (CAA), concluding that GHGs threaten the public health and welfare of current and future generations and that motor vehicles contribute to greenhouse gas pollution (USEPA 2013). These findings provide the basis for adopting new national regulations to mandate GHG emission

reductions under the federal CAA. The EPA's endangerment finding paved the way for federal regulation of GHGs.

It was expected that Congress would enact GHG legislation, primarily for a cap-and-trade system. However, proposals circulated in both the House of Representatives and Senate were controversial and it may be some time before Congress adopts major climate change legislation. Under the Consolidated Appropriations Act of 2008 (HR 2764), Congress has established mandatory GHG reporting requirements for some emitters of GHGs. In addition, on September 22, 2009, the USEPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the USEPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons or more per year of GHGs.

State

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

The principal overall State plan and policy adopted for the purpose of reducing GHG emissions is Assembly Bill (AB) 32 (California Global Warming Solutions Act of 2006). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 recognizes that California is the source of substantial amounts of GHG emissions. The statute states the following:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

In order to avert these consequences, AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020, codifying the Executive Order S-3-05 goal.

California Air Resources Board (CARB) approved a *Climate Change Scoping Plan* as required by AB 32 in 2008; this plan is required to be updated every five years. The *Climate Change Scoping Plan* proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health” (CARB 2008). The *Climate Change Scoping Plan* has a range of GHG-reduction actions, which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation regulation to fund the program. On February 10, 2014, CARB released the Draft Proposed First Update to the *Climate Change Scoping Plan* (CARB 2014). The board approved the final *First Update to the Climate Change Scoping Plan* on May 22, 2014. The first update describes California's progress toward AB 32 goals, stating that “California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014). The latest update occurred in January 2017 and incorporates the 40-percent reduction to 1990 emissions levels by 2030.

California Executive Order (EO) B-30-15 (April 29, 2015) set an “interim” statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030 and directed State agencies with jurisdiction over GHG emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels.

On September 8, 2016, the Governor signed Senate Bill (SB) 32 to codify the GHG reduction goals of EO B-30-15, requiring the State to reduce GHG emissions by 40 percent below 1990 levels by 2030 (Health and Safety Code Section 38566). This goal is expected to keep the State on track to meeting the goal set by EO S-3-05 of reducing GHG emissions by 80 percent below 1990 levels by 2050 (California Legislative Information 2017a). SB 32's findings state that CARB will “achieve the state’s more stringent greenhouse gas emission reductions in a manner that benefits the state’s most disadvantaged communities and is transparent and accountable to the public and the Legislature.”

AB 197 was signed at the same time and will make sure that the SB 32 goals are met by requiring CARB to provide annual reports of GHGs, criteria pollutants, and TACs by facility, City and subcounty level, and sector for stationary sources and at the County level for mobile sources. It also requires the CARB to prioritize specified emission reduction rules and regulations and to identify specified information for emission reduction measures (e.g., alternative compliance mechanism, market-based compliance mechanism, and potential monetary and nonmonetary incentive) when updating the Scoping Plan (California Legislative Information 2017b).

On April 29, 2015, Governor Brown signed EO B-30-15, which orders “A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050” (COOG 2015). Five key goals for reducing GHG emissions through 2030 include (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; (3) reducing petroleum use in cars and trucks by up to 50 percent; (4) reducing emissions of short-lived climate pollutants; and (5) managing farms, rangelands, forests and wetlands to increasingly store carbon. EO B-30-15 also directs CARB to update the *Climate Change Scoping Plan* to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are as follows (California Legislative Information 2015):

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation

The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources.

The Sustainable Communities and Climate Protection Act of 2008, SB 375, established a process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 required Southern California Association of Governments (SCAG) to incorporate a “Sustainable Communities Strategy” (SCS) into its regional transportation plans (RTPs) that will achieve GHG emission reduction targets through several measures, including land use decisions. SCAG’s SCS is

included in the SCAG 2016–2040 RTP/SCS (SCAG 2016). The goals and policies of the RTP/SCS that reduce vehicle miles traveled (VMT) focus on transportation and land use planning that include building infill projects; locating residents closer to where they work and play; and designing communities to have access to high quality transit service.

California Environmental Quality Act Guidelines

Senate Bill 97 (CEQA Guidelines)

SB 97 required Governor's Office of Planning and Research (OPR) to prepare amended California Environmental Quality Act (CEQA) Guidelines for submission to the California Natural Resources Agency (CNRA) regarding GHG analysis and feasible mitigation of the effects of GHG emissions as required by CEQA. These amendments became effective as of March 18, 2010. The adoption of SB 97 and subsequent CEQA amendments are widely recognized as confirmation that lead agencies are required to include an analysis of climate change impacts in CEQA documents.

CEQA Guidelines GHG Amendments

The CEQA Guidelines GHG Amendments adopted pursuant to SB 97 state in Section 15064.4(a) that lead agencies should “make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions. Section 15064.4(a) notes that an agency may identify emissions by either selecting a “model or methodology” to quantify the emissions or by relying on “qualitative analysis or other performance-based standards” (CNRA 2009c). Section 15064.4(b) provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment:

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (CNRA 2009c).

In addition, Section 15064.7(c) of the CEQA Amendments specifies that “[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence” (CNRA 2009c). Similarly, the revision to Appendix G, Environmental Checklist Form, which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds. Rather, Appendix G asks whether the project would conflict with a plan, policy or regulation adopted to reduce GHG emissions; or generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency.

Accordingly, the CEQA Amendments do not prescribe specific methodologies for performing an assessment of GHG impacts, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency's discretion to determine the appropriate thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009c).

The CEQA Amendments indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to a project, these potential mitigation measures, set forth in Section 15126.4(c), may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project's emissions; and (4) carbon sequestration measures (CNRA 2009c).

Among other things, the CRNA noted in its Public Notice for these changes that impacts of GHG emissions should focus on the cumulative impact on climate change. The Public Notice states: (CNRA 2009d)

While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CRNA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable.

Thus, the CEQA Amendments continue to make clear that the significance of GHG emissions is most appropriately considered on a cumulative level.

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The 2016 Building Energy Efficiency Standards are 25 percent more efficient than previous standards for residential construction and 30 percent better for nonresidential construction. The standards offer builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption.

Title 24 Green Building Standards

The 2016 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory and voluntary requirements for new residential and nonresidential buildings (including buildings for retail uses, office uses, public schools, and hospitals) throughout California (CBSC 2017). Development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduces energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions.

Beyond the mandatory standards, the CALGreen Code specifies voluntary measures for energy and water efficiency, material conservation, and other design features. The levels of participation are classified as Tier 1 and Tier 2. An example of Tier 1 requirements is 15 percent less energy use in residential construction than required by existing regulations. Tier 2 requires 30 percent less energy use in residential construction.

Regional

South Coast Air Quality Management District Policies

CEQA Guidelines and Proposed GHG Thresholds

The South Coast Air Quality Management District (SCAQMD) is principally responsible for comprehensive air pollution control for Orange County, and the urbanized portions of Los Angeles, Riverside and San Bernardino Counties, including the Project site. SCAQMD works directly with SCAG, County transportation commissions, and local governments and cooperates actively with all federal and State government agencies to regulate air quality.

In April 2008, SCAQMD convened a Working Group to develop GHG significance thresholds. On December 5, 2008, the SCAQMD Governing Board (Board) adopted its staff proposal for an interim CEQA GHG significance threshold for projects where the SCAQMD is the lead agency. As to all other projects, where the SCAQMD is not the lead agency, the Board has, to date, only adopted an interim threshold of 10,000 MTCO₂e per year for industrial stationary source projects (SCAQMD 2008).

For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions; Tier 2 is consistency with a GHG reduction plan; Tier 3 is a screening value or bright line; Tier 4 is a performance-based standard; and Tier 5 is GHG mitigation offsets (SCAQMD 2008). According to the presentation given at the September 28, 2010 Working Group meeting, SCAQMD staff proposed a Tier 3 draft threshold of 1,400 to 3,500 MTCO₂e/year depending on if the project was commercial, mixed use or residential. For the Tier 4 draft threshold SCAQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a percent emission reduction target; instead it referenced the San Joaquin Valley Air Pollution Control District (SJVAPCD) approach. The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. The second Tier 4 option is to utilize an efficiency target. The targets for 2020 are 4.8 MTCO₂e per year per service population (SP) for project level thresholds where the SP comprises project residents plus employees, and 6.6 MTCO₂e per year per SP for a programmatic or plan level threshold (SCAQMD 2010). The targets for 2035 are 3.0 MTCO₂e per year per SP for project level thresholds and 4.1 MTCO₂e per year per SP for a plan level threshold.

Local

West Covina General Plan

The “Our Well Planned Community” Section of the City’s General Plan (PlanWC), sub-section Land Use, contains the following policy and action related to greenhouse gas emissions:

Policy 3.6 Reduce West Covina’s production of greenhouse gas emissions and contribution to climate change, and adapt to the effects of climate change.

Action 3.6 Key land use adaptation strategies to reduce greenhouse gas emissions are:

- Promoting transit-oriented infill development, and
- Providing incentives for high-performance buildings and infrastructure.

Energy Action Plan

The City of West Covina does not currently have a climate action plan; however, the City has published an Energy Action Plan (EAP). Therefore, the Project is evaluated against the City's EAP. The purpose of the EAP is to "guide the City of West Covina toward attainable conservation goals that may also significantly reduce the impact of greenhouse gas emissions within the community" (City of West Covina 2011). The goals of the City's EAP include: educating the public about energy-saving techniques and programs; promoting and creating energy conservation opportunities and programs; installing environmentally benign, renewable, and reliable energy facilities; participating in alliances with local businesses and with other agencies; pursuing and performing local and higher funding opportunities; and coordinating other City policies, programs, and ordinances to become compatible with Sustainable Community goals. More specifically, the City has identified the following policy goals to reduce energy consumption and promote energy efficiency throughout the City:

- a. Surpass the energy efficiency standards of the California Building Code for proposed and existing municipal buildings and facilities.
- b. Provide on-line (Internet accessible) guidance and assistance to Homeowners and Builders to make compliance with new Title 24 energy requirements as effective and efficient as possible.
- c. Coordinate City Efficiency goals and programs with the efficiency projects and incentive programs of higher jurisdictional agencies. Expand the City's Residential Solar Power permit-waiver program to include other alternative energy applications. Consider fee adjustments or rebates to local businesses and residents in support of those efforts.
- d. Modify the City's lighting standards to encourage the application of "Dark Skies" goals (discourage excessive and spill-over lighting).
- e. Develop an ordinance to encourage energy efficiency upgrades and improvements in existing buildings. Empower the real estate community and other stakeholders to participate in current financial incentives and energy-retrofit opportunities prior to sale.
- f. Promote energy and water conservation design features in all major renovation and development projects.
- g. Encourage pool covers and solar pool heating systems in place of conventional methods for heating residential swimming pools.
- h. Encourage the efficient use of water and reduce urban runoff through the use of natural drainage, drought tolerant landscaping, and efficient irrigation systems in major renovation and new development projects. Recommend the incorporation of these practices within the approval processes of other local and regional departments and jurisdictions.
- i. Promote the coordination of landscapers and residential Solar Power contractors to minimize heat buildup at existing and new homes through more effective shading design.
- j. Continue the planned expansion of the City's vehicle fleet with less polluting hybrid vehicles that are more energy efficient.

- k. Continue to replace the City's existing diesel fuel burning Rapid Transit bus fleet with less polluting natural-gas fueled vehicles.
- l. Explore and implement other energy conservation programs and measures that may prove beneficial to West Covina's economy and environment.

West Covina Municipal Code

Article II, Building Code, Section 7-16, Adopted, requires consistency of the local building codes with the State Green Building Code.

4.6.2 METHODS

Relevant elements of the proposed Project related to the analysis of potential GHG emissions impacts include (1) demolition of on-site buildings, which would require export of demolition and construction debris; (2) on-site grading activities; (3) construction of hospital uses, medical office buildings, and parking structures; (4) the vehicle trips generated by the proposed Project; and (5) energy use by Project occupants. Psomas will first estimate potential GHG emissions from the Project for both construction and operational activities using the latest California Emissions Model (CalEEMod 2016.3.2.) computer program issued and maintained by the SCAQMD. Construction-related emissions would be amortized over 30 years, and the average annual GHG emissions would be added to estimated operational emissions, consistent with current SCAQMD methodologies and their NOP comment letter guidance. The estimated construction and operational emissions would then be compared to the SCAQMD's SP efficiency thresholds to determine if the Project would emit a significant amount of GHGs over either the short-term or long-term. If either estimated emission is significant, Psomas will identify appropriate measures to help mitigate GHG emissions to the greatest degree practical or feasible.

4.6.3 EXISTING SETTING

The earth's natural warming process is known as the "greenhouse effect." Certain atmospheric gases act as an insulating blanket for solar energy to keep the global average temperature in a suitable range. These gases are called "greenhouse gases" because they trap heat like the glass walls of a greenhouse. The greenhouse effect raises the temperature of the earth's surface by about sixty degrees Fahrenheit. With the natural greenhouse effect, the average temperature of the earth is about 45 degrees Fahrenheit; without it, the earth would be about minus 15 degrees. It is normal for the earth's temperature to fluctuate over extended periods of time. Over the past one hundred years; however, the earth's average global temperature has generally increased by one degree Fahrenheit. In some regions of the world, the increase has been as much as four degrees Fahrenheit.

Scientists studying the particularly rapid rise in global temperatures during the late twentieth century believe that natural variability alone does not account for that rise. Rather, human activity spawned by the industrial revolution has resulted in increased emissions of carbon dioxide and other forms of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste. The most common GHG is carbon dioxide (CO₂), which constitutes approximately 85 percent of all GHG emissions in California (CARB 2014). Worldwide, the State of California ranks as the 12th to 16th largest emitter of CO₂ and is responsible for approximately two percent of the world's CO₂ emissions. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect. While the increase in

temperature is known as “global warming,” the resulting change in weather patterns is known as “global climate change.” Global climate change is evidenced in changes to wind patterns, storms, precipitation, and air temperature.

Global climate change is by definition a global issue and California's efforts to reduce GHG emissions will not alone change the impact of global climate change. Global concentrations of GHG rather than locational GHG emissions result in adverse climate change impacts that differentially occur throughout the world, and specific scientific metrics and methodologies to measure the climate change consequences (if any) of locally-specific impacts remain subject to considerable scientific uncertainty (RSS 2018). For example, California emits only a small fraction of global GHG. The whole of the California economy's GHG emissions have dropped from approximately 1.35 percent of global GHG emissions in 1990 to 0.98 percent in 2011 (WRI 2018). As Governor Brown recently noted about California's GHG reduction efforts, “we can do things in California, but if others don't follow, it will be futile” (WRI 2018). Thus, reducing California's GHG emissions (even as the 8th largest economy in the world) cannot meaningfully impact the quantity of GHGs in the global atmosphere. To date, the vast majority of other states and nations have not followed California's lead in mandating GHG emission reductions across a broad spectrum of economic sectors under laws and regulations discussed in greater detail below and have not enacted regulations similar to those adopted in California. California already has nearly the lowest level of GHG per capita of any state. Project-level emissions for activities that occur as a result of population-based variables (people needing housing, jobs and services) that occur in California reduces global GHG emissions by facilitating more growth and development in California relative to other states. The regulatory setting for global climate change and the effects of GHG emissions pose difficult questions for lead agencies under the CEQA. The CNRA adopted revised CEQA Guidelines (Title 14 of the California Code of Regulations [CCR] Sections 15000 et seq.) on December 30, 2009, including two Appendix G checklist items for GHG emissions, proposed by the OPR (the CEQA Amendments). While these revisions add GHG as a topic that must be analyzed, they do not provide specific direction or prescribe significance criteria for determining either project-level or cumulative impacts. Instead, the revised Section 15064.4(a) instructs lead agencies to “make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions (CNRA 2009c) under two questions set forth in Appendix G:

- a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

In its Final Statement of Reasons for Regulatory Action accompanying the CEQA Amendments (FSOR), the CNRA explains that quantification of GHG emissions “is reasonably necessary to ensure an adequate analysis of GHG emissions using available data and tools” and that “quantification will, in many cases, assist in the determination of significance” (CNRA 2009a). The CNRA also notes; however, that revised Section 15064.4 reserves for lead agencies the discretion to determine the precise methodology to use for quantifying GHG emissions, and also leaves to the lead agency the responsibility of selecting any quantitative CEQA significance criteria (CNRA 2009a). This Program EIR section discusses various methodologies and significance criteria, and provides substantial evidence supporting the City's analysis of the proposed Project's GHG emissions.

Since adoption of the CEQA Amendments in 2009, only two air districts agencies have developed specific quantitative significance criteria for GHG emissions. Moreover, there are various and competing governmental and non-governmental agency guidance documents on the topic and a

variety of trial court cases. Three published cases, *CREED v. City of Chula Vista (CREED)*, *Friends of Oroville v. City of Oroville (Oroville)*, and *N. Coast Rivers Alliance v. Marin Mun. Water Dist. Bd. of Directors (2013) (N. Coast)* defer to a lead agency's discretion to consider whether GHG reductions are significant under the California Global Warming Solutions Act of 2006 (AB 32). Thus, as discussed below, the City selected consistency with AB 32 as a significance criterion for evaluating the Project's GHG impacts and quantified and calculated the Project's GHG emissions and compared them to the reductions called for under AB 32. The City also selected the SCAQMD project-level efficiency measure as a quantitative significance criterion for evaluating the Project's GHG impacts.

As for an applicable plan adopted for the purpose of reducing the emissions of greenhouse gases, the Sustainable Communities and Climate Protection Act of 2008, Senate Bill 375 (SB 375), established a process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 required the SCAG to incorporate a SCS into its RTPs that will achieve GHG emission reduction targets through several measures, including land use decisions relevant in the City's determination of approving the Project. The City compares the proposed Project to the RTP/SCS as an applicable plan to reduce GHG emissions.

4.6.4 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to GHG emissions if it will:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

In assessing these two thresholds, the CEQA Guidelines direct that agencies are to use “careful judgment” and “make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” the Project's GHG emissions (14 CCR Section 15064.4 (a)). In its Final Statement of Reasons (FSOR) for Regulatory Action accompanying the CEQA Amendments, the CNRA explains that quantification of GHG emissions “is reasonably necessary to ensure an adequate analysis of GHG emissions using available data and tools” and that “quantification will, in many cases, assist in the determination of significance” (CNRA 2009a). However, as explained in the FSOR, the revised Section 15064.4 assigns lead agencies with the discretion to determine the methodology to quantify GHG emissions. The FSOR also notes that CEQA case law has long stated that “there is no iron-clad definition of ‘significance.’ Accordingly, lead agencies must use their best efforts to investigate and disclose all that they reasonably can regarding a Project's potential adverse impacts” (*Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland, et al. [Berkeley Jets]*).

The CEQA Amendments do not prescribe specific methodologies for performing a GHG assessment, do not establish specific significance thresholds, and do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency's discretion to determine the appropriate methodologies and significance criteria consistent with the manner in which other impact areas are handled in CEQA. CEQA cases have upheld local agencies' discretion to determine the significance of GHG emissions (*CREED*; *Oroville*; *N. Coast*).

As with all determinations made in preparing an EIR, pursuant to State CEQA Guidelines Section 15064.7(b), even without the express discretion as is the case for GHG, the substantial

evidence standard applies to an agency's determination of the significance of an impact.¹ Under Section 15384, substantial evidence is defined as “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” Under the substantial evidence standard, even if there is other information that supports a contrary conclusion, or a disagreement among experts as to the methodology or significance criteria, so long as the agency decision is supported by substantial evidence, it will be upheld even if there is other substantial evidence or expert opinions to the contrary.² As such, an agency determination of significance is upheld so long as it is based on substantial evidence.

Determining how to analyze the significance of a project's climate change impacts poses a difficulty for lead agencies. The science in this area is evolving constantly. At the same time, local agencies do not specialize in this area, and there are currently no local, regional, or statewide significance criteria for determining whether a mixed-use residential development within the City of West Covina has a “significant” impact on climate change. The CNRA has adopted the CEQA Amendments developed by OPR pursuant to SB 97, as discussed above. The CEQA Amendments pose two questions that agencies should evaluate, they leave considerable discretion to lead agencies to develop appropriate methodologies and significance criteria in evaluating these questions. As such, the City's analysis of GHG significance is a good faith effort to consider all potential significance criteria under the current state of the guidance, policy, and regulation.

In developing methods for GHG impact analysis, quantitative thresholds, often referred to as screening levels, have been suggested to define an emissions level below which it may be presumed that climate change impacts would be less than significant. Neither the SCAQMD, the City of West Covina, nor the County of Los Angeles has adopted a significance threshold for the GHG emissions from non-industrial development projects. Consequently, pursuant to the discretion afforded by Sections 15064.4(a) and 15064.4(b) of the CEQA Guidelines, the impact of the Project's GHG emissions would be assessed based on the methodologies proposed by SCAQMD's GHG CEQA Significance Threshold Working Group.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for a tiered threshold approach wherein Tier 1 determines if a project qualifies for an applicable CEQA exemption; Tier 2 determines consistency with GHG reduction plans; and Tier 3 proposes a numerical screening value as a threshold. At their September 28, 2010 meeting, the Working Group suggested a Tier 3 threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year for all land use types.

Tier 4 determines if the project meets performance standards. Tier 4 has three options: Option 1—percent emission reduction target; option 2—early implementation of applicable measures, and option 3—sector-based standard. Tier 5 determines mitigation for CEQA offsets.

In the absence of adopted thresholds, the Tier 3 threshold (3,000 MTCO₂e) and Tier 4 thresholds are to be used for this analysis (SCAQMD 2008). It is noted that the use of the Tier 3 threshold was selected for the proposed Project because it is located in the South Coast Air Basin (SCAB), and these thresholds are based on the best available information and data at the time of

¹ Pursuant to 14 C.C.R. Section 15064.7(b); Eureka Citizens for Responsible Government v. City of Eureka (2007) 147 Cal.App.4th 357, 375 (lead agency has discretion to formulate significance standards)(Eureka); Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477, 493 (Mira Mar)..

² Pursuant to Laurel Heights Improvement Association v. Regents of University of California (1988) 47 Cal.3d 376, 407 (“a court's proper role in reviewing a challenged EIR is not to determine whether the EIR's ultimate conclusions are correct but only whether they are supported by substantial evidence and whether the EIR is sufficient as an informational document”).

preparation of this document. The development of project-level thresholds in accordance with CEQA is an ongoing effort at the State, regional, and County levels; and significance thresholds may differ for future projects based on new or additional data and information that may be available at that time for consideration. Additionally, the Tier 4, option 3 standard is used for this analysis. The option 3 analysis proposes efficiency targets for 2020 and 2035. The project-level threshold for 2020 targets is 4.8 metric tons per year of carbon dioxide equivalent (MTCO₂e/year), and 3.0 MTCO₂e/year for the 2035 target. The 2020 Project level efficiency target was established by SCAQMD based on the AB 32-generated projections for land use sectors. SCAQMD utilized the projected 1990 Land Use Sectors GHG Emissions target of 295,530,000 MTCO₂e to determine the appropriate efficiency targets. The (SP) used for the project-level threshold also uses the projected employment for just land use sources instead of the total statewide employment used in the business as usual (BAU) analysis.

4.6.5 ENVIRONMENTAL IMPACTS

Threshold 6.1	Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
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The following analysis is based on the “tiered thresholds” methodology established by the SCAQMD described above. Based on the proposed construction activities described in Section 3.0, *Project Description*, the principal source of construction GHG emissions would be internal combustion engines of construction equipment, on-road construction vehicles, and workers’ commuting vehicles. GHG emissions from construction activities were obtained from the CalEEMod model, described above. The estimated construction GHG emissions for the Project would be 8,707 MTCO₂e, as shown in Table 4.6-1.

Operational GHG emissions would come primarily from vehicle trips; other sources include electricity and water consumption, natural gas for space and water heating, and gasoline-powered landscaping and maintenance equipment. Estimated operational GHG emissions from full buildout of the Project are shown in Table 4.6-2. These emissions do not include the application of mitigation measures.

**TABLE 4.6-1
ESTIMATED GREENHOUSE GAS
EMISSIONS FROM CONSTRUCTION**

Source	Emissions (MTCO ₂ e)
2019	65
2020	1,563
2021	1,682
2022	1,884
2023	809
2024	806
2025	793
2026	408
2028	620
2029	77
Total Construction Emissions	8,707
Source: Table 11, Psomas Air Quality and GHG Analysis, December 2018. MTCO ₂ e: metric tons of carbon dioxide equivalent Notes: <ul style="list-style-type: none"> Totals may not add due to rounding variances. Detailed calculations in Appendix C of this Program EIR, Attachment A. 	

**TABLE 4.6-2
ESTIMATED UNMITIGATED ANNUAL GREENHOUSE
GAS EMISSIONS FROM PROJECT OPERATION**

Source	Emissions (MTCO ₂ e/year)
Area	<1
Energy	4,956
Mobile	5,134
Stationary	18
Waste	2,661
Water	381
Total Operational Emissions	13,151
Source: Table 12, Psomas Air Quality and GHG Analysis, December 2018 MTCO ₂ e/yr: metric tons of carbon dioxide equivalent per year Notes: <ul style="list-style-type: none"> Totals may not add due to rounding variances. Detailed calculations in Appendix C of this Program EIR, Attachment A. 	

Because impacts from construction activities occur over a relatively short period of time, they contribute a relatively small portion of the overall lifetime Project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). Therefore, construction and operational emissions are combined by amortizing the construction and operations over an assumed 30-year project

lifetime. This combination is shown in Table 4.6-3 using the Project emissions and is compared to the SCAQMD's draft Tier 3 threshold as previously discussed. The Tier 3 threshold was developed to identify projects that would have a considerable amount of GHG emissions. This threshold identifies projects that exceed a certain magnitude of emissions and does not provide any information as to whether projects are considered to be "green" or meet efficiency standards relative to GHG emissions. The Tier 4 thresholds were developed to determine whether a project is considered to be "green" or efficient relative to GHG emissions per SP.

**TABLE 4.6-3
ESTIMATED TOTAL PROJECT ANNUAL
GREENHOUSE GAS EMISSIONS**

Source	Emissions (MTCO ₂ e/year)
Construction Amortized	290 ^a
Operations (Table 14)	13,151
Total ^b	13,441
SCAQMD Tier 3 Threshold	3,000
Exceeds Tier 3 Threshold?	Yes
Source: Table 13, Psomas Air Quality and GHG Study, December 2018. MTCO ₂ e/yr: metric tons of carbon dioxide equivalent per year; year. ^a Total derived by dividing construction emissions (see Table 12) by 30. ^b Total annual emissions is the sum of amortized construction emissions and operational emissions.	

As shown in Table 4.6-3, the Project would exceed the SCAQMD's Tier 3 thresholds which would then trigger the use of the Tier 4 threshold. Table 4.6-4 provides an evaluation of the Project's emissions against the Tier 4 efficiency threshold. As shown in Table 4.6-4, the Project would exceed the efficiency threshold (i.e., be significant) and would require mitigation such as the installation of photovoltaic solar panels on new building roofs or parking structures. Due to the type of uses proposed (i.e., hospital service expansion) there are few mitigation measures available to reduce Project-related operational GHG emissions.

**TABLE 4.6-4
TOTAL UNMITIGATED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS
EVALUATED AGAINST THE TIER 4 THRESHOLD**

Source	Emissions (MTCO ₂ e/year)
Total Project GHG Emissions (MTCO ₂ e/year) ^a	13,441
Service Person Population	1,096
Project GHG Efficiency (MTCO ₂ e/SP/year)	12.3
SCAQMD Tier 4 Threshold for 2035 (MTCO ₂ e/SP/year)	3.0
Exceeds Tier 4 Threshold?	Yes
Source: Table 14, Psomas Air Quality and GHG Study, December 2018. MTCO ₂ e/yr: metric tons of carbon dioxide equivalent per year; year. SP = Service Population (hospital employees, patients, and visitors) ^a Total annual emissions is the sum of amortized construction emissions and operational emissions.	

Mitigation Measures

GHG-1 Prior to completion of all new Project-related buildings or structures, the Hospital shall install solar photovoltaic panels that generate at least 25 percent of the additional electricity demand associated with the new Project-related structure(s). The location, size, and other design parameters of the panels shall be at the discretion of the Hospital. This measure shall be implemented to the satisfaction of the City Engineer.

The Project would comply with energy efficiency requirements established in the CalGreen Codes. Other mitigation measures such as transportation related measures were considered but rejected in light of the inability of the Project Applicant to enforce these measures as well as the considerations to the many special circumstances that would arise associated with the transport of medical patients. Table 4.6-5 provides an evaluation of the Project's mitigated emissions against the Tier 4 efficiency threshold. As shown in Table 4.6-5, the Project would still exceed the efficiency threshold even with implementation of the recommended mitigation which provides a 7 percent reduction in emissions over the unmitigated condition. It should be noted that, due to the type and size of the proposed Project, there are no other feasible mitigation measures available to substantially reduce future GHG emissions from the proposed hospital expansion Project.

**TABLE 4.6-5
TOTAL MITIGATED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS
EVALUATED AGAINST THE TIER 4 THRESHOLD**

Source	Emissions (MTCO₂e/year)
Total Project GHG Emissions (MTCO ₂ e/year) ^a	12,496 (-7%)
Service Person Population	1,096
Project GHG Efficiency (MTCO ₂ e/SP/year)	11.4
SCAQMD Tier 4 Threshold for 2035 (MTCO ₂ e/SP/year)	3.0
Exceeds Tier 4 Threshold?	Yes
Source: Table 15, Psomas Air Quality and GHG Study, December 2018. MTCO ₂ e/yr: metric tons of carbon dioxide equivalent per year; year. ^a Total annual emissions is the sum of amortized construction emissions and operational emissions.	

Summary of Impact. Even with implementation of Mitigation Measure GHG-1 (25 percent renewable energy), Project-related GHG emissions would exceed the SCAQMD's Tier 4 thresholds. Therefore, the Project would result in an unavoidable significant impact related to GHG emissions.

Threshold 6.2	Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
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As discussed previously, the City of West Covina has adopted standards for the purpose of reducing energy consumption, which would result in a reduction in GHG emissions. The State policy and standards adopted for the purpose of reducing GHG emissions that are applicable to the proposed Project are EO S-3-05, AB 32, the California Global Warming Solutions Act of 2006,

and SB 32. The quantitative goal of these regulations is to reduce GHG emissions to 1990 levels by 2020 to 80 percent below 1990 levels by 2050, and for SB 32, to 40 percent below 1990 levels by 2030. Statewide plans and regulations (such as GHG emissions standards for vehicles, the Low Carbon Fuel Standard, Cap-and-Trade, and renewable energy) are being implemented at the statewide level, and compliance at a project level is not addressed.

As stated above, the City adopted the Energy Action Plan to identify the City's long-term strategies and commitment to achieve energy efficiency in the community and in City operations. However, the EAP does not include requirements or standards for implementation of energy reduction to development projects. Table 4.6-6 below shows the applicable EAP policies applicable to the Project and the Project's consistency with these policies.

**TABLE 4.6-6
ENERGY ACTION PLAN CONSISTENCY**

Energy Action Plan Policy	Project Consistency Analysis
Provide on-line (Internet accessible) guidance and assistance to Homeowners and Builders to make compliance with new Title 24 energy requirements as effective and efficient as possible.	Consistent. The Project site would be equipped with internet accessibility, which would provide builders with the ability to effectively and efficiently meet Title 24 energy requirements.
Modify the City's lighting standards to encourage the application of "Dark Skies" goals (discourage excessive and spill-over lighting).	Consistent. The Project would comply with the City's Lighting ordinance (Section 26-570) for non-residential buildings.
Promote energy and water conservation design features in all major renovation and development projects.	Consistent. The Project is designed to meet current Title 24 Standards at the time of Building Permit Review.
Encourage the efficient use of water and reduce urban runoff through the use of natural drainage, drought tolerant landscaping, and efficient irrigation systems in major renovation and new development projects. Recommend the incorporation of these practices within the approval processes of other local and regional departments and jurisdictions.	Consistent. The Project would meet current California Green Building Standards Code (CALGreen Code) for indoor water use.
Source: City of West Covina 2011. Table 16, Psomas Air Quality and GHG Analysis, December 2018.	

As shown in Table 4.6-6, the Project is consistent with applicable EAP policies. The proposed Project would be built to meet the current applicable Title 24 Energy Efficiency Standards for Nonresidential Buildings (*California Code of Regulations* [CCR], Title 24, Part 6) and the applicable CALGreen Code (24 CCR 11). The proposed Project would be developed in compliance with the requirements of these regulations.

The proposed Project is an update to an existing medical use project. Public transit availability would reduce vehicle trips and associated GHG emissions when compared with locations without similar transit attributes. Additionally, the Project would provide bicycle parking and storage areas to encourage reduction of fossil-fueled vehicle use by employees and the associated GHG emissions, and it would provide new facilities for charging of electric vehicles and parking for low-emission vehicles. It would be required to meet the State's high standards for institutional hospital buildings as well as the State's Green Building Code.

The Project would generate GHG emissions, either directly or indirectly, that would exceed the Tier 3 and Tier 4 interim thresholds and would potentially have a significant impact on the environment related to the magnitude and GHG efficiency thresholds. These exceedances are primarily the result of the size of the Project and the associated transportation-related emissions

which cannot be feasibly reduced as the Project has little or no control over how patients and visitors, which are the majority of Project-related trips, come to or go from the Hospital.

Summary of Impact. As shown in Table 4.6-6, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, due to the exceedances of the SCAQMD's significance Tier 3 and Tier 4 thresholds, even with the implementation of Mitigation Measure GHG-1, this impact would be significant and unavoidable.

4.6.6 CUMULATIVE IMPACTS

Under the most recent CEQA Guidelines Amendments, impacts related to GHG emissions are considered cumulative rather than project specific due to their global nature. Therefore, the preceding analyses of Project-related GHG impacts (i.e., Thresholds 6.1 and 6.2) are cumulative in nature, and no additional analysis in this regard is required.

4.6.7 IMPACTS OF MITIGATION MEASURES

Installation of solar photovoltaic panels on new Project-related buildings or structures would not result in any significant impacts related to GHG emissions, although they might incrementally slow completion of construction of buildings with solar panels installed.

4.6.8 SUMMARY OF IMPACTS AFTER MITIGATION

Even with implementation of Mitigation Measure GHG-1, Project-related impacts related to GHG emissions would remain significant and unavoidable.

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4.7 HAZARDS AND HAZARDOUS MATERIALS

This section analyzes the potential impacts of existing hazards that may adversely affect the Project and hazards and hazardous materials (hazmat) that may be introduced by the proposed Queen of the Valley Hospital (QVH or Hospital) expansion. Information presented in this section is derived from compiled hazmat databases maintained by several state agencies and other referenced documents.

Comment letters submitted on the Notice of Preparation (NOP) raised issues related to hazards (Airport Land Use Commission – possible air ambulance service), and characterization of, and if necessary, remediation of hazardous materials (Department of Toxic Substances Control).

4.7.1 RELEVANT POLICIES AND REGULATIONS

Federal

Federal Aviation Regulation Part 77

Part 77 of the Federal Aviation Regulations (FAR, Title 14 of the *Code of Federal Regulations*) addresses objects affecting navigable airspace. This regulation requires that the Federal Aviation Administration (FAA) be notified of any project that may encroach upon established navigable airspace or that creates a use that requires navigable airspace such as air ambulances (i.e., helicopters).

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act administered by the U.S. Department of Transportation governs the transport of hazardous materials. The California Department of Transportation (Caltrans) implements the federal regulations published as Title 49 of the *Code of Federal Regulations* (CFR), which is also known as the Hazardous Materials Transportation Act. The main purpose of the Hazardous Materials Transportation Act is to provide adequate protection against risks to life and property inherent in the transport of hazardous materials by improving the regulatory and enforcement authority of the Secretary of Transportation.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was authorized by Congress in 1976. This law creates the framework for the proper management of hazardous and non-hazardous solid waste. The RCRA amended the Solid Waste Disposal Act of 1965 and has the following goals: (1) to protect human health and the environment from the potential hazards of waste disposal; (2) to conserve energy and natural resources; (3) to reduce the amount of waste generated; and (4) to ensure that wastes are managed in an environmentally sound manner.

Code of Federal Regulations, Title 42, Public Health

These regulations govern the operation of hospitals including staffing, facilities, and procedures, which address hazardous materials, as appropriate, under normal usage, although emergency conditions dealing with accidental release of hazardous materials are not addressed.

State

California Hazardous Waste Control Act

The California Hazardous Waste Control Act (HWCA), as found in the *California Health and Safety Code* (see Division 20, Chapter 6.5, Article 2, Section 25100, et seq.) authorizes the California State Department of Toxic Substances Control (DTSC) and local Certified Unified Program Agencies (CUPA) to regulate facilities that generate or treat hazardous waste. The HWCA authorizes CUPAs to perform the following actions:

- Conduct inspections of any factory, plant, construction site, waste disposal site, transfer station, establishment, or any other place or environment where hazardous wastes are stored, handled, processed, disposed of, or being treated to recover resources.
- Maintain records of compliance with the Hazardous Waste Control Act.
- Require hazardous waste generators as provided herein, to pay inspection and administration fees to cover the costs of administering the provisions in this Act. Fees may include but shall not be limited to the costs of inspection, document development and processing, recordkeeping, enforcement activities, and informational materials development and distribution.
- Issue authorization for on-site treatment of hazardous waste to persons eligible to operate pursuant to permit-by-rule, conditional authorization, or conditional exemption.
- Enforce against violations of the HWCA.

Certified Unified Program Agency

In 1993, Senate Bill (SB) 1082 created the CUPA program to foster effective partnerships between local, State, and federal agencies. The CUPA for the City of West Covina is the Los Angeles County Fire Department. The CUPA program consolidated the administrative, permits, inspections, and enforcement activities of the following environmental and emergency management programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- California Accidental Release Prevention Program
- Underground Storage Program
- Aboveground Petroleum Storage Act Program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs
- California Fire Code – Hazardous Material Management Plans and Hazardous Material Inventory Statements

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP), managed by the CUPA as noted above, is a merging of the Federal Accidental Release Prevention Program and State programs for the prevention of accidental release of regulated toxic and flammable substances. It replaced the California Risk Management and Prevention Program and was created to eliminate the need for two separate and distinct risk management programs. Stationary sources exceeding a threshold quantity of regulated substances are evaluated under this program to determine the

potential for and impacts of accidental releases from the source. Depending on the potential hazards, the owner or occupant of a stationary source may be required to develop and submit a risk management plan.

Office of Statewide Planning and Development

Statutory authorization for the Office of Statewide Planning and Development (OSPD) and its programs is primarily found in Division 107 of the California Health and Safety Code (HSC) Section 127000 et seq. HSC Division 107 is divided into parts that roughly correlate to the Divisions within OSPD. The Queen of the Valley Hospital staff are working with the Facilities Development Division on their expansion project, which is covered by Part 7 Section 129675.

State Regulations Governing Hospital Operation

There are a variety of State regulations that govern the daily regular operation and certification of hospital facilities, including: (a) California Code of Regulations (CCR), Title 22, Division 5, Licensing and Certification of Health Care Facilities; (b) California Health and Safety Code, Chapter 2, Health Facilities, 1250-1339.59; and (c) California Welfare and Institutions Code. Various sections of these regulations address hazardous materials under normal usage, although emergency conditions dealing with accidental release of hazardous materials are not addressed in much detail.

California Code of Regulations Title 21

The California Department of Transportation (Caltrans), Division of Aeronautics, administers CCR Title 21 Sections 3525 through 3560 regarding Airports and Heliports. They also provide guidance to local users that propose new heliport or helipad facilities, consistent with applicable federal and state laws.

Los Angeles County – Airport Land Use Commission

The Los Angeles County-Airport Land Use Commission (LAC-ALUC) indicates that the process for reviewing a helipad outside of an Airport Influence Area (AIA) will be different from reviewing one inside of an AIA or in an unincorporated area, since airport operations will not be a factor in terms of analyzing the impacts, and the Airport Land Use Plan actually does not specifically address heliports. Their policy is that such will be processed administratively as Minor Aviation cases, and in an advisory capacity. Emergency-related heliports are usually given the highest consideration (over commercial types), and their policy is to ensure that it does not generate significant noise impacts on surrounding residential properties, and that it is not located in proximity to an existing heliport or a nearby airport (the latter being not applicable to this case). County ALUC staff (Stewart 2018) indicated the following factors and criteria would be considered by the ALUC in its review of proposed new helicopter landing facilities.

1. Intended Use and Purpose: Proposed new helicopter landing facilities to be used in conjunction with emergency medical, police, fire or other public health and safety services will be accorded first priority consideration
2. Location, Elevation and Design: The design of the proposed facility should comply with standards established by the FAA and set forth in Advisory Circular No. 150/539-18 (Heliport Design Guide). In urbanized settings, rooftop landing facilities are generally preferable to ground level pads due to the increased separation between ground activities and conflicting aircraft operations.

3. Approach and Departure Routes: Overflight of noise sensitive land uses should be avoided. The availability of alternative emergency landing sites along designated approach and departure paths will be assessed.
4. Noise Impact Assessment: The following factors will be considered in the assessment of potential noise impacts.
 - Size and type of aircraft to use the proposed facility.
 - Acoustical propagation characteristics associated with operations at the proposed facility.
 - Anticipated number end hours of operations.
 - Location end height of surrounding buildings, walls and other noise attenuating features.
 - Prevailing local wind patterns
 - Proximity of residential areas, schools and other noise sensitive use.
5. Noise Standard: The noise impact erase is defined as that area exposed to a SENEL of 70 dB or greeter as a result of helicopter operations at the proposed facility. Exposure of residential and other sensitive uses to such noise impacts should be avoided, particularly during noise sensitive hours.
6. Pedestrian and Automotive Thoroughfares: Low level overflight of pedestrian and automotive thoroughfares should be avoided.
7. Special Land Use Considerations: The proximity of land uses involving special compatibility and/or safety issues, such as places of public assembly, storage facilities for volatile or dangerous materials, and manufacturing or communication facilities particularly sensitive to noise and vibration will be assessed. Low level overflight of such uses should be avoided.
8. Proximity to Other Helicopter Landing Facilities: The proximity of the proposed landing facility to other active helicopter facilities will be assessed. Non-emergency medical/public safety related private landing facilities will be discouraged within 2 miles of an established public use helistop or heliport.

Local

West Covina General Plan

The City's General Plan (PlanWC) does not specifically address airport land use or safety concerns as the City is not within the influence area of any local airports. However, PlanWC clearly indicates it is the City's responsibility to protect its citizens, employees, homes, and businesses from public health and safety risks, which would include accidental releases of hazardous materials or the operation of helicopters (West Covina 2016).

Municipal Code

The City's Municipal Code does not contain any detailed regulations pertaining to hazardous materials other than miscellaneous restrictions (e.g., not parking trucks with hazardous materials in residential areas, near schools or bridges, etc.).

Fire Department/Hazmat Regulation

Activities and operations within the City that deal with hazardous materials are regulated by the Los Angeles County Fire Department as the CUPA supported by the County Department of Public Health as appropriate for administration of federal and state laws and regulations concerning hazardous materials. The County Fire Department's goal is to ensure that the use, handling, storage, and transportation of hazardous materials within the City complies with all applicable State laws (including but not limited to, Section 65850.2 of the *California Government Code* and Section 25505 et seq. of the *California Health and Safety Code*), and that appropriate information is reported to the County Fire Department as the local regulatory authority. For example, businesses within the City are required by State law to prepare Hazardous Materials Release Response Plans and Hazardous Materials Inventory Statements, and upon request submit copies of these plans, including any revisions, to the County Fire Department.

4.7.2 METHODS

A Phase I Environmental Site Assessment (ESA) was not prepared for the hospital site; however, Psomas conducted a search of the two main composite environmental/hazmat databases maintained by the state, Geotracker by the State Department of Water Resources (DWR 2018) and Envirostor maintained by the California Department of Toxic Substances Control (DTSC 2018a). The databases revealed four sites within one mile of the hospital site that had records involving minor releases of hazardous materials (e.g., underground storage tank leaks) but all incidents had been fully remediated and all regulatory agency cases had been closed. According to the database search, there are also no facilities or uses in the surrounding area that would represent a significant potential health or safety risk involving hazardous materials or vapor migration. In addition, hospital facilities staff (QVH 2018) indicated there had been no fires or incidents involving spills or other accidental releases of hazardous materials at the hospital.

4.7.3 EXISTING SETTING

The Project site has supported a functioning community hospital and associated uses since 1962. Daily operations and maintenance activities at the hospital involve the use of dozens of chemicals, drugs, etc. many of which are classified as hazardous materials (i.e., flammable, toxic, explosive, etc.). However, these materials are stored and handled according to various federal and state hazmat regulations, and activities at the hospital are regularly inspected by hospital regulatory agencies and the County Fire Department. Two summary state databases were consulted regarding recorded incidents involving hazardous materials on the hospital site or in the surrounding area (within a one-mile radius). The search revealed four past hazmat incidents in the area, which are summarized in Table 4.7-1. The databases revealed three historical incidents involving leaking underground storage tanks (LUSTs) but all cases were closed or eligible for closure. The fourth site is one mile from the hospital property and does not appear to involve a documented accidental release of hazardous materials. In addition, it involves a type of business (office-investments) that does not typically result in LUST events or other substantial hazmat releases.

**TABLE 4.7-1
LOCAL HAZMAT INCIDENTS**

Site/Address	Distance/Direction from Project site	Hazmat Issue	Status
GEOTRACKER DATABASE			
West Covina Unified School District 1717 Merced Avenue West	500 feet west	LUST Cleanup Site RB Case R-13750	Eligible for Closure
West Covina Maintenance Yard 825 Sunset Avenue South	720 feet northeast	LUST Cleanup Site RB Case I-12629	Completed-Case Closed
ARCO Service Station #0103 1333 Merced Avenue West	140 feet south	LUST Cleanup Site RB Case I-12040A	Completed-Case Closed
ENVIROSTOR DATABASE			
AI HOA Investments 524 S. Glendora Avenue	1.0 mile east	Site Evaluation Reference 1248	Open-No Data
LUST = leaking underground storage tank Sources: Geotracker and Envirostor databases searched November 11, 2018 (DWR 2018; DTSC 2018a) (see Appendix F).			

4.7.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact on hazards and hazardous materials if it will:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- 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?
- Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 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, result in a safety hazard or people residing or working in the project area.
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

4.7.5 ENVIRONMENTAL IMPACTS

Regulatory Requirements

Hospital operations are governed by a host of state and federal regulations some of which address the safe handling, storage, use, and disposal of hazardous materials used by the hospital. The design of future hospital facilities under the proposed Project would be subject to review and approval by the OSPD and their Facilities Development Division, which will include the design of any hazmat storage facilities.

The general use, transport, storage, and disposal of hazardous materials in California are governed by a large number of federal and state laws and regulations, which are administered and monitored by the Los Angeles County Fire Department supported by the County Department of Public Health. The City also maintains a Natural Hazards Management Plan (NHMP) to address public risks from various natural hazards, including floods and fires.

Impact Analysis

Threshold 7.1	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
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Construction activities associated with the proposed Project would involve the use of chemical substances (e.g., solvents, paints, fuel for equipment) and other potentially hazardous materials. These materials are common with typical construction activities and do not generally pose a significant hazard to the public or the environment. Additionally, construction activities would be completed in compliance with applicable regulatory requirements, including the SWRCB National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (Construction General Permit). As required, best management practices (BMPs) identified in the Project's Storm Water Pollution Prevention Plan (SWPPP) to control potential construction-related pollutants would be implemented, as further discussed in Section 4.8, *Hydrology and Water Quality*.

Medical and maintenance activities associated with hospital operation are likely to utilize hazardous materials typical to medical institutional uses in limited quantities, such as petroleum products (including oil and gasoline), automotive fluids (antifreeze, hydraulic fluid), paint, cleaners (dry cleaning solvents, cleaning fluids), and pesticides. By-products generated as a result of activities using hazardous materials are considered hazardous waste. Contamination usually takes the form of hazardous materials or waste spills in the soil. Such contamination can penetrate soils into the groundwater table, resulting in the pollution of shallow groundwater and/or a local water supply. Institutional uses that have or have had underground storage tanks (USTs) and/or use hazardous materials in their operations, can create such contamination.

In addition to medical chemicals, drugs, etc., hospital operation would also involve the use of common materials that are technically labeled "hazardous" (e.g., commercial cleansers, chlorine and other water system maintenance chemicals, pesticides, and other landscape maintenance materials). However, the amount of materials that would be handled at any one time is relatively small and would not pose a significant hazard to the public or the environment.

Hazards to the public or environment through the transport, use, or disposal of hazardous materials are typically associated with operation of commercial or industrial uses but less so with institutional uses like hospitals due to the types of activities the institution normally performs.

However, use of all chemicals and other potentially hazardous materials in the hospital would be subject to compliance with applicable federal, State, and City regulations, standards, and guidelines related to the proper use, storage, handling, transport, and disposal of such materials.

A number of existing regulations ensure that hazardous materials/waste users, generators, and transporters provide operational safety and emergency response measures so that no significant threats to public health and safety are created. These include the Hazardous Material Transportation Act, the RCRA, the California Hazardous Waste Control Act, and the California Accidental Release Prevention Program, as previously discussed in Section 4.7.1, *Relevant Policies and Regulations*, of this Program EIR. Also, the County Fire Department monitors businesses in the City to ensure that the use, handling, storage, and transportation of hazardous materials complies with all applicable state laws and that appropriate information is reported to the County Fire Department as the local regulatory authority.

Through compliance with existing applicable hazardous materials regulations, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials. Through compliance with established hazmat regulations this impact is considered to be less than significant.

In addition, the proposed Specific Plan would allow for the future implementation of new or different types of medical and supporting uses than are provided at present, outlined in Section 3.0, *Project Description*, of Program EIR. It is not known specifically what these future uses would involve, and some could use or require the storage and handling of hazardous materials. However, any such uses would comply with all applicable regulations and safety procedures regarding hazardous materials in hospitals, so potential impacts in this regard would be less than significant.

Summary of Impact. Construction and operation of all phases of the proposed Project would involve handling of hazardous materials in limited quantities and typical to hospitals in urban environments. Through compliance with existing hazardous materials regulations applicable to the proposed Project, there would be less than significant impacts associated with the transport, use, or disposal of hazardous materials during construction or operation of the proposed Project. No mitigation is required.

Threshold 7.2	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
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Onsite Uses

As discussed above, construction and operation of the proposed Project would involve the use of hazardous materials that are typically associated with an urban environment. These materials would be transported, used, stored, and disposed of in compliance with applicable regulations and would not create a significant hazard to the public or environment through reasonably foreseeable upset or accident conditions. The use of chemicals and hazardous materials during construction would cease after completion of the planned hospital improvements.

Current and future operation of the hospital would continue to involve the use of a variety of hazardous materials; however, hospital facilities staff (Blakely 2018) indicated there had been no fires or incidents involving spills or other accidental releases of hazardous materials at the hospital.

Available information indicates the potential for accidental release of hazardous materials during grading is low, this issue is potentially significant, and mitigation is recommended. In their NOP comment letter, the DTSC recommended certain actions to adequately protect public health and safety if such materials were found.

In addition, due to the age of construction of some of the onsite hospital buildings, it is possible that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) may be present. If present, these materials would need to be remediated prior to demolition of any buildings or before substantial remodeling of any existing buildings. This is a potentially significant impact that requires mitigation.

Mitigation Measures

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

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

HAZ-2 Prior to demolition of any structures or interior remodeling of existing buildings, the hospital shall provide evidence that an assessment for asbestos-containing materials (ACMs) and lead-based paint (LBP) has been performed and any necessary abatement has been conducted in accordance with local, State, and federal guidelines. This measure shall be implemented to the satisfaction of the City Planning Department.

Offsite Uses

Four offsite uses were identified in the Geotracker and Envirostor governmental databases that involved accidental releases of hazardous materials. One of these sites is an office building one mile from the hospital, while the other three sites involve leaking underground storage tank (LUST) incidents and are within a thousand feet of the hospital property. However, these cases have been closed or are eligible for closure by the affected regulatory agency and do not constitute a significant risk to the proposed Project regarding the accidental release of hazardous materials. Due to the nature of the nearby facilities (i.e., school district office, city maintenance yard, and gasoline service station) the potential for substantial releases of hazardous materials

that would represent significant risks to public health or safety from these sites are considered negligible.

Summary of Impact. Based on the available information, the proposed Project does not have a demonstrable potential to result in the accidental release of hazardous materials that would represent a significant impact on the environment or a significant risk to public health or safety, with implementation of Mitigation Measures HAZ-1 and HAZ-2. In addition, the potential for surrounding land uses to cause a significant impact on the proposed Project relative to hazardous materials is also less than significant, and no additional mitigation is warranted.

Threshold 7.3	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?
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The West Covina Unified School District office is located 500 feet west of the hospital property, but this facility does not constitute a school site as referenced in Threshold 7.3. However, the Edgewood Middle School and Edgewood High School, both located at 1625 W. Durness Street, are 260 feet (0.05 mile) southwest of the Project site just across Merced Avenue. It is possible that students or staff at these two schools could be affected by emissions or releases at the hospital involving acutely hazardous materials if they were to occur. It should be noted that, while the hospital and school properties are relatively close, the hospital building is over a thousand feet (0.20 mile) from the closest classroom or administration building of the schools.

Hospital facilities staff have indicated they are not aware of any recent or historical incidents in the buildings or on the grounds of the hospital involving hazardous materials. However, the proximity of the Edgewood Middle and High Schools to the Project site represents a potentially significant impact. To err on the side of caution, the following measure is proposed:

Mitigation Measures

HAZ-3 Prior to the start of Project construction and at least annually thereafter during the Project construction period, the Hospital Facilities Staff shall meet with the principals of the Edgewood Middle and High Schools and the Superintendent of the West Covina Unified School District to review the planned hospital expansion and discuss health and safety issues relative to hazardous materials at the hospital. The Hospital Staff shall also share their hazmat response and disaster preparedness plans with the school and district personnel so each has an understanding of potential risks, lines of communication and responsibility, and can comment on the plans as they may affect the adjacent school facilities. This measure shall be implemented to the satisfaction of the City Planning Director.

Summary of Impact. With implementation of Mitigation Measure HAZ-3, potential impacts on local schools from construction and operation of the proposed Project would be reduced to less than significant levels.

Threshold 7.4	Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
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There are no hazmat sites in or near the Project site that are on the official “Cortese List” (DTSC 2018b) maintained by the DTSC pursuant to Government Code Section 65962.5 (Appendix F). Therefore, impacts in this regard are less than significant, and no mitigation is required.

Threshold 7.5	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or people residing or working in the project area?
Threshold 7.6	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The closest airport to the Project site is the El Monte Airport located at 4233 Santa Anita Avenue, in the City of El Monte, which is 5.1 miles northwest of the hospital property. In addition, there are no private airstrips within two miles of the Project site. Therefore, impacts in this regard are less than significant, and no mitigation is required.

Threshold 7.7	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
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The Project site is at the intersection of two major streets in the City that have been fully improved within their rights-of-way. The most distant point of the Project site (i.e., north end of the former Sunset Field property) is 1,350 feet from Sunset Avenue and 1,800 feet from Merced Avenue, and there are driveways travel routes onsite that directly access this site, so the entire Project site has relatively immediate access from both adjacent roadways. In addition, the Hospital has prepared and maintains emergency and disaster preparedness plans that are regularly coordinated with City staff since the Hospital provides critical public services on an ongoing basis and during emergencies and disasters. The Project would expand medical services available to City residents and surrounding communities. Therefore, the proposed Project would not have significant impacts related to emergency response, evacuation, or disaster plans, and no mitigation is required.

Threshold 7.8	Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
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The Project site is in a fully developed urban area surrounded by development, roads, and freeways. The Hospital in fact assists the City by providing critical medical services in the event of local urban, suburban, or wildland fires in the surrounding area. The Project would expand medical services available to City residents and surrounding communities. Therefore, the proposed Project would not have significant impacts related to wildland fires, and no mitigation is required.

4.7.6 CUMULATIVE IMPACTS

The cumulative study area associated with hazardous materials is typically site-specific except where past, present, and/or proposed land uses would impact off-site land uses and persons or where past, present, or foreseeable future development in the surrounding area would cumulatively expose a greater number of persons to hazards (e.g., hazardous materials and/or waste contamination).

As discussed under Thresholds 7.1 through 7.4, past, existing, and proposed Project uses (i.e., hospital operations and expansion) would not result in an environmental hazard related to the transport, use, or disposal of hazardous materials or the potential for accidental release of hazardous materials. The proposed Project and cumulative development would be required to comply with applicable local, State, and federal requirements concerning hazardous materials. Therefore, the proposed Project would not contribute to any potential significant cumulative hazardous materials impacts.

There are no Project impacts relative to aviation hazards (Thresholds 7.5 and 7.6), so there would be no contribution to any cumulative impacts in this regard. Similarly, the Project would not have any adverse impacts related to evacuation, emergency plans, or wildland fires (Thresholds 7.7 and 7.8), and no migration was required, so the Project would not make any significant contributions to cumulative impacts regarding these environmental conditions.

In summary, the proposed Project would not contribute to any potential significant cumulative impacts related hazards or hazardous materials.

4.7.7 IMPACTS OF MITIGATION MEASURES

Testing and possible remediation of asbestos and lead contamination required by implementation of HAZ-1 and HAZ-2 may result in temporary delays in construction but would have no significant environmental impacts assuming proper handling and disposal of any contaminated materials. Implementation of HAZ-3 would provide for better communication and coordination between the schools, the school district, the City, and the hospital regarding hazardous materials, which would not result in any significant environmental impacts.

4.7.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures HAZ-1 through HAZ-3, Project-related impacts related to hazards and hazardous materials would be less than significant.

4.7.9 REFERENCES

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4.8 **HYDROLOGY AND WATER QUALITY**

This section identifies and evaluates the proposed Project's potential to have adverse hydrology and water quality effects. Information presented in this section is primarily based on the existing and proposed drainage conditions outlined in Section 3.4, *Infrastructure Plan*, Sub-section 3.4.3, *Drainage Plan*, of the Queen of the Valley Hospital (QVH or Hospital) Specific Plan (QVHSP) (see Appendix A of this Program EIR).

There were no comments from public agencies or the general public relative to hydrology or water quality submitted during the Notice of Preparation (NOP) period or as a result of the Scoping Meeting.

4.8.1 **RELEVANT POLICIES AND REGULATIONS**

Federal

Clean Water Act and National Pollutant Discharge Elimination System

The Federal Water Pollution Control Act was promulgated in 1948 to regulate the discharge of pollutants into surface waters. In 1972, it was named the Clean Water Act (CWA) and amended to require National Pollutant Discharge Elimination System (NPDES) permits for the discharge of pollutants to “waters of the U.S.” from any point source. In 1987, the CWA was again amended to require the U.S. Environmental Protection Agency (USEPA) to establish regulations for permitting under the NPDES permit program for municipal and industrial storm water discharges. The USEPA published final regulations regarding storm water discharges on November 16, 1990. The regulations require that municipal separate storm sewer system (MS4)¹ discharges to surface waters be regulated by an NPDES permit.

In addition, the CWA requires states to adopt water quality standards for water bodies for USEPA approval. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are prescribed concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water that supports a particular use. Because California had not established a complete list of acceptable water quality criteria, the USEPA established numeric water quality criteria for certain toxic constituents in the form of the California Toxics Rule per the Code of Federal Regulations Section 131.38).

As further discussed below, water bodies that do not meet water quality standards are considered “impaired” under Section 303(d) of the CWA, and responsible Regional Water Quality Control Boards (RWQCBs) are required to develop total maximum daily loads (TMDLs)² for the impairing pollutants. Once established, the TMDL is allocated among current and future pollutant sources that discharge to the water body.

For point sources, including storm water, the load allocation is referred to as a “Wasteload Allocation”, whereas for non-point sources, the allocation is referred to simply as a “Load

¹ An MS4 is a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains) and is owned or operated by a public body that has jurisdiction over the disposal of sewage, industrial wastes, storm water, or other wastes. The MS4s are designated or used for collecting or conveying storm water only (i.e., not wastewater or combined sewage).

² A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a factor of safety).

Allocation”. Once established, the TMDL allocates the loads (or concentrations) among current and future pollutant sources to the water body.

The CWA requires that the State Water Resources Control Board (SWRCB) and RWQCBs conduct a Water Quality Assessment that addresses the condition of its surface waters (required in Section 305(b) of the CWA) and that provides a list of impaired waters (required in Section 303(d) of the CWA); this Water Quality Assessment is then submitted to the USEPA for review and approval. The Water Quality Assessment integrates the requirements of Sections 305(b) and 303(d) of the CWA and is referred to as the “Integrated Report”. The 2014/2016 California Integrated Report (Clean Water Act Section 303(d) List/305(b) Report) list was approved by the SWRCB on October 3, 2017, and the USEPA approved the Report on April 6, 2018 (SWRCB 2018).

State

California Porter-Cologne Act

California’s primary statute governing water quality and water pollution issues is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act) (Division 7 of the California Water Code). The Porter-Cologne Act grants the SWRCB and the RWQCBs broad powers to protect water quality and is the primary vehicle for implementing California’s responsibilities under the federal CWA. The Porter-Cologne Act gives the SWRCB and the RWQCBs authority and responsibility to (1) adopt plans and policies; (2) regulate discharges to surface water and groundwater; (3) regulate waste disposal sites; and (4) require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act establishes reporting requirements for unintended discharges of any hazardous substance, sewage, and oil or petroleum products. It also enables the RWQCBs to include water discharge prohibitions applicable to particular conditions, areas, or types of waste in its region.

Each RWQCB is required to formulate and adopt a water quality plan (or Basin Plan) for its region. The Basin Plans must conform to the policies set forth in the Porter-Cologne Act and those established by the SWRCB in its State Water Policy. The Basin Plan serves as the basis for each RWQCB’s regulatory programs. The Project site is located within the purview of the Santa Ana RWQCB (Region 8) and must comply with applicable elements of the region’s Santa Ana River Basin Plan (discussed below), the Porter-Cologne Water Quality Control Act, and the CWA. The RWQCBs are also authorized to (1) enforce discharge limitations; (2) take actions to prevent violations of these limitations from occurring; and (3) conduct investigations to determine the status of the quality of any of the “Waters of the State”.

The Porter-Cologne Act outlines regulations related to discharges into waters of the State, which is defined as any surface water or groundwater, including saline waters, within the boundaries of the State. As further discussed below, the City of West Covina has provisions in its municipal code to ensure that projects are implemented in compliance with the Porter-Cologne Act.

National Pollutant Discharge Elimination System Construction General Permit

Pursuant to Section 402(p) of the CWA, which requires regulations for permitting certain storm water discharges, the SWRCB has issued a Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (NPDES No. CAS000002, California Water Resources Control Board Resolution No. 2001-046; Modification of Water Quality Order 99-08-DWQ, SWRCB, NPDES, General Permit for Storm water Discharges Associated with Construction Activity). This

permit was revised on September 2, 2009 (Construction General Permit Order 2009-0009-DWQ) and was subsequently amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ. Order No. 2012-0006-DWQ became effective on July 17, 2012.

Under the Construction General Permit, storm water discharges from construction sites with a disturbance area of one acre or more are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit requires a Notice of Intent (NOI); a construction site risk assessment to determine appropriate coverage level; and preparation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include best management practices (BMPs) to be implemented during construction, site maps, a Construction Site Monitoring Program (CSMP), and sediment basin design calculations. The primary objective of the SWPPP is to ensure that the responsible party properly constructs, implements, and maintains BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. The SWPPP also outlines the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

The Construction General Permit also includes post-construction requirements for projects to match pre-project runoff volume through the use of non-structural or structural measures. For sites larger than two acres, a project should also maintain the site's pre-project runoff rate.

Regional

Regional Water Quality Control Board

The Regional Water Quality Control Board (RWQCB) – Los Angeles Region is responsible for preserving and enhancing water quality and to protect the beneficial uses³ of water bodies in the Los Angeles Basin, including the San Gabriel River watershed. To this end, the RWQCB: (1) designates beneficial uses for surface and subsurface waters (groundwater); (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's antidegradation policy; (3) describes the implementation needed to achieve water quality objectives and to protect the beneficial uses of all waters in the region; (4) describes the comprehensive monitoring and assessment program used to evaluate the effectiveness of the measures; and (5) provides an overview of water resource management studies and projects that are in progress in the region. The beneficial uses of the adjacent Walnut Creek Wash include the following:

Municipal and Domestic Supply (MUN). Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

Ground Water Recharge (GWR). Waters are used for natural or artificial recharge of groundwater for purposes that may include, but are not limited to, future extraction, maintaining water quality, or halting saltwater intrusion into freshwater aquifers.

Water Contact Recreation (REC1). Waters are used for recreational activities involving bodily contact with water where ingestion of water is reasonably possible. These uses may include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, whitewater activities, fishing, and use of natural hot springs.

Non-Contact Water Recreation (REC2). Waters are used for recreational activities involving proximity to water, but not normally involving bodily contact with water where

³ Beneficial uses refers to the various ways that water can be used for the benefit of people and wildlife (i.e., drinking, swimming, agricultural water supply, and support of aquatic habitats).

ingestion of water would be reasonably possible. These uses may include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing and aesthetic enjoyment in conjunction with the above activities.

Warm Freshwater Habitat (WARM). Waters support warm water ecosystems that may include, but are not limited to, preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife (including invertebrates).

Wildlife Habitat (WILD). Waters support wildlife habitats that may include, but are not limited to, the preservation and enhancement of vegetation and prey species used by waterfowl and other wildlife.

Wetland Habitat (WET). Uses of water that support wetland ecosystems, including, but not limited to, preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions which enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally occurring contaminants.

It should be noted that the portion of the Walnut Creek Wash that is adjacent to the Project site is all concrete with vertical sides, which provides no resources or facilities that specifically enhance or support these uses other than when water is actively flowing in the channel.

Water bodies that do not meet water quality standards are deemed “impaired”, and under Section 303(d) of the CWA, are placed on a list of impaired waters for which a TMDL must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a “factor of safety” included). Once established, the TMDL is allocated among current and future pollutant sources to the water body.

National Pollutant Discharge Elimination System Permit for Los Angeles County

On November 8, 2012, the RWQCB adopted Order R4-2012-0175 (Waste Discharge Requirements for Municipal Separate Storm Sewer System) (MS4) Discharges within Coastal Watersheds of Los Angeles County (MS4 Permit). Order R4-2012-0175 became effective on December 28, 2013 and serves as the NPDES permit for coastal watershed storm water and non-storm water discharges originating from the Los Angeles County Region. The permit covers the land areas in the Los Angeles County Flood Control jurisdiction, unincorporated areas of Los Angeles County, and 84 cities within the County of Los Angeles. The City of West Covina is included in the MS4 Permit as a permittee under Order R4-2012-0175. In coordination with permittees under MS4 Permit, RWQCB staff perform annual performance reviews and evaluations of the City’s storm water management program and NPDES compliance activities. In compliance with the permit, Los Angeles County has implemented a storm water quality management program, entitled the Standard Urban Stormwater Mitigation Plan (SUSMP), with the goal of achieving the requirements of the permit and reducing the amount of pollutants in storm water and urban runoff, mainly through implementation of Low Impact Design (LID) design criteria and related requirements.

The Los Angeles County Department of Public Works Hydrology Manual (2006) contains the SUSMP that applies to development and re-development projects within Los Angeles County. The SUSMP includes TMDLs for pollutants in CWA Section 303(d) and contains BMPs for managing storm water quality during construction projects. The Los Angeles County Department of Public Works Hydrology Manual also contains design techniques for storm drain systems.

The City of West Covina is subject to the waste discharge requirements of the NPDES Permit for Los Angeles County. The County and incorporated cities in the County are co-permittees under the NPDES permit and have legal authority to enforce the terms of the permit in their jurisdictions. The ultimate goal of the NPDES Permit and the related urban storm water management program is to protect the beneficial uses of the receiving waters. To implement the requirements of the permit, the County developed guidelines to control and mitigate storm water quality and quantity impacts to receiving waters as a result of new development and redevelopment. The guidelines require individual development projects to prepare and implement Water Quality Management Plans (WQMPs) that identify post-construction BMPs to reduce discharges of pollutants into storm water.

Local

West Covina General Plan

The “Our Natural Community” Section of the City General Plan (PlanWC), Sub-Section 2. Water has the following policies and actions regarding water resources:

Policy 1.4 Continue to protect areas of beneficial natural groundwater recharge by preventing uses that can contaminate soil or groundwater.

Action 1.4a The City and the appropriate water providers shall protect groundwater recharge and groundwater quality when reviewing new development projects.

Policy 1.5 Where appropriate, new development shall minimize impervious area, minimize runoff and pollution, and incorporate best management practices.

Action 1.5 Develop standards to increase pervious surfaces to recharge groundwater basin, where appropriate.

In addition, the “Our Well Planned Community Section, Water Sub-Section, contains the following policy and action regarding water resources:

Policy 5.7 Manage & develop safe, reliable, economical water supply for existing & planned new customers.

Action 5.7a Reduce demand through water conservation techniques.

Finally, PlanWC “Our Health and Safe Community” Section contains the following policy and action regarding flooding and safety:

Policy 6.18 Take actions to reduce the potential for loss of life or property in flood zones and potential dam inundation areas.

Action 6.18d Investigate siting of future critical facilities in only those areas beyond the 60-minute line that signifies the time between dam failure and inundation.

There are no water resources identified in PlanWC on the Project site. The consistency of the proposed Project with this policy and action related to water resources is discussed in Section 4.8.5, *Environmental Impacts*, of this Program EIR.

Municipal Code

The City's "Control of Pollutants from New Development/Redevelopment Projects" (Chapter 9-36 of the Municipal Code) was adopted to comply with the CWA, the Porter-Cologne Act, and the City's NPDES MS4 Permit. The ordinance sets regulations to protect and enhance the water quality in water bodies, water courses, and wetlands in the City. The regulations address connections to the City's MS4 system, prohibited discharges, compliance with NPDES permits, implementation of BMPs, spill containment, required notification of accidental discharges, and property owner responsibility for illegal discharges.

This ordinance also includes requirements for the protection of the storm drainage system, non-stormwater and stormwater discharges from construction activities, and the preparation of WQMPs that identify permanent BMPs in new development and major redevelopment projects. With respect to the preparation of WQMPs, prior to the issuance of any grading or building permit, all qualifying land development/redevelopment projects are required to submit a WQMP to the City Engineer for review and approval.

4.8.2 METHODS

Psomas conducted a detailed assessment of existing drainage conditions on the Project site, then evaluated future drainage conditions based on the proposed Project improvements, including timing or phasing of construction. The utilities assessment was based on the code requirements for new hospitals and medical office buildings. All flood information was based the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the area. The data on the existing conditions and future requirements of the Project were also incorporated into the QVHSP for consistency.

4.8.3 EXISTING SETTING

Surface Waters

The City of West Covina is located within the San Gabriel River Watershed; discharges to Reach 1 of the San Gabriel River; and is located within the San Gabriel River Watershed Management Area (SGRWMA). The San Gabriel River ultimately drains to the Pacific Ocean. Due to its relatively flat topography, runoff in the City typically forms as sheet flow that is then intercepted by stormwater conveyance systems. Major drainages in the area such as the San Gabriel River flow to the southwest and eventually drain to the Pacific Ocean. There are five major drainages within the City including Big Dalton Wash, Charter Oak Creek, Puente Creek, Vine Creek, and Walnut Creek (General Plan EIR Figure 4.8-1, *Major Drainages*). The Walnut Creek (flood control) Channel runs east to west through the middle of the City, south of and roughly parallel to Interstate (I)-10. This channel is just north of the Queen of the Valley Hospital property and flows west into the San Gabriel River approximately two miles west of the City. According to the FEMA, most of the City would be subject to flooding from a 500-year storm but only a few small areas, not including the Queen of the Valley Hospital property, would be subject to flooding from a 100-year storm (General Plan EIR Figure 4.8-3, *Flood Hazard Zones*). Surface water quality in the City is governed by the Los Angeles RWQCB, which sets water quality standards in the Water Quality Control Plan for the Los Angeles Region. Common sources of stormwater pollution in the City include litter, trash, pet waste, paint residue, organic material (yard waste), fertilizers, pesticides, sediments, construction debris, metals from automobile brake pad dust, air pollutants that settle on the ground or attach to rainwater, cooking grease, illegally dumped motor oil, and other harmful fluids.

Groundwater

The City of West Covina is underlain by the San Gabriel Valley Groundwater Basin, which consists of water-bearing sediments that underlie most of the San Gabriel Valley and a portion of the upper Santa Ana Valley. Concerns about the sustainability of groundwater supply in the basin led to the adjudication of water rights and the establishment of a Main San Gabriel Basin Watermaster in 1973. The Basin Watermaster currently estimates the amount of water in storage at 7.45 million acre-feet and has attributed recent declines compared to historic levels to the effects of the current drought. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies. The Basin contains several contaminant plumes including nitrates, volatile organic compounds, and perchlorate from past industrial processes. Cleanup of these contaminants continues today. Despite their presence, the overall groundwater quality of the Basin for potable use is high.

Water Quality

The SWRCB and the RWQCB have adopted a Basin Plan for Los Angeles County, which includes water quality management goals for Walnut Creek Wash (Hydro Unit 405.41) that flows into the San Gabriel River⁴ (Reach 1) two miles downstream of the Hospital site (RWQCB-LAR 2000). Portions of the wash are considered appropriate for the following potential or intermittent beneficial uses, which are directly related to water quality:

- Municipal and Domestic Supply (MUN);
- Groundwater (GWR);
- Water Contact Recreation (REC-1) although access is prohibited by the Los Angeles County Flood Control District;
- Non-Water Contact Recreation (REC-2);
- Warm Freshwater Habitat (WARM) but only in the foothills and near the confluence with the San Gabriel River;
- Wildlife Habitat (WILD) also only in the foothills and near the confluence with the San Gabriel River; and
- Wetland Habitat (WET) also only near the confluence of the San Gabriel River.

Although specific portions of the wash support these regional beneficial uses, the portion of the channel adjacent to the Project site is lined with concrete with vertical sides; therefore, it would provide little or no support for these beneficial uses. It should be noted the proposed Project would not encroach into or impact the flood control corridor (i.e., channel and adjacent maintenance roads), thus Project development would not have any direct and only incremental impacts on potential beneficial uses along the Walnut Creek Wash.

⁴ A Clean Water Act Section 303(d) impaired water body and the Walnut Creek Wash contributes toxicity to Reach 1 of the river.

4.8.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements.
- Otherwise substantially degrade water quality.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onsite or offsite.
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of pollutant runoff.
- 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?
- Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be 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)?
- Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Would the project result in inundation by seiche, tsunami, or mudflow?

4.8.5 ENVIRONMENTAL IMPACTS

Threshold 8.1	Would the project violate any water quality standards or waste discharge requirements?
Threshold 8.2	Would the project otherwise substantially degrade water quality?

Short-Term Construction Impacts

The Project would involve demolition and construction activities that would generate pollutants (e.g., sediments, building materials and wastes) and other onsite materials that could enter the storm water drainage system. Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Non-sediment-related pollutants of concern during construction are associated with construction materials and non-storm water flows and generally include construction materials (e.g., paint and stucco); chemicals, liquid products, petroleum products used in building construction or the maintenance of heavy equipment; and concrete and related cutting or curing residues.

Without appropriate storm water management, construction site runoff would enter adjacent storm drain lines and contribute to pollutants in the storm water. The CWA establishes a framework for regulating potential water quality impacts from construction activities through the NPDES program. Construction contractors would be required to obtain coverage under the NPDES Construction General Permit. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement a SWPPP, which must include erosion-control and sediment-control BMPs; wind and water tracking controls; hazardous material management practices; and other site-management BMPs that would meet or exceed measures required by the determined risk level of the Construction General Permit. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is also a required component of the SWPPP.

Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap or filter sediment once it has been mobilized. In addition to erosion- and sediment-control BMPs, the following types of BMPs would be implemented, as needed, during construction: waste and materials management; non-storm water management; training and education; and inspections, maintenance, monitoring, and sampling. The construction-phase BMPs would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides, including legacy pesticides).

The proposed Project does not propose any improvements or construction to the Walnut Creek Wash; however, it is adjacent to the wash and runoff from the site would eventually reach the wash and ultimately the San Gabriel River. In addition, both short- and long-term water quality documentation is required by state regulations to cover Project construction and operation. Therefore, short-term water quality impacts of the Project are potentially significant, and mitigation is recommended.

Mitigation Measures

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

Summary of Impact. Compliance with the requirements of the NPDES Construction General Permit, including preparation of an SWPPP as outlined in Mitigation Measure HYD-1, would ensure impacts from the proposed Project to receiving waters from storm water and non-storm water discharges during construction would be reduced to less than significant levels.

Long-Term Operational Impacts

Improvements allowed by the proposed QVHSP is expected to be a source of bacteria/pathogens, nutrients, and suspended solids that may enter the storm water. These pollutants would add to existing impairments of bacteria/pathogens and metals for Walnut Creek Wash and eventually the San Gabriel River downstream of the site. While the existing storm drain facilities are adequate to handle storm water runoff from the Project site during the 100-year storm event (refer to the analysis provided for Thresholds 8.5 and 8.6, below), there are no defined, downstream regional storm water quality facilities specifically designed to mitigate the pollutants in the runoff from the proposed Project. Therefore, all storm water quality mitigation would need to be accomplished onsite.

A number of BMP concepts would be utilized to address storm water quality mitigation requirements. LID and BMP systems would generally be sized to handle the two-year water quality storm event, per County requirements. The conceptual water quality management system includes the following:

- **Hydrologic Source-Control Low Impact Development Best Management Practices.** BMPs could be a hydrologic source-control LID, where runoff is directed to landscaped areas and retained. In some cases, this retention would be in the form of a depressed area such as a basin, but more commonly it would be an area that is held a few inches below the surrounding street, parking area, or storm drain inlet.
- **Infiltration Low Impact Development Best Management Practice.** Where retention of runoff or pervious pavement installations are not feasible, BMPs consisting of injection drywells, underground perforated pipe storage and infiltration trenches could be used. These infiltration BMPs can be installed almost anywhere (including in landscaped areas and under pavement) but should be avoided within five feet of buildings and walls.
- **Bioretention Systems.** In locations where the other LID BMPs are not feasible or unable to mitigate the full design capture volume (DCV), or where filtration and/or clarification of inflows is not feasible, bioretention systems would be installed. These volume-based systems include engineered soil bioretention BMPs, such as manufactured parkway planter or street tree well systems. Bioretention BMPs installed in public street right-of-way would only treat runoff from the public streets.

As required, source-control BMPs would also be implemented and involve prohibitions or restrictions on activities that can lead to pollution, including trash control, landscape maintenance, painting, car washing, hazardous chemicals, and wastes. Details of the specific source-control BMPs to be used for this Project would be included in the project-specific WQMPs.

The proposed Project does not propose any improvements or construction to the Walnut Creek Wash; however, it is adjacent to the wash and runoff from the site would eventually reach the wash and ultimately the San Gabriel River. In addition, both short- and long-term water quality documentation is required by state regulations to cover Project construction and operation. Therefore, long-term water quality impacts of the Project are potentially significant, and mitigation is recommended.

Mitigation Measures

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

Summary of Impacts. Implementation of onsite BMPs would remove pollutants in the storm water from the site and prevent contributions to water pollution to Walnut Creek Wash and ultimately to the San Gabriel River. Compliance with Mitigation Measures HYD-1 and HYD-2 would prevent violations of water quality standards and the degradation of storm water quality. Both short- and long-term potential water quality-related impacts would be reduced to less than significant levels with implementation of these measures.

Local Policies

Through implementation of Mitigation Measures HYD-1 through HYD-3, the proposed Project would be consistent with Policies 1.4 and 1.5 and Actions 1.4 and 1.5 in the "Our Natural Community" Section of PlanWC, Sub-Section 2. Water, as well as Policy 5.7 and Action 5.7a of the "Our Well Planned Community" Section, Water Sub-Section. These policies and actions address protection of water quality and reducing urban pollution in local drainages. Finally, implementation of these measures would make the Project consistent with the water quality requirements of the City Municipal Code Section 9-36.

Summary of Impact. Implementation of Mitigation Measures HYD-1 through HYD-3 would reduce potential impacts of the Project relative to water quality to less than significant levels, and no additional mitigation is required.

Threshold 8.3	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onsite or offsite?
Threshold 8.4	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of pollutant runoff.

Due to its relatively flat topography, runoff in the City typically forms as sheet flow that is then intercepted by stormwater conveyance systems. Major drainages in the area such as the San Gabriel River flow to the southwest and eventually drain to the Pacific Ocean. There are five major drainages within the City, including Big Dalton Wash, Charter Oak Creek, Puente Creek, Vine Creek, and Walnut Creek (General Plan EIR Figure 4.8-1, *Major Drainages*). The Walnut Creek (flood control) Channel runs east to west through the middle of the City, south of and roughly parallel to I-10. This channel is just north of the Queen of the Valley Hospital property and flows west into the San Gabriel River approximately two miles west of the City. According to FEMA, most of the City would be subject to flooding from a 500-year storm, but only a few small areas, not including the Queen of the Valley Hospital property, would be subject to flooding from a 100-year storm (General Plan EIR Figure 4.8-3, *Flood Hazard Zones*). Surface water quality in the City is governed by the Los Angeles RWQCB, which sets water quality standards in the Water Quality Control Plan for the Los Angeles Region. Common sources of stormwater pollution in the

City include litter, trash, pet waste, paint residue, organic material (yard waste), fertilizers, pesticides, sediments, construction debris, metals from automobile brake pad dust, air pollutants that settle on the ground or attach to rainwater, cooking grease, illegally dumped motor oil, and other harmful fluids.

The Project site is already fully improved with impervious surfaces except for the former Sunset Field (park) site in the northeast corner of the property. Development of this area would eventually cover over the area with impervious surfaces, which may incrementally increase onsite runoff. It would be the responsibility of the engineers working on Project-related improvements to assure that onsite runoff does not exceed current levels or does not exceed the capacity of downstream flood control or storm runoff facilities.

The proposed Project would maintain the existing drainage patterns. According to FEMA FIRM map number 06037C1700F the site is outside of the 100-year flood plain. The site is in an area of 0.2 percent annual chance of flood (i.e., 500-year storm event). Structural or Treatment Control BMPs are required for this Project under the LID conditions required by the City. The evaluation of Project hydrology conducted by Psomas indicates that volume-based or flow-based design standards may be used separately or in combination for more detailed Project design (i.e., volume-based criteria are used in the sizing of detention or infiltration structures while flow-based criteria are used on swales, catch basin devices). LID requirements, approved by the RWQCB, call for the treatment of the peak mitigation flow rate or volume of runoff produced by a 0.75-inch 24-hour rainfall event. Various stormwater treatment facilities are to be provided throughout the site to capture and treat stormwater runoff from the site. These specific improvements would be identified in actual grading and building plans, as appropriate, as each phase of development occurs. To prevent potential changes in surface runoff that would degrade water quality, the following measure is proposed:

Mitigation Measures

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

Summary of Impact. With implementation of Mitigation Measure HYD-3, potential changes in drainage patterns on site that could lead to erosion, siltation, or flooding at downstream facilities. would be reduced to less than significant levels.

Threshold 8.5	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?
Threshold 8.6	Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

As identified above, current FEMA⁵ flood mapping indicates the site is outside of the 100-year flood plain and is only in an area of 0.2 percent annual chance of flood (i.e., 500-year storm event). Structural or Treatment Control BMPs are required for this Project under the LID conditions required by the City as part of the regional MS4 permit administered by the RWQCB. Therefore, the Project would have less than significant impacts related to identified flood zones and would not place any structures within a 100-year flood zone or impede or redirect flood flows. No mitigation is required.

Threshold 8.7	Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be 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)?
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The City of West Covina is underlain by the San Gabriel Valley Groundwater Basin, which consists of water-bearing sediments that underlie most of the San Gabriel Valley and a portion of the upper Santa Ana Valley. Concerns about the sustainability of groundwater supply in the basin led to the adjudication of water rights and the establishment of a Main San Gabriel Basin Watermaster in 1973. The Basin Watermaster currently estimates the amount of water in storage at 7.45 million acre-feet and has attributed recent declines compared to historic levels to the effects of the current drought. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies. The Basin contains several contaminant plumes including nitrates, volatile organic compounds, and perchlorate from past industrial processes. Cleanup of these contaminants continues today. Despite their presence, the overall groundwater quality of the Basin for potable use is high.

Expansion of the hospital would result in an increase in potable water use (for more details, see Section 4.15, *Utilities and Service Systems*). In general water consumption may increase by approximately 50 percent based on the anticipated increase in total building square footage and employees. This increase in hospital services is not expected to have significant impact on local water supplies, including the use of local groundwater, as outlined in the Urban Water Master Plan (UWMP) prepared for Suburban Water Systems (SWS 2016), which in turn serves the Project area with potable water. In addition, the Upper San Gabriel Valley Municipal Water District (USGVMWD) provides groundwater to local serving entities and has its own UWMP (USGVMWD 2016). Both of the UWMPs allow for planned growth under PlanWC as well as various worst-case drought year scenarios. For a detailed assessment of existing and future water supply, see Section 4.15. *Utilities and Service Systems*.

Development of the proposed Project would also result in an increase in impervious surfaces. Although the existing hospital site is fully developed at this point, the former Sunset Field (park) site is largely pervious, and its eventual conversion to impervious surfaces could incrementally increase offsite runoff and incrementally reduce recharge of the local groundwater by reducing infiltration flow from the former park site. However, implementation of the recommended Mitigation Measure HYD-3 would help reduce this potential impact to a less than significant level. It would require the entire Project to implement LID designs and improvements to help allow for onsite infiltration of runoff, and no additional mitigation is required.

⁵ Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) map number 06037C1700F

Threshold 8.8	Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
Threshold 8.9	Would the project result in inundation by seiche, tsunami, or mudflow?

The discussion under Thresholds 8.3 and 8.4 address potential flooding impacts from major storm events, and they were determined to be less than significant. Flooding from the failure of a dam or levee would be considered significant for a critical service facility like the Queen of the Valley Hospital if it were inside of the 60-minute limit between dam failure and inundation, which would not give the hospital sufficient time to evacuate patients and staff before inundation once notice of a dam failure was given.

The only water impoundments large enough, close enough, and/or high enough (i.e., at a higher elevation) to the Project site to represent an inundation hazard would be the Santa Fe Dam Recreation Area, located 3.1 miles north of the site in Irwindale (15501 Arrow Highway), or the Walnut Creek spreading basin located 4.3 miles northeast of the site on the Walnut Creek Wash. According to the City's Natural Hazard Mitigation Plan, Although the Santa Fe Dam is the nearest to the city of West Covina, it is a dry dam, it is utilized to control heavy runoff and to support ground water maintenance with its numerous settling basins. The Santa Fe Dam is controlled by the Army Corps of Engineers and is located in the City of Irwindale. The Santa Fe Dam is an earth-filled dam; the dam's construction was started in 1941 and completed in 1949. Construction was delayed during World War II. Santa Fe Dam would be the downstream control if there were to be any problems with the Morris or San Gabriel Dam in Azusa Canyon. Any overflow from failure of these dams is projected to spill out into the San Gabriel River wash and the secondary control area to the west of the 210/605 Freeway interchange. Downstream areas of inundation from this type of event are not projected to impact the City of West Covina but will impact the City of Baldwin Park to the west.

The Walnut Creek spreading basin is controlled by the Los Angeles County Flood Control District and is located in the City of Covina on the West Covina - Covina city line. The spreading basin is just north of Garvey Ave North and west of Grand Avenue. The spreading basin is fed by the Walnut Creek Wash and any overage should flow down the storm channel from this location. Flooding from this water source might only be possible if the body of water is disturbed by shaking due to an earthquake, or if any water was displaced by a landslide into the basin. This is a natural basin and there is no dam holding back the water.

The Santa Fe Dam does not impound enough water to represent a significant flooding threat to the site, and any overflow from this facility would flow down the San Gabriel River Channel. The Walnut Creek spreading ground is far upstream of the site and does not impound a sufficient amount of water at a high enough elevation to represent a significant risk of flooding to the Project site if it were to "fail" (i.e., catastrophic release at full capacity). For these reasons, the proposed Project is consistent with PlanWC Policy 6.18 and Action 6.18a regarding protection from flooding and dam inundation. As a result, the Project would not have a significant impact relative to dam inundation.

A seiche is a standing wave within an enclosed body of water (e.g., surface water, reservoirs, above-ground water tanks), typically generated by large earthquakes. There are no such bodies of water or tanks within a half mile up-gradient/upstream (i.e. at a higher elevation) that would result in substantial water flow at the Project site, should they fail during a seismic event. Therefore, the Project would not be subject to significant impacts from seiches.

A tsunami is a long wavelength sea wave that can cause great damage in coastal areas after certain kinds of earthquakes. The Project site is 29 miles inland from the Pacific Ocean and at an elevation that is 360 feet higher than sea level. Therefore, the Project would not be subject to significant impacts from tsunamis.

The Project site is not proximate to any steep slopes, natural or man-made, that could result in mud flow across the site. Therefore, the Project would not be subject to significant impacts from mudflows.

Summary of Impacts. The proposed Project would not experience significant impacts related to flooding from dam failure, seiches, tsunamis, or mudflows, and no mitigation is required.

4.8.6 CUMULATIVE IMPACTS

The geographic context for the Hydrology and Water Quality cumulative impact analysis is the Walnut Creek Wash Watershed, which is part of the larger San Gabriel River Watershed. Future developments in this watershed would result in an increase in impervious surfaces in addition to changes in land uses and their associated increases and changes in pollutant runoff. However, all development in this watershed must obtain coverage under and comply with requirements of applicable local, State, and federal regulations established for purpose of protecting water quality, including the NPDES Permit for Los Angeles County, the NPDES Construction General Permit, and local ordinances that address storm water discharges into municipal systems. Although new development is anticipated to occur within the watershed, including potentially undeveloped sites in the vicinity of the Project site, new development and significant redevelopment would have to minimize their individual impacts to water quality and pollutant transport through implementation of construction-related and permanent structural and non-structural BMPs. With implementation of project-appropriate BMPs, the anticipated quality of storm water runoff expected from development under the proposed QVHSP, and cumulative projects would not contribute pollutants that would cause or contribute to a violation of the water quality standards for downstream receiving waters. Therefore, the proposed Project itself would not result in a significant contribution to any cumulative water quality impacts from regional development.

Storm water flow would increase as development under the proposed QVHSP and cumulative projects result in greater amounts of impervious surfaces. Impacts associated with new development within the Walnut Creek Wash Watershed and the larger San Gabriel River Watershed can be effectively addressed at a site-specific level to comply with existing regulations and to reduce potential impacts. Additional local drainage facilities would be constructed by developers as they become necessary. Therefore, the proposed Project, along with implementation of other development within the drainage areas, would not result in significant cumulative hydrology or drainage impacts.

4.8.7 IMPACTS OF MITIGATION MEASURES

Implementation of Measures HYD-1 through HYD-3 may result in initial delays in Project construction until required plans are completed, but actual implementation of the measures would not themselves result in any significant environmental impacts related to hydrology or water quality.

4.8.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of HYD-1 through HYD-3, potential water-related impacts of the proposed Project would be reduced to less than significant levels.

4.8.9 REFERENCES

- Federal Emergency Management Agency (FEMA). 2016. Flood Insurance Rate Map (FIRM) map number 06037C1700F.
- Regional Water Quality Control Board, Los Angeles Region (RWQCB-LAC). 2000. *State of the Watershed – Report on Surface Water Quality, The San Gabriel River Watershed*.
- Regional Water Quality Control Board (RWQCB). 2012. *Statewide General NPDES Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (NPDES No. CAS000002, California Water Resources Control Board Resolution No. 2001-046; Modification of Water Quality Order 99-08-DWQ, SWRCB, NPDES, General Permit for Storm water Discharges Associated with Construction Activity). This permit was revised on September 2, 2009 (Construction General Permit Order 2009-0009-DWQ) and was subsequently amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ. Order No. 2012-0006-DWQ became effective on July 17, 2012.
- Suburban Water Systems (SWS). 2016. *Draft 2015 Urban Water Management Plan, Suburban Water Systems*. A division of the SouthWest Water Company. MNS Engineers, Inc. June 15, 2016. <https://www.swwc.com/suburban/>
- . Personal communication with Darleen Phares, SWS Conservation Manager, December 6, 2018.
- State Water Resources Control Board (SWRCB). 2013 (August 5, last updated). *Impaired Water Bodies - 2010 Integrated Report* (Clean Water Act Section 303(d) List / 305(b) Report) — Statewide. Sacramento, CA; SWRCB. http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml
- Upper San Gabriel Valley Municipal Water District (USGVMWD). 2016. *Urban Water Management Plan*. Stetson Engineers, Inc. June 2016.
- West Covina, City of (City). 2018. Natural Hazard Mitigation Plan (MHMP). City of West Covina. November 2018. <http://www.westcovina.org/departments/fire-/disaster-preparedness/natural-hazard-mitigation-plan>
- . 2016. West Covina General Plan (Plan WC) and Environmental Impact Report. Rincon Associates, Inc. December 2016.

4.9 LAND USE AND PLANNING

This section describes the current land uses on the Project site and in the immediate vicinity, and discusses potential land use impacts that could result from implementing the proposed Queen of the Valley Hospital (QVH or Hospital) Project. Information presented in this section is based on field reconnaissance, review of aerial photographs, and review of relevant planning documents referenced in this section. An evaluation of the proposed Project's consistency with the West Covina 2016 General Plan (PlanWC) (including goals and policies), implementation of the proposed Queen of the Valley Hospital Specific Plan (QVHSP), and the Southern California Association of Governments' (SCAG's) *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) is provided.

A Notice of Preparation (NOP) comment letter was also received from SCAG requesting that the consistency of the proposed Project with the 2016 RTP/SCS goals be addressed. SCAG identifies that RTP/SCS strategies provide guidance for considering the Project in the context of these goals and recommends that the 2016 RTP/SCS Final Program EIR mitigation measures be used for guidance, as appropriate. The South Coast Air Quality Management District (SCAQMD) sent an NOP letter requesting the Project be evaluated against the local Air Quality Management Plan (AQMP).

During the Scoping Meeting several comments were made about PlanWC and zoning consistency, and two of the NOP letters from members of the public requested that the Program EIR evaluate land use and planning impacts of the Project on surrounding land uses.

4.9.1 RELEVANT POLICIES AND REGULATIONS

State

The State of California Legislature has established the authority and scope to prepare and implement specific plans. The State requires that all cities and counties in California prepare and adopt a comprehensive General Plan for the physical development of their areas of jurisdiction. To implement the policies described in the General Plan, regulating programs need to be adopted (i.e., zoning ordinances, subdivision ordinances, building and housing codes, etc.). California State law authorizes cities with complete General Plans to prepare and adopt specific plans (Government Code Section 65450 – 65457). Local planning agencies or their legislative bodies may designate areas within their jurisdiction as areas for which a specific plan is “necessary or convenient” (Government Code Section 65451). Specific plans are intended to serve as bridges between the local General Plan and individual development proposals. Specific plans contain both planning policies and regulations, and may combine zoning regulations, capital improvement programs, detailed development standards, design guidelines, and other regulatory requirements into one document, which are designed to meet the needs of a specific area.

Regional

Regional land use plans and policies that are applicable to the proposed Project include SCAG's 2016–2040 RTP/SCS and the SCAQMD's AQMP. The 2016–2040 RTP/SCS is discussed below and the AQMP is discussed in Section 4.2, *Air Quality*, of this Program EIR.

Southern California Association of Governments

The Southern California Association of Governments is the Metropolitan Planning Organization (MPO) for six counties: San Bernardino, Orange, Riverside, Los Angeles, Ventura, and Imperial. The region encompasses a population exceeding 19 million persons in an area of more than 38,000 square miles. As the designated MPO, the federal government mandates that SCAG researches and prepares plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews environmental documents of projects with regional significance for consistency with regional plans. Among the leading activities SCAG undertakes are:

- Maintain a continuous, comprehensive, and coordinated planning process (the “3 Cs”) resulting in a Regional Transportation Plan (RTP) and a Federal Transportation Improvement Program (FTIP).
- Develop a Sustainable Communities Strategy (SCS) to address greenhouse gas (GHG) emissions as an element of the RTP.
- Develop demographic projections.
- Develop integrated land use, housing, employment, and transportation programs and strategies for the South Coast Air Quality Management Plan (AQMP).
- Serve as co-lead agency for air quality planning in the Central Coast and Southeast Desert Air Basin districts.
- Responsible for developing and ensuring that the RTP and the FTIP conform to the purposes of the State Implementation Plans for specific transportation-related criteria pollutants, per the Clean Air Act.
- Serve as the authorized regional agency for intergovernmental review of proposed programs for federal financial assistance and direct development activities.
- Review environmental impact reports for projects having regional significance to ensure they are in line with approved regional plans.
- Develop an area-wide waste treatment management plan.
- Prepare a Regional Housing Needs Assessment.
- Along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council, prepare the Southern California Hazardous Waste Management Plan.

The Southern California Association of Governments has developed a number of plans to achieve these regional objectives. The most applicable to the Project is the 2016–2040 RTP/SCS. The Southern California Association of Governments has developed the Southern California Regional Comprehensive Plan (RCP) as a planning framework for the development and implementation of guidelines applied to both the public and private sectors. The RCP functions as a voluntary “toolbox” to assist local jurisdictions in making their General and Specific Plans and individual projects more sustainable.

2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

Federal guidelines require that all new regionally significant transportation projects be included in the RTP before they can receive federal or State funds or approvals. The Southern California Association of Governments (SCAG) submits projects in Los Angeles County for inclusion in the RTP. The RTP must be updated and federally approved every four years. Federal approval requires a positive demonstration that the RTP projects will not generate travel emissions that exceed those assumed in the applicable AQMP; this requirement is known as “transportation conformity”.

The Southern California Association of Governments adopted the 2016–2040 RTP/SCS on April 7, 2016. The RTP is a long-range transportation plan that provides a vision for regional transportation investments over a period of 20 years or more. Using growth forecasts and economic trends, the RTP considers the role of transportation in a more holistic light, including economic factors, environmental issues, and quality-of-life goals. The RTP provides an opportunity to identify transportation strategies today that address mobility needs for the future. The SCS is an element of the RTP that demonstrates the integration of land use, transportation strategies, and transportation investments within the RTP. This requirement was put in place by the passage of Senate Bill (SB) 375 (discussed in Section 4.6, *Greenhouse Gas Emissions*), with the goal of ensuring that the SCAG region can meet its regional GHG reduction targets set by the California Air Resources Board (CARB). The SCS exceeds the targets issued by CARB (which are an 8 percent reduction by 2020 and a 13 percent reduction by 2035), resulting in a 9 percent reduction by 2020 and 16 percent by 2035 (SCAG 2016).

With the adoption of the 2016–2040 RTP/SCS, the areas previously known as 2 percent Strategy Opportunity Areas were updated by SCAG and replaced with what are now called “High Quality Transit Areas” (HQTAs), which are a part of, and integrated into, the SCS portion (Chapter 4) of the 2016–2040 RTP/SCS. The overall land use pattern in the RTP/SCS focuses jobs and housing in the region’s designated HQTAs that have been identified in the region. An HQTA is generally a walkable transit village or corridor, consistent with the adopted RTP/SCS that has a minimum density of 20 dwelling units per acre and is within 0.5-mile of a well-served transit stop with 15-minute or less service frequency during peak commute hours. The RTP/SCS assumes that 51 percent of new housing developed between 2008 and 2035 will be in HQTAs, along with 53 percent of new employment growth (compared with 39 and 48 percent, respectively in 2008). The RTP/SCS predicts that the number of households in HQTAs will double by 2035. As shown in Exhibit 4.9-1, the Project site is located in a designated HQTA. Additionally, the northern portion of the Project site is in an existing Transit Priority Area, which is an area within 0.5-mile of a major transit stop (SCAG 2016).

The proposed Project’s consistency with relevant RTP/SCS policies that were provided in SCAG’s NOP comment letter (see Appendix B of this Program EIR) is evaluated in Table 4.9-1 in this section.

City of West Covina

General Plan

PlanWC is a long-range policy document that presents the City’s vision for the next 15 to 20 years. PlanWC contains many policies and actions that express the City’s goals on how it wants to develop in the future and what kind of City it wants to be as it moves into the future. Table 4.9-2 provides a consistency analysis of the Project with the various applicable PlanWC policies and actions.



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Source: KTG 2018

Existing Land Uses

Exhibit 4.9-1

Queen of the Valley Hospital Specific Plan EIR



Map not to scale

(12/06/2018 MMD) R:\Projects\WCO\3WCO010100\Graphics\EIR\ex_Existing_LU.pdf

The Queen of the Valley Hospital Specific Plan (QVHSP) has been created through the authority granted to the City of West Covina by the California Government Code, Sections 65450 through 65453. The QVHSP has been prepared in accordance with the provisions of the California Government Code, which stipulate that a specific plan contain text and diagrams on land use, public facilities, development standards, implementation measures, general plan consistency, etc.

Municipal Code

Two sections of the City's Municipal Code relate to land use and planning: Chapter 17 deals with Planning, and Chapter 26 deals with Zoning. These chapters of the Municipal Code establish the framework of zoning districts in the City and their relationships to the City's General Plan land use designations. In this case, the project includes a comprehensive amendment to the QVHSP. When the QVHSP conflicts with the Municipal Code, the QVHSP shall apply. If the QVHSP is silent about an issue, then the Municipal Code shall apply.

The QVHSP contains land use and development procedures and regulations that identify the permitted land uses on parcels within the Specific Plan area through three assigned zones. It also identifies applicable use regulations, site development criteria (e.g., lot size, density/intensity, yard setbacks, open space, heights, parking, landscaped areas), performance standards, and general design regulations (e.g., site design, building orientation, access, parking areas, landscaping, fencing/screening, lighting, building design). The Municipal Code provides similar guidelines for future development.

4.9.2 METHODS

This analysis compares the characteristics of the proposed Project to determine its consistency with PlanWC (i.e., City General Plan) for the Project site. This analysis also evaluates the compatibility of the Project improvements with surrounding land uses. Finally, the analysis evaluates the Project characteristics against established regional land use and planning policies.

4.9.3 EXISTING SETTING

The Project site currently supports a full functioning community hospital. Offsite, the surrounding area contains the following uses as shown in Exhibit 4.9-1, *Existing Land Uses*:

- **North.** Los Angeles County Flood Control Channel (Walnut Creek Wash) borders the Project site. Further north are single-family homes. The I-10 lies just 1/2 mile away with on/off ramp at West Covina Parkway.
- **East.** Medical office buildings and the Torrey Pines Apartment complex border the QVHSP area. Further east is the West Covina Public Works Department building and the West Covina Fire Department, Rescue Engine 1 station. Across South Sunset Avenue are additional office buildings and single-family homes.
- **South.** Medical office buildings, a gas station, convenience stores, and fast food restaurants are located immediately south of the QVHSP area. Additional residential homes are located further south.
- **West.** Immediately adjacent to the QVHSP area is Orangewood Park, which is a community facility with indoor hockey rink, outdoor basketball ball courts, tot lot, skate park, soccer fields, and picnic area. Further east lies the West Covina Unified School District administration building, and across West Merced Avenue are Edgewood Middle and High Schools.

4.9.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to land use and planning if it would:

- Would the project physically divide an established community?

Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

- Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

4.9.5 ENVIRONMENTAL IMPACTS

Threshold 9.1	Would the project physically divide an established community?
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The Queen of the Valley Hospital is located in a mixed-use neighborhood with a variety of residential (single family, apartments, etc.), commercial and office uses along Sunset Avenue, and institutional uses (school office and school sites, etc.) along Merced Avenue. The site is fully developed with various hospital-related uses and facilities, and additional uses would be constructed on the site under the proposed Project. The Queen of the Valley Hospital is a critical care facility, and in some ways is a focal point for the community and an integral part of that community. The proposed Project would expand that function into the future. The Queen of the Valley Hospital property does not currently divide or restrict access within the community, and its expansion in the future would not be expected to physically divide the existing surrounding community or an established community on the site, as none exists within the QVHSP area. The proposed expansion would further enhance the hospital's connectivity into the surrounding community by holding community events at the hospital facilities.

Summary of Impact. The proposed Project would not physically divide an established community, so it would have no significant impacts in this regard, and no mitigation is required.

Threshold 9.2	Would the proposed project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
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Regional

Southern California Association of Governments

The fundamental goal of SCAG's 2016–2040 RTP/SCS is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. Table 4.9-1 below presents the proposed Project's consistency with the 2016–2040 RTP/SCS. Guiding policies in the RTP/SCS focus on SCAG's priorities for investment and strategies to preserve, maintain, and optimize the transportation system. Thus, they do not apply directly to the Project (i.e., hospital). However, the analysis of Project consistency with RTP/SCS goals

shows that adoption and implementation of the proposed QVHSP would support the goals of SCAG's 2016–2040 RTP/SCS. No impact would result, and no mitigation is required.

As a hospital, the Project would also have no substantial direct or indirect relationship to regional growth projections included in the 2016–2040 RTP/SCS, which is also noted in Section 4.11, *Population and Housing*, of this Program EIR.

**TABLE 4.9-1
RTP/SCS CONSISTENCY ANALYSIS**

RTP/SCS Goal	CONSISTENCY ANALYSIS
G1: Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent. The proposed Project involves expansion of an existing hospital on the site that would serve the health and medical needs of the City and surrounding region into the future, keeping it competitive and desirable within the Southern California marketplace (Program EIR Section 3.0, <i>Project Description</i>). The Project would increase the number of employees at the hospital by approximately 50 percent over 10-15 years.
G2: Maximize mobility and accessibility for all people and goods in the region.	Consistent. While the hospital does not have a direct influence on mobility and accessibility, providing expanded health care would reduce travel times and accessibility of health care in this portion of the San Gabriel Valley (Program EIR Section 4.13, <i>Transportation and Traffic</i>).
G3: Ensure travel safety and reliability for all people and goods in the region.	Consistent. The hospital would incrementally reduce regional trips by providing expanded health care services to area residents and making it more accessible and safer by providing such services closer to resident's homes (Program EIR Section 4.13, <i>Transportation and Traffic</i>).
G4: Preserve and ensure a sustainable regional transportation system.	Consistent. The Project would not have significant regional traffic impacts and only attracts local and regional trips by providing critical health care services, thereby incrementally reducing area vehicle miles travelled (VMT) (Program EIR Section 4.13, <i>Transportation and Traffic</i>).
G5: Maximize the productivity of our transportation system.	Not Applicable. The Project would generate new traffic mainly by attracting local and regional trips as a result of providing expanded critical health care services. The Project would result in increased traffic on local streets and freeways, but the Project traffic study does not take into account the reduction in overall trip lengths the Project would produce by providing expanded health care services within the community (Program EIR Section 4.13, <i>Transportation and Traffic</i>).
G6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The Project would incrementally reduce regional vehicle trips by providing expanded health care services in the community, which in turn would reduce regional air pollutant emissions. The QVHSP encourages non-vehicular transportation and supports pedestrian and bicycle access (Program EIR Sections 4.2, <i>Air Quality</i> , and 4.13, <i>Transportation and Traffic</i>).
G7: Actively encourage and create incentives for energy efficiency, where possible.	Consistent. The QVHSP would encourage energy and other resource conservation, as appropriate, for the expanded hospital facilities (Program EIR Sections 4.6, <i>Greenhouse Gas Emissions</i> , and 4.15, <i>Utilities and Service Systems</i>).
G8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. The Project is consistent with the growth goals and patterns of PlanWC but would provide expanded health care services to the community. PlanWC provides for well-planned transition in land uses and land use patterns, which would facilitate transit and non-motorized transportation (Program EIR Section 4.9, <i>Land Use and Planning</i> , Section 4.13, <i>Transportation and Traffic</i>) including the proposed QVHSP.
G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Not Applicable. The hospital would incrementally reduce regional trips by providing expanded health care services to area residents and making it more accessible and safer by providing such services closer to residents' homes (Program EIR Section 4.13, <i>Transportation and Traffic</i>).
Source: (policies): SCAG 2012 (see SCAG letter in Appendix B of this Program EIR).	

City of West Covina

General Plan

The Project would require an amendment to the General Plan Land Use Map to ensure full consistency of the QVHSP with PlanWC (i.e., the General Plan Amendment would require changes to the General Plan Land Use Map). The Project site is currently designated as “Commercial” and “Parks and Open Spaces”. The QVHSP includes a proposal to amend the General Plan Land Use Map to change the land use designation for the northeastern portion of the Project site from “Parks and Open Spaces” to “Commercial” (see Exhibit 4.9-2, *General Plan Land Use Designations*). With these changes, the proposed Project would be consistent with PlanWC. Table 4.9-2 demonstrates that the proposed Project is consistent with applicable goals, policies, and actions of the General Plan as outlined in the proposed QVHSP.

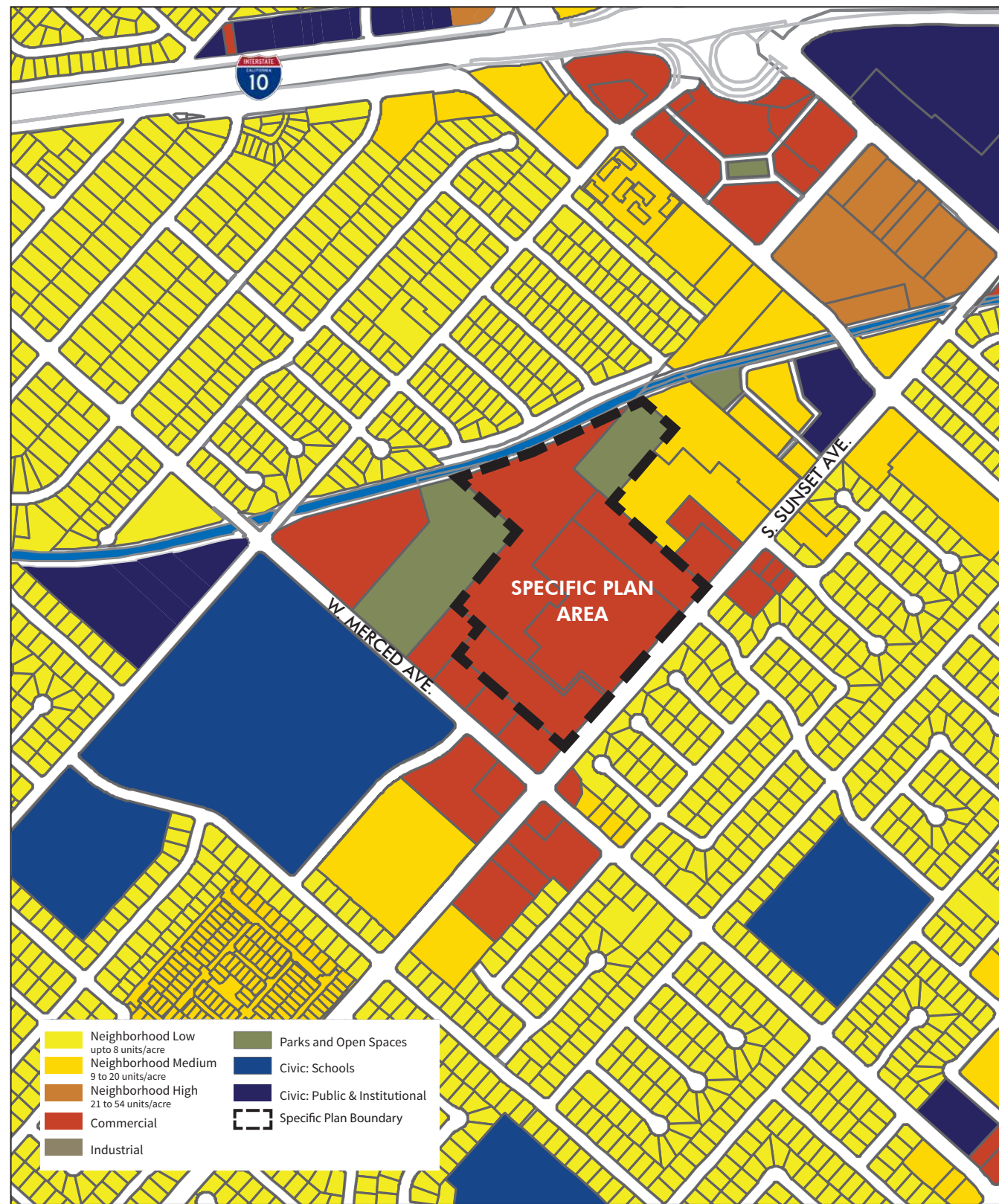
**TABLE 4.9-2
GENERAL PLAN POLICY CONSISTENCY ANALYSIS**

GENERAL PLAN GOAL/POLICY		CONSISTENCY ANALYSIS
GOAL - Our Natural Community		
Policy 1.6	Preserve, conserve, and add to public open space.	Consistent. The City has determined the recreational needs of the City can be better met by converting the Sunset Field property to hospital-related uses and placing the revenue from the sale of the property into the City's in-lieu park fee account to purchase parkland elsewhere in the City.
Action 1.6	Maintain the existing conservation areas and prohibit any development in spaced designated as parks and open space on the land use plan.	
Action 1.6b	Continue to add public open spaces through developer dedication, in-lieu fees, or conservation easement.	
GOAL - Our Well Planned Community		
Policy 2.7	Target employment based uses to downtown. West Covina's employment base as of 2015 is dominated by retail trade, which as an industry, is projected by the Southern California Association of Governments (SCAG) to have relatively slow growth over through 2025. Education, healthcare and professional services, however are expected to have above-average growth, and capturing one or more major employers in these sectors could not only improve the City's economic strength and provide high-quality jobs for residents, but could also anchor one of many key currently underutilized sites in West Covina's downtown, and support the City's fiscal health.	Consistent. The Project would increase health-care related employment at the hospital by approximately 50 percent over 10-15 years. The presence of an expanded community hospital would also increase the potential for the City to attract other medical-related uses to the City.
Action 2.7a	Explore health/medical campus opportunities. Medical-related jobs tend to be higher-paying and the medical industry is expected to be a growing field as the US population continues to age. An additional health/medical campus could support quality employment for residents, but may also be an additional amenity for residents seeking medical care. West Covina already has a significant medical presence. This presence could be leveraged to capture a major medical institution or medical campus. The City can reach out to existing regional and local health care institutions such as Citrus Valley Hospital or Doctor's Hospital to understand their future facility needs and continuum of care services that may be attracted to the area including, physician's offices, specialty practices, rehabilitation centers, assisted living facilities, and nursing facilities.	

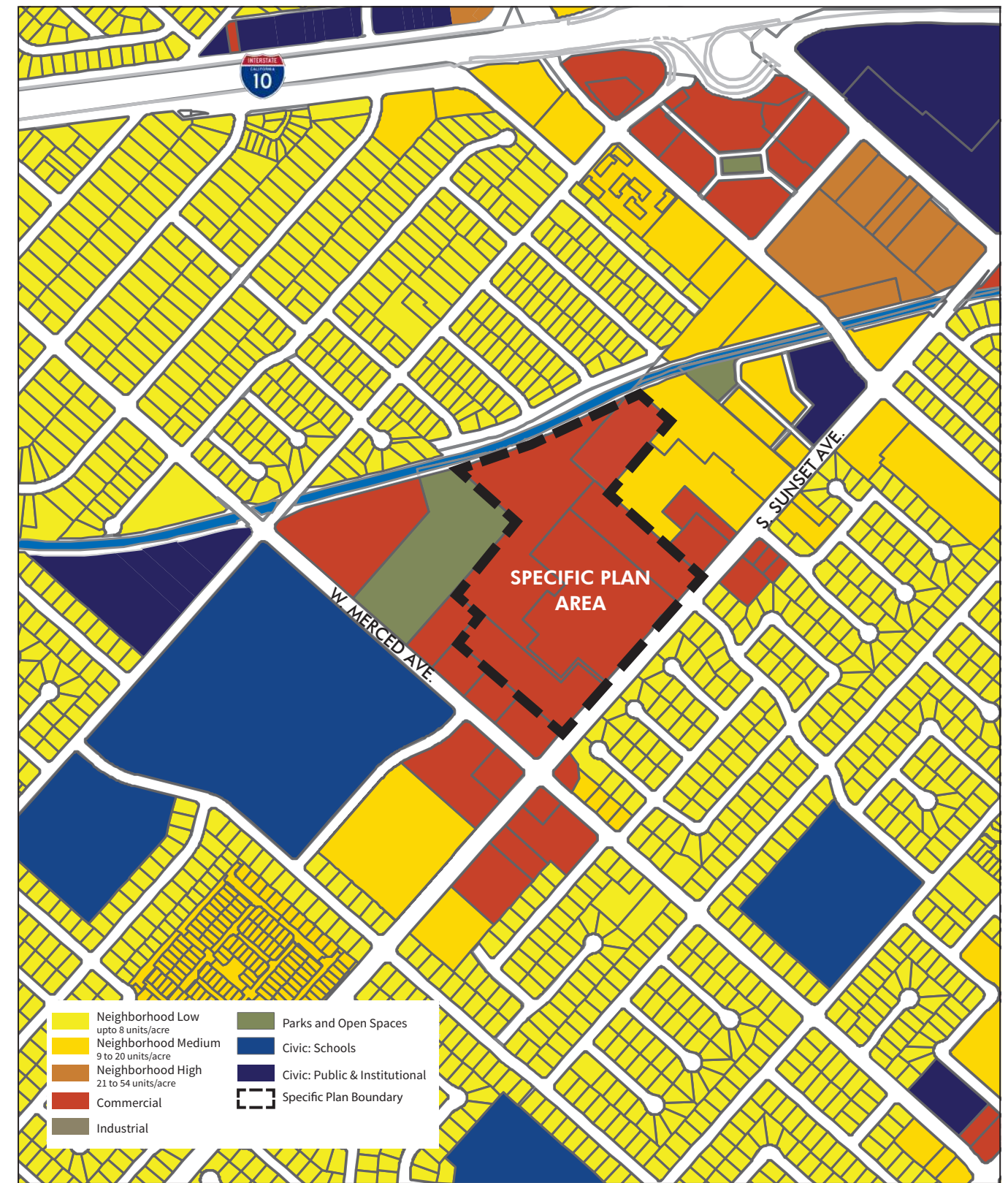
**TABLE 4.9-2
GENERAL PLAN POLICY CONSISTENCY ANALYSIS**

GENERAL PLAN GOAL/POLICY		CONSISTENCY ANALYSIS
Policy 3.5	Support the growth of Queen of the Valley Hospital while developing a unifying vision and code for Sunset Avenue.	Consistent. The QVHSP would allow growth of the hospital under an organized plan that would benefit the Sunset Avenue Corridor over the long-term.
Action 3.5	Partner with Queen of the Valley hospital to develop a Corridor Plan and Development Code for Sunset Avenue that accommodates future hospital growth in a contextual manner with enhancements to Sunset Avenue Corridor.	
Policy 5.10	Consider incorporating community gardens as part of city parks and recreation planning, and work with local schools Hurst Ranch, and Queen of the Valley Hospital to facilitate the development, administration and operation of additional community gardens throughout the city.	Consistent. The QVHSP allows and encourages community-based health programs such as gardens throughout the City.
Corridors	In addition, the QVH site is part of the Sunset Avenue Corridor which ... “is anchored by Queen of the Valley hospital campus and supporting medical uses. Besides meeting the community’s health needs, the hospital provides high-wage high-value jobs. Sunset Avenue has the potential to become a dynamic corridor with growth opportunities for research, medical, and bioscience interests. A Corridor Plan and Code should be developed to provide a unifying vision and precise and clear standards that accommodates hospital growth in a contextual manner respectful of the adjacent residential areas.” (GP page 53).	Consistent. The QVHSP would allow growth of the hospital under an organized plan that would benefit the Sunset Avenue Corridor over the long-term.
GOAL – Our Healthy and Safe Community Recurring themes of GP are physical and mental health, active living, healthy foods, etc. all goals furthered by QVH operations.		
Policy 6.1	Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.	Consistent. Expansion of the hospital would result in an incremental reduction in regional vehicle miles traveled (VMT) by providing more medical services within the local community. The QVHSP encourages transit, walking, and bicycling to and from the hospital for employees.
Policy 6.2	New and renovated buildings should be designed and constructed to improve the health of the residents, workers, and visitors.	Consistent. The QVHSP establishes a clear plan for growth of local medical services on the hospital campus over the next 20 years.
Policy 6.3	Support and partner with health providers to offer active living activities and events.	Consistent. The QVHSP allows for more community-based events and active living activities for local residents.
Action 6.3b	Support health fairs with information, health care screenings and services, and activities celebrating active living. The event should be sponsored by a range of health service partners. The health fair should have a strong focus on active living, healthy eating, and mental health.	
Policy 6.9	Increase awareness about how to prevent mental illness and promote mental health.	Consistent. The expanded hospital would be able to offer more mental health programs and services to local residents.

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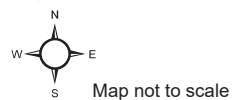
EXISTING



PROPOSED

General Plan Designations

Queen of the Valley Hospital Specific Plan EIR



Source: KTG 2018

Exhibit 4.9-2

City of West Covina Municipal Code/Zoning

Chapter 26 of the West Covina Municipal Code contains land use and development procedures and regulations that identify the permitted land uses on parcels in the City through assigned districts. The Project site is currently designated as “Specific Plan” (SP-1) and “MF-20 - Residential 20 du/ac”, and the QVHSP was originally adopted on April 15, 1987. The proposal includes a completely new Specific Plan document that would supersede the previously adopted and outdated document (see below). The Project proposes to amend the City’s zoning map to change the zoning for the northeastern portion of the Project site from “MF-20 - Residential 20 du/ac” to “Specific Plan” (see Exhibit 4.9-3, *Zoning Designations*). The proposed Project is consistent with the zoning for the Hospital property and, upon approval of the Project, the City will formally approve the conversion of the former Sunset Field site to hospital-related uses under the QVHSP.

Consistency with Surrounding Land Uses

The Hospital property is surrounded by a variety of land uses including residential (apartments) to the northeast, institutional and commercial to the east and southeast, institutional to the west and southwest, and Walnut Creek Wash and single-family residential uses to the north. The apartments that are immediately northeast of the hospital site are considered the most sensitive land uses in terms of visual quality, lighting, shade/shadow, air pollutants, noise, and to a lesser degree parking and traffic circulation.

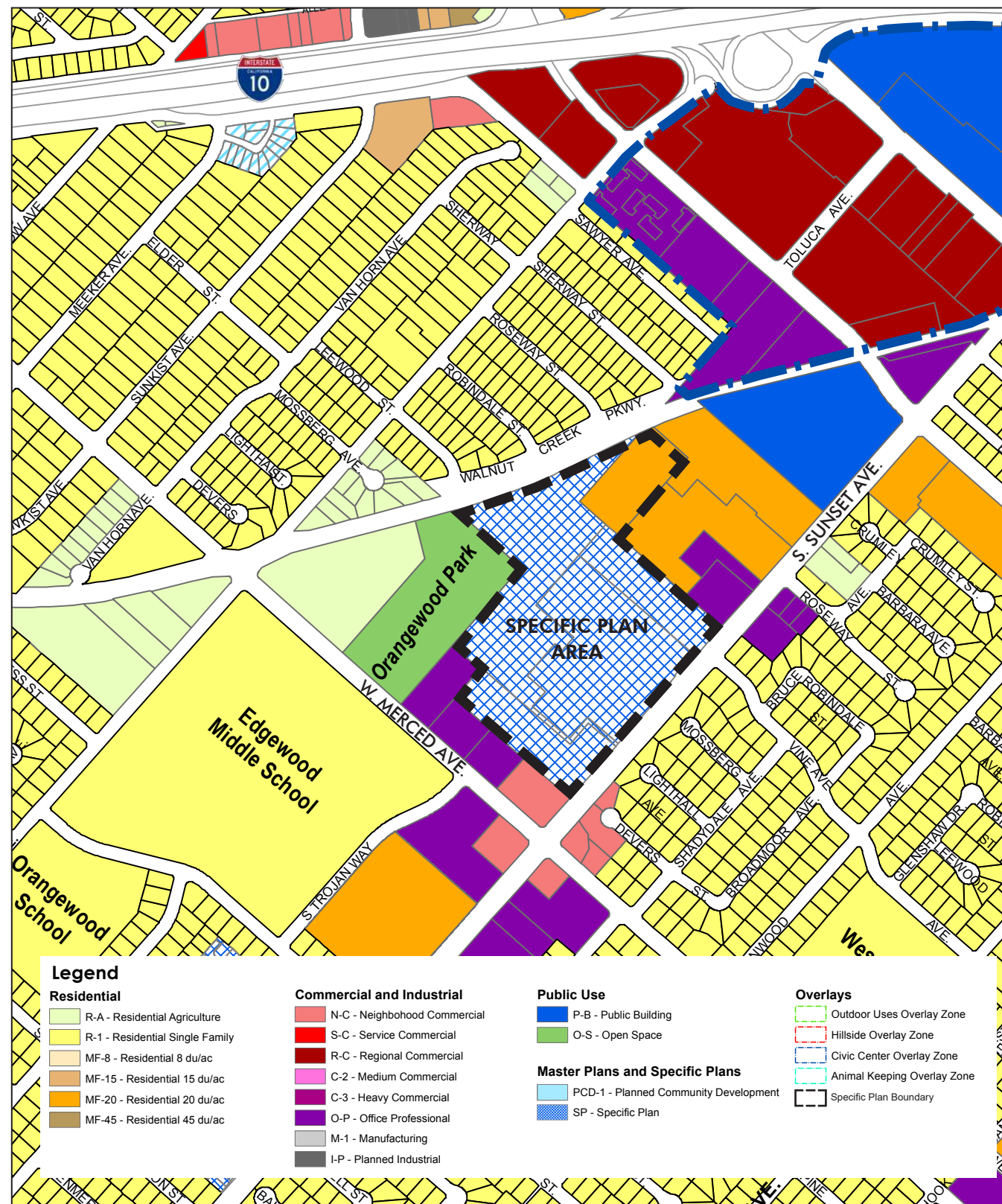
The QVHSP is an entirely new Specific Plan replacing the old Specific Plan. The new QVHSP provides development standards and design guidelines that will provide sufficient separation and buffering (e.g., walls, landscaping) between proposed Hospital-related improvements and existing sensitive uses surrounding the site. Under the new QVHSP, Project-related buildings will be concentrated in the central campus area of the QVHSP (Zone 1) while Zones 2 and 3 will provide less intense uses. The QVHSP requires a 15-foot setback (of which a minimum of 10 feet shall be landscape) to abutting residential and open spaces uses, as well as the Walnut Creek Wash.

Project-related buildings have not been specifically designed or located as yet, so there is a potential for Project-related impacts on local residents related to views, lighting, shade/shadows, air pollution, and noise. This is considered a potentially significant land use impact that requires mitigation.

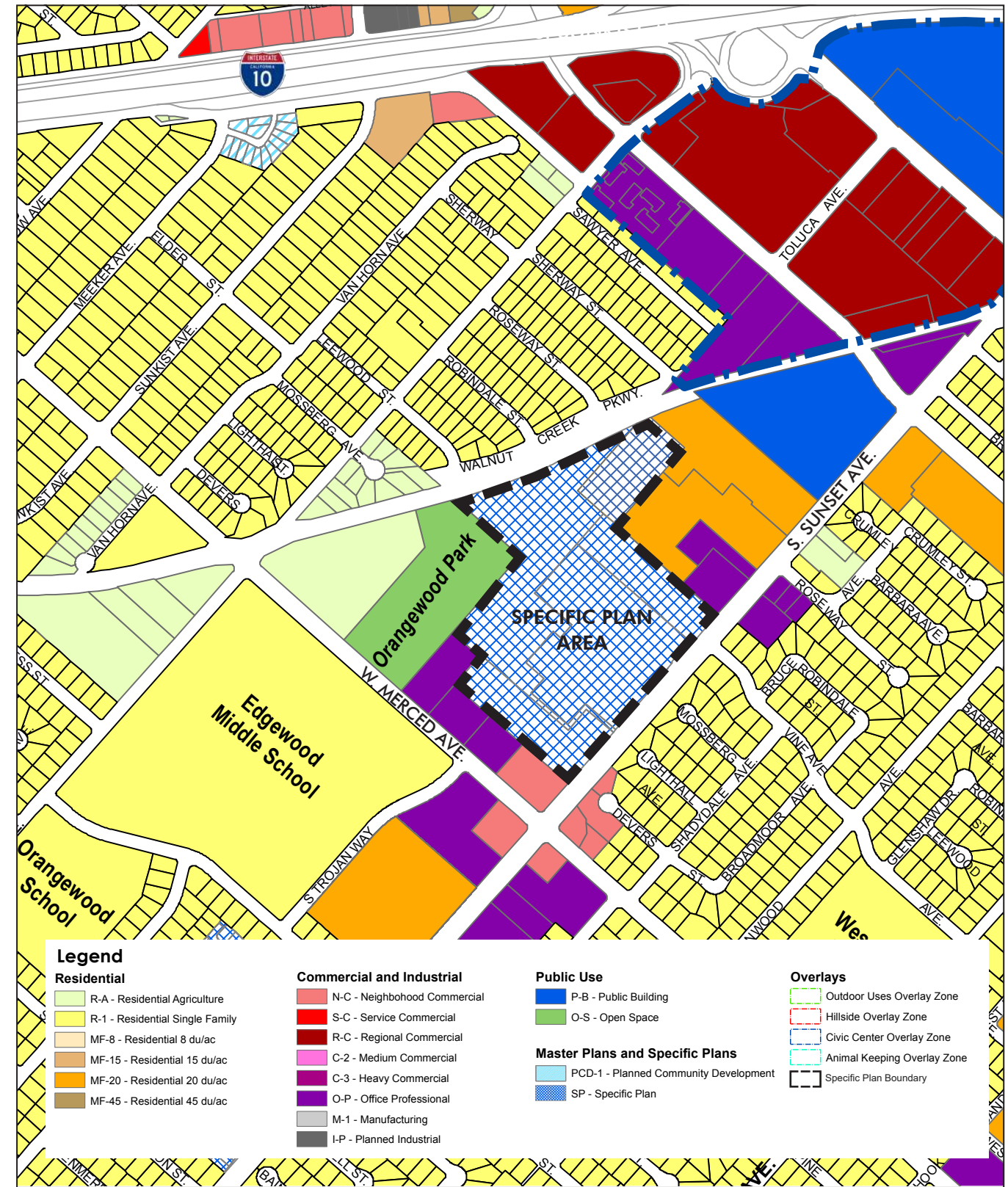
Mitigation Measures

LUP-1 Except for surface parking, any improved uses placed adjacent to the residential uses to the northeast of the QVHSP property, including the former Sunset Field site, shall be located and designed to minimize impacts related to views, lighting, and noise on local residents. In addition to the required noticing for precise plans per the Municipal Code, property owners and residents living northeast of the site (i.e., Torrey Pines Apartment Homes) shall be notified of a public hearing at least 30 days prior to the hearing for any buildings in the portions of Specific Plan Zones 1 or 3, adjacent to these residences. This process is in addition to the Municipal Code’s requirement to hold a public hearing for new buildings and to notify owners and residents within 300 feet of the proposed building of the public hearing. This measure shall be implemented to the satisfaction of the City Community Development Director.

Summary of Impacts. With approval of the General Plan Amendment, Zone Change, and Specific Plan, the proposed Project is consistent with short- and long-range goals, policies, and



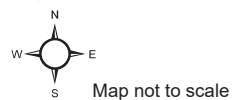
EXISTING



PROPOSED

Zoning Designations

Queen of the Valley Hospital Specific Plan EIR



Source: KTG 2018

Exhibit 4.9-3

actions outlined in PlanWC and is consistent with regional planning goals developed by the SCAG. The design of the Project would also be made compatible with surrounding land uses to the extent feasible. With implementation of Mitigation Measure LUP-1, potential land use or planning impacts of the Project would be less than significant.

Threshold 9.3	Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?
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The proposed Project site is not within any established Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved type of habitat conservation plan. In addition, there are no HCP or NCCP areas within two miles of the Project site. Therefore, the proposed Project would not have any significant impacts in this regard and no mitigation is required.

Summary of Impacts. The proposed Project would not result in any conflicts with habitat conservation plan or natural community conservation plan as none exists in the vicinity of the site.

4.9.6 CUMULATIVE IMPACTS

This cumulative impact analysis considers implementation of the proposed Project in addition to other development in the City in accordance with the General Plan and Zoning, as identified in Section 4.0.4, *Analysis of Cumulative Impacts*, of this Program EIR. As identified in the “Our Prosperous Community” section of PlanWC, vacant land is becoming a scarce resource in the City, and land use decisions must be carefully crafted to protect established residential neighborhoods and plan for appropriate infill development while connecting land uses and transportation modes. These key objectives provide the framework for the City’s land use strategies. The proposed Project would support these strategies by (1) providing a well-balanced mix of urban infill uses in and near the downtown area and transit center (both northeast of the site), (2) providing increased residential density with allowed medium-high and high-density residential uses near existing employment centers; and (3) enhancing travel corridors within the City for both residents and visitors to the City.

As discussed in Section 4.9.5 above, the proposed Project would not result in significant impacts related to land use and planning with implementation of Mitigation Measure LUP-1 regarding adjacent land uses. Implementation of the proposed Project would not divide an established community, and it would be consistent with SCAG’s 2016–2040 RTP/SCS goals and policies. The QVHSP would also be consistent with PlanWC goals and policies and the provisions of the City’s Municipal Code and Zoning.

Similar to the proposed Project, recently approved and future developments in the City of West Covina are required to comply with the adopted land use standards, policies, and ordinances set forth in PlanWC and Municipal Code/Zoning, as applicable.

Cumulative development in accordance with PlanWC and sub-regional growth and development would increase population, housing, and employment in this portion of the San Gabriel Valley. PlanWC includes goals and policies to align growth and development with infrastructure capabilities; requires compliance with State and federal laws and regulations; provides adequate housing; and ensures a complementary balance of land uses while minimizing potential land use conflicts. As required by CEQA, future development projects in the City, as well as those in adjacent jurisdictions, would be required to mitigate land use impacts on a project-by-project basis.

As a result, the proposed Project would not contribute to significant cumulative land use impacts. Potential cumulative impacts for other topical issues (e.g., air quality, noise, aesthetics, and traffic) in terms of compatibility with the existing uses, are discussed in the respective sections of the Program EIR.

4.9.7 IMPACTS OF MITIGATION MEASURES

Implementation of LUP-1 may result in changes to the initial proposed locations, heights, or designs of Project improvements, but no significant land use or planning impacts are expected during its implementation.

4.9.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure LUP-1, potential Project impacts related to land use and planning would be reduced to less than significant levels.

4.9.9 REFERENCES

California Governor's Office of Planning and Research (OPR). 2017. *General Plan Guidelines*. Sacramento, CA: OPR.

Southern California Association of Governments (SCAG). 2016 (April). *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*. Los Angeles: SCAG. <http://rtpscs.scag.ca.gov/Pages/2016-2040-RTP-SCS.aspx>

———. 2008. *Final 2008 Regional Comprehensive Plan: Helping Communities Achieve a Sustainable Future*. Los Angeles, CA: SCAG.

West Covina, City of (City). 2018. *Municipal Code*. Last Adopted January 2018.

———. 2016a. West Covina General Plan (PlanWC). Adopted December 2016.

———. 2016b. *Final Environmental Impact Report, 2016 General Plan Update and Downtown Plan and Code*. Rincon Consultants, Inc. Adopted December 2016.

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4.10 NOISE

This section provides background information on noise and community noise assessment criteria; presents existing noise levels at the Project site; and examines noise impacts that would potentially occur during construction and operation of the proposed Project (i.e., future construction of hospital facilities under the Queen of the Valley Hospital Specific Plan or QVHSP). The following information is based on a technical noise study prepared by Psomas, dated December 27, 2018 (see Appendix G).

There were no Notice of Preparation (NOP) comment letters received related to noise although at the Scoping Meeting several local residents expressed concern about construction noise as well as noise from increased activity, parking, etc. at the expanded hospital.

4.10.1 RELEVANT POLICIES AND REGULATIONS

State

State of California standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. The following State regulation is applicable to the proposed Project.

Residential Interior Noise Standard

Title 24 of the *California Code of Regulations*, also known as the California Building Standards Code, establishes building standards applicable to all occupancies throughout the state. Section 1207.11.2 requires that residential structures other than detached single-family dwellings be designed to prevent the intrusion of exterior noise so that the interior noise attributable to exterior sources shall not exceed 45 A-weighted decibel scale (dBA) Community Noise Equivalent Level (CNEL) in any habitable room. Section 1207.12 states, “if interior allowable noise levels are met by requiring that windows be unopenable or closed, the design for the structure must also specify a ventilation or air-conditioning system to provide a habitable interior requirement. The ventilation system must not compromise the dwelling unit or guest room noise reduction” (CBSC 2015). Although the Hospital Project does not propose any residential uses, there are residential uses immediately adjacent to the Project site to the northeast.

County

If the Hospital eventually adds air ambulance service to the Project, the proposed landing facility would need to be reviewed by the Los Angeles County Department of Regional Planning (LACDRP) as they are responsible for the Airport Land Use Commission (ALUC) coordination within the County. The process for reviewing a helipad outside of an Airport Influence Area (AIA) is different from reviewing one inside of an AIA or in an unincorporated area, since airport operations would not be a factor in terms of analyzing the impacts. The County’s policy is that such a request be processed administratively as Minor Aviation cases, and in an advisory capacity. Emergency-related heliports are usually given the highest consideration over commercial types, and the County tries to ensure the helipad does not generate significant noise impacts on surrounding residential properties, and that it is not located in close proximity to an existing heliport or a nearby airport. In this case, the Queen of the Valley Hospital (QVH) property is not located near an existing airport and is not within an AIA (Stewart 2018).

Local

City of West Covina General Plan

The City of West Covina is affected by several different sources of noise, including automobile traffic, commercial activity, and periodic nuisances such as construction, loud parties, and other events. The Noise Element of the City's General Plan (PlanWC) is intended to identify these sources and provide objectives and policies that ensure that noise from these sources does not create an unacceptable noise environment (City 2016). The section of the PlanWC entitled "Our Healthy and Safe Community", Sub-Section E, comprises the City's "Noise Element" and contains guidelines for noise compatible land uses for long-term operations as shown in Table 4.10-1. The Noise Element acknowledges that noise from major roadways may affect sensitive receptors and identifies roadways proximate to the Project site such as Sunset Avenue and Merced Avenue as major roadways. The following policy and implementation actions are applicable to the proposed Project:

Policy 6.23 Ensure that new development is not exposed to excessive noise.

Action 6.23a Require new developments to reduce exterior noise levels for any usable outdoor area to the "normally acceptable" range in the City's land use/noise compatibility matrix, shown in Table 6.4 of this Noise Element.

Action 6.23b Require mixed-use structures and areas to be designed to prevent transfer or noise from commercial to residential uses, and to ensure a 45 CNEL level or lower for all interior living spaces.

Action 6.23c Require any residential component of all new buildings to comply with the requirements of the residential noise insulations standards of the most recent edition of California's building code.

Policy 6.24 Ensure that new development does not expose surrounding land uses to excessive noise.

Action 6.24 Through the environmental review process, require applicants for new development proposals to analyze potential noise impacts on nearby noise-sensitive receivers before project approval. As feasible, require appropriate noise mitigation to address any identified significant noise impacts.

Policy 6.25 Minimize noise conflicts between local noise generators and sensitive receivers.

Action 6.25a Continue to enforce the City's existing Noise Ordinance.

Action 6.25b Track noise complaints to determine areas of potential problems, and work proactively with the noise generators and the affected parties to reduce the impacts of such noise.

The Noise Element recognizes that construction activity is also a source of occasional temporary nuisance noise throughout the City. "The Noise Ordinance prohibits any construction activities between the hours of 8:00 PM to 7:00 AM (or 6:00 AM for unloading and loading activities) that causes the noise level at the property line to exceed the ambient noise level by more than 5 dB, unless a permit has been obtained, or in the case of emergency work as defined in the Noise Ordinance."

**TABLE 4.10-1
CITY LAND USE/NOISE COMPATIBILITY MATRIX**

Land Use Category	Community Noise Exposure L _{dn} or CNEL, DBA						
	55	60	65	70	75	80	85
Residential – Low density single family, duplex, mobile homes							
Residential – Multi-family							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							
<div></div> Normally Acceptable Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirement.			<div></div> Normally Acceptable If new construction or development proceeds, an analysis of the noise reduction requirements should be made and needed noise insulation features included in the design.				
<div></div> Conditionally Acceptable New construction or development should be undertaken after an analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.			<div></div> Clearly Unacceptable New construction or development should generally not be undertaken, unless it can be demonstrated that an interior level of 45 dBA can be achieved.				
Source: City of West Covina 2016.							

City of West Covina Development Code

The City Municipal Code (Chapter 15, Article IV, Noise Regulations) is the City's Noise Ordinance. It is the City's policy "...in the exercise of its police power, to regulate and control annoying noise levels from all sources. At certain levels noises are detrimental to the health and welfare of the citizenry and in the public interest shall be systematically proscribed." The following sections of the Noise Ordinance are applicable to the proposed Project:

Sec. 15-85 – Loud, unnecessary noise prohibited generally.

Notwithstanding any other provision of this article, it shall be unlawful for any person within any residential zone of the city to willfully make or continue or cause to be made or continued, any loud, unnecessary or unusual noise which unreasonably disturbs the peace and quiet of any residential neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. If the noise which is being created is plainly audible at a distance of fifty (50) feet from the property line of any property (or if a condominium or apartment house, within any adjoining unit or apartment), building, structure or vehicle in which it is located, it shall be presumed that the noise being created is in violation of the provisions of this section.

Sec. 15-94 – Radios, television sets, and similar devices.

Between the hours of 10:00 p.m. on one (1) day and 7:00 a.m. of the following day, it shall be unlawful for any person within any residential zone of the city to use or operate any radio receiving set, musical instrument, phonograph, television set, or other machine or device for the producing or reproducing of sound or any device by which voice, music, or any other sound is amplified, in such a manner as to create any noise which causes the noise level at the property line of any property (or if a condominium or apartment house, within any adjoining unit or apartment), building, structure or vehicle to be plainly audible at a distance of fifty (50) feet therefrom.

Sec. 15-95V – Construction and building projects.

- (a) Regulation. Between the hours of 8:00 p.m. of one day and 7:00 a.m. of the next day, it shall be unlawful for any person within a residential zone, or within a radius of five hundred (500) feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick, steam or electric hoist, or other construction type device in such manner as to create any noise which causes the noise level at the property line to exceed the ambient noise level by more than five (5) decibels unless a permit therefor has been duly obtained in accordance with paragraph (b) of this section. No permit shall be required to perform emergency work as defined in section 15-83 of this article.
- (b) Permit procedure. A permit may be issued authorizing noises prohibited by this section whenever it is found that the public interest will be served thereby. Applications for permits shall be in writing, shall be accompanied by an application fee in the amount of five dollars (\$5.00), and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the building director; provided, however, that, with respect to work upon or involving the use of a public street, alley, building, or other public place under the jurisdiction of the engineering department, applications shall be made to the city engineer. Anyone dissatisfied with the denial of a permit may appeal to the council.

- (c) Unloading and Loading. Between the hours of 8:00 p.m. of one day and 6:00 a.m. of the next day, it shall be unlawful for any person within the radius of five hundred (500) feet of generally occupied residences to unload, load or otherwise perform duties preparatory to the commencement of construction or repair work on buildings or structures. Generally occupied residences shall include, but not be limited to, areas in which there is a reasonable probability of occupancy within the area.

4.10.2 METHODS

The following information is based on a technical noise study prepared by Psomas, dated December 27, 2018 (see Appendix G). Relevant elements of the proposed Project related to the analysis of potential noise impacts include: (1) Project construction activities, which would be staged in five phases: Immediate Improvements (2019), Phase 1A (2020-2022), Phase 1B (2020-2022), Phase 2 (2022-2026), and Long Range Improvements (2028+); (2) noise generated during the operations phase of the Project, which would include noise sources such as stationary sources (e.g., mechanical equipment, landscape maintenance equipment); and (3) the vehicle trips generated by the proposed Project.

Noise and Vibration Basics and Terminology

“Sound” is a vibratory disturbance created by a moving or vibrating source and is capable of being detected. “Noise” is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance; interference with speech communication; sleep disturbance; and, in the extreme, hearing impairment (Caltrans 2013).

Sound pressure levels are described in units called the decibel (dB). Decibels are measured on a logarithmic scale. A doubling of the energy of a noise source (such as doubling of traffic volume) would increase the noise level by 3 dB. The human ear is not equally sensitive to all frequencies within the sound spectrum. To accommodate this phenomenon, the A-scale was devised; the dBA approximates the frequency response of the average healthy ear when listening to most ordinary everyday sounds and is used in this analysis.

Human perception of noise has no simple correlation with acoustical energy. Due to subjective thresholds of tolerance, the annoyance of a given noise source is perceived very differently from person to person. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at 3 feet is approximately 60 dBA, while loud jet engine noises at 1,000 feet equate to 100 dBA, which can cause serious discomfort. Table 4.10-2 shows the relationship of various noise levels in dBA to commonly experienced noise events.

Two noise sources do not “sound twice as loud” as one source. As stated above, a doubling of noise sources results in a noise level increase of 3 dBA. It is widely accepted that (1) the average healthy ear can barely perceive changes of a 3 dBA increase or decrease, (2) a change of 5 dBA is readily perceptible, and (3) an increase (decrease) of 10 dBA sounds twice (half) as loud (Caltrans 2013).

**TABLE 4.10-2
NOISE LEVELS FOR COMMON EVENTS**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet fly-over at 300 m (1,000 ft)	100	
Gas lawn mower at 1 m (3 ft)	90	
Diesel truck at 15 m (50 ft) at 80 km/hr (50 mph)	80	Food blender at 1 m (3 ft); garbage disposal at 1 m (3 ft)
Noisy urban area, daytime gas lawn mower at 30 m (100 ft)	70	Vacuum cleaner at 3 m (10 ft)
Commercial area, heavy traffic at 90 m (300 ft)	60	Normal speech at 1 m (3 ft)
Quiet urban daytime	50	Large business office, dishwasher in next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural nighttime	20	Bedroom at night, concert hall (background)
	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing
dBA: A-weighted decibels; m: meter; ft: feet; km/hr: kilometers per hour; mph: miles per hour Source: Caltrans 2013.		

From the source to the receiver, noise changes both in the level and frequency spectrum. The most obvious change is the decrease in noise level as the distance from the source increases. Sound from a small localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern. For point sources, such as heating, ventilation, and air conditioning (HVAC) units or construction equipment, the sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance (i.e., if the noise level is 70 dBA at 25 feet, it is 64 dBA at 50 feet). Vehicle movement on a road makes the source of the sound appear to emanate from a line (line source) rather than a point when viewed over some time interval. The sound level attenuates or drops off at a rate of 3 dBA per doubling of distance for line sources.

A large object in the path between a noise source and a receiver can significantly attenuate noise levels at that receiver location. The amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain or landform features as well as man-made features (e.g., buildings and walls) can significantly alter noise exposure levels. For a noise barrier to work, it must be high enough and long enough to block the view from the receiver to a road or to the noise source. Effective noise barriers can reduce outdoor noise levels at the receptor by up to 15 dBA.

Several rating scales (or noise “metrics”) exist to analyze effects of noise on a community. These scales include the equivalent noise level (L_{eq}), including maximum noise level (L_{max}) and minimum noise level (L_{min}), which are respectively the highest and lowest A-weighted sound levels that occur during a noise event, and the CNEL. Average noise levels over a period of minutes or hours are usually expressed as dBA L_{eq} , which is the equivalent noise level for that period of time. The period of time averaging may be specified; for example, $L_{eq(3)}$ would be a three-hour average. Noise of short duration (i.e., substantially less than the averaging period) is averaged into ambient noise during the period of interest. Thus, a loud noise lasting many seconds or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period.

To evaluate community noise impacts, CNEL was developed to account for human sensitivity to nighttime noise. CNEL represents the 24-hour average sound level with a penalty for noise occurring at night. The CNEL computation divides a 24-hour day into 3 periods: daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM). The evening sound levels are assigned a 5-dBA penalty, and the nighttime sound levels are assigned a 10-dBA penalty prior to averaging with daytime hourly sound levels.

Noise Survey

Psomas conducted ambient noise surveys for the Project on December 11 and 12, 2018. Noise level measurements were taken using a Larson Davis Laboratories SoundTrack LxT sound level meter (LD LxT) and a Larson Davis Laboratories Model 831 integrating sound level meter (LD 831). These sound level meters were placed at each of the Project's property lines, as shown in Exhibit 4.10-1, *Noise Monitoring Locations*. The LD LxT and LD 831 meters were calibrated before and after use with a Larson Davis Model CAL200 acoustical calibrator to ensure that the measurements would be accurate. The sound level meters were programmed to record noise levels in "slow" mode in A-weighted form. Meteorological conditions during all measurement periods were favorable, with clear skies. The noise level measurements were collected for 24 hours at each location including the energy average (L_{eq}), (L_{max}), and (L_{min}) values taken at each ambient noise measurement location (see Appendix G).

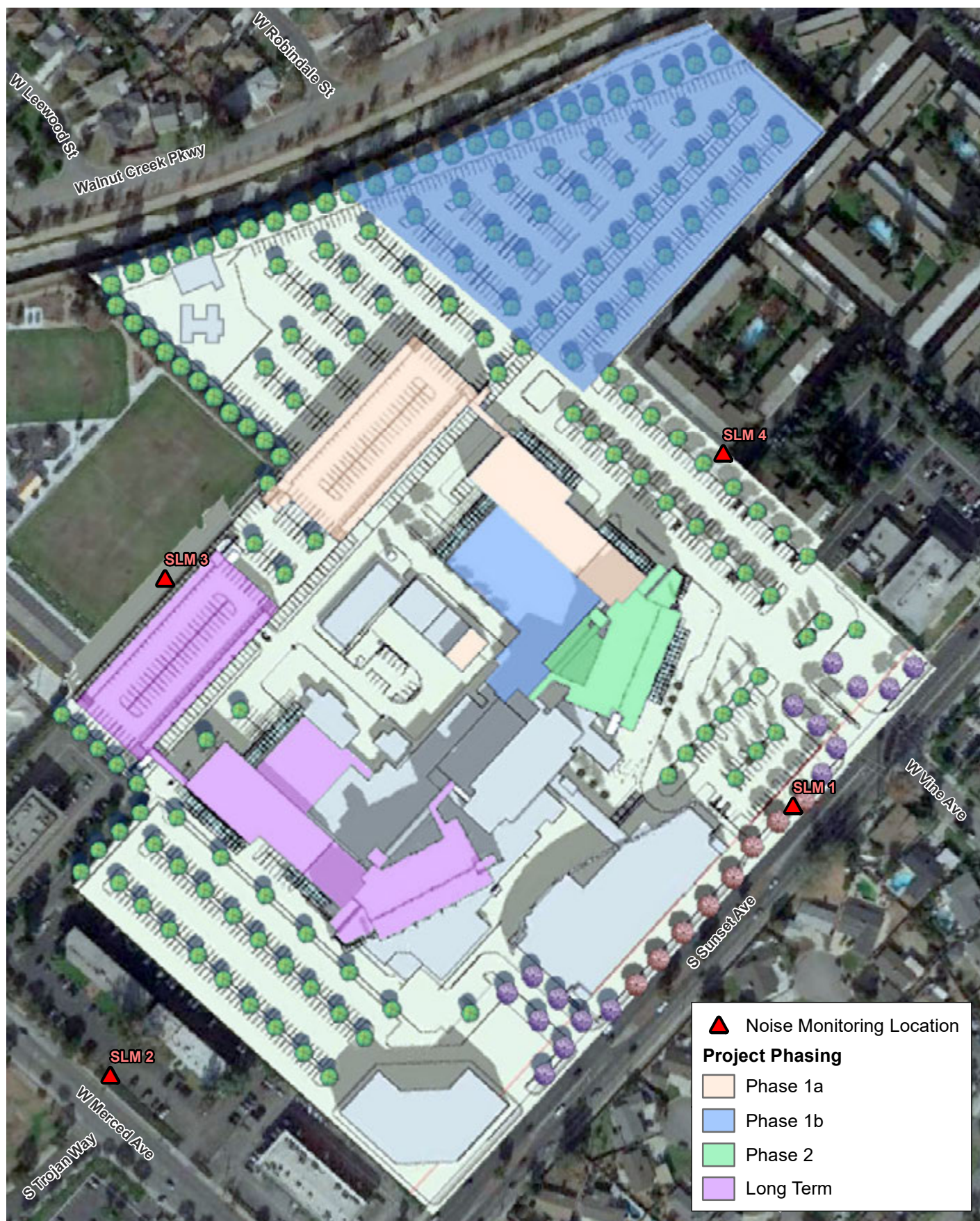
Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration is normally associated with activities such as railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers. Vibration displacement is the distance that a point on a surface moves away from its original static position. The instantaneous speed that a point on a surface moves is described as the velocity, and the rate of change of the speed is described as the acceleration. Each of these descriptors can be used to correlate vibration to human response, building damage, and acceptable equipment vibration levels. During construction of a project, the operation of construction equipment can cause groundborne vibration. During the operational phase of a project, receptors may be subject to levels of vibration that can cause annoyance due to noise generated from vibration of a structure or items within a structure. Analysis of this type of vibration is best measured in velocity and acceleration. The three main wave types of concern in the propagation of groundborne vibrations are surface waves, compression or P-waves, and shear or S-waves.

- Surface waves travel along the ground surface. They carry most of their energy along an expanding cylindrical wave front, similar to the ripples produced by throwing a rock into a lake. The particle motion is more or less perpendicular to the direction of propagation (known as retrograde elliptical).
- Compression or P-waves are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal, in a push-pull motion. P-waves are analogous to airborne sound waves.
- Shear or S-waves are also body waves, carrying their energy along an expanding spherical wave front. Unlike P-waves, however, the particle motion is transverse, or perpendicular to the direction of propagation.

The peak particle velocity (ppv) or the root mean square (rms) velocity is usually used to describe vibration amplitudes. The ppv is defined as the maximum instantaneous peak of the vibration

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Noise Monitoring Locations

Queen of the Valley Hospital Specific Plan EIR

Exhibit 4.10-1



200 100 0 200
Feet

signal and the rms is defined as the square root of the average of the squared amplitude of the signal. The ppv is more appropriate for evaluating potential building damage and also used for evaluating human response.

The units for ppv velocity are normally inches per second (in/sec). Often, vibration is presented and discussed in dB units in order to compress the range of numbers required to describe the vibration. In this study, all ppv velocity levels are in in/sec and all vibration levels are in dB relative to one microinch per second. The threshold of perception is approximately 0.3 ppv. Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration. Even the more persistent Rayleigh waves decrease relatively quickly as they move away from the source of the vibration. Manmade vibration problems are, therefore, usually confined to short distances (500 feet or less) from the source.

Construction generally includes a wide range of activities that can generate groundborne vibration. In general, blasting and demolition of structures generate the highest vibrations. Heavy trucks can also generate groundborne vibrations, which vary depending on vehicle type, weight, and pavement conditions. Potholes, pavement joints, discontinuities, differential settlement of pavement, and other anomalies all increase the vibration levels from vehicles passing over a road surface. Construction vibration is normally of greater concern than vibration of normal traffic on streets and freeways with smooth pavement conditions. Trains generate substantial quantities of vibration due to their engines, steel wheels, and heavy loads.

4.10.3 EXISTING SETTING

The existing noise environment in the Project area is influenced by traffic noise on nearby roads. The Project site is located at the intersection of South Sunset Avenue and West Merced Avenue. South Sunset Avenue is a roadway that runs northeast/southwest with two lanes in each direction. Current traffic volumes are estimated to be approximately 24,000 trips per day. West Merced Avenue runs northwest/southeast with two lanes in each direction. Current traffic volumes are estimated to be approximately 14,000 trips per day. For the purpose of this noise analysis, the study area includes the Project site; the areas immediately adjacent to the Project site; and the land uses adjacent to the roadway segments where the Project adds vehicular trips to the roadway system.

Sensitive Receptors

The State of California defines noise-sensitive receptors as those land uses that require serenity or are otherwise adversely affected by noise events or conditions. Schools, libraries, churches, hospitals, and residential uses make up the majority of these areas. Noise-sensitive receptors closest to the Project site include multi-family residences surrounding the Project site in addition to the Edgewood High School located to the south of the Project site. The following describes the average and 24-hour weighted noise levels at the four Project noise monitoring locations shown in Exhibit 4.10-1.

South Sunset Avenue adjacent to the Project site. The average daytime noise levels range from 58 to 71 dBA L_{eq} , while the 24-hour weighted noise level at this location is 70 dBA CNEL. The measured noise levels are representative of being next to a busy roadway arterial.

West Merced Avenue adjacent to the Project site. Average daytime noise levels range from 53 to 68 dBA L_{eq} , while the 24-hour weighted noise level at this location is 67 dBA CNEL.

Project Site adjacent to Orangewood Park. Average daytime noise levels range from 53 to 63 dBA L_{eq} , and the 24-hour weighted noise level at this location is 65 dBA CNEL.

Adjacent to Torrey Pines Apartment Homes. Average daytime noise levels in the study area range from 52 to 66 dBA L_{eq} , and the 24-hour weighted noise level at this location is 63.8 dBA CNEL.

4.10.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to noise if it would.

- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- Would the project expose persons to or generation of excessive groundborne vibration or groundborne noise levels.
- 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.
- Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- 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?
- 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?

4.10.5 ENVIRONMENTAL IMPACTS

Threshold 10.1	Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
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Exterior Noise

The City of West Covina noise and land use/noise compatibility standards are presented in the PlanWC Noise Element. These noise standards provide a basis to control and abate environmental noise and protect citizens from excessive exposure. The Noise Element includes the noise compatibility guidelines from the State General Plan Guidelines, as shown in Table 4.10-1 above. These guidelines are used to evaluate the proposed Project's compatibility with the ambient noise level.

As previously described, the existing noise level on the Project site is estimated at 64 to 70 dBA CNEL at all the noise monitoring locations. These locations were selected and measurements taken at the Project site's property lines. The proposed Project structures would be located approximately 300 to 400 feet away from South Sunset Avenue and West Merced Avenue. Noise levels would attenuate to levels below 65 dBA CNEL at Project structures as a result of noise attenuation due to distance; 65 dBA CNEL would be in the Normally Acceptable range for land use compatibility of hospital and 75 dBA CNEL for office land uses (Table 4.10-2). As such, there

would be a less than significant impact associated with noise compatibility for the proposed Project, and no mitigation is required.

Interior Noise

Title 24 of the *California Code of Regulations*, also known as the California Building Standards Code, establishes building standards applicable to all occupancies throughout the state. Section 1207.11.2 requires that habitable structures be designed to prevent the intrusion of exterior noise so that the interior noise attributable to exterior sources would not exceed 45 dBA CNEL in any habitable room. Section 1207.12 states, “if interior allowable noise levels are met by requiring that windows be unopenable or closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior requirement. The ventilation system must not compromise the dwelling unit or guest room noise reduction”. The interior noise exposure is the difference between the projected exterior noise exposure at the building facade and the noise reduction of the structure. Exterior noise levels were measured and calculated at 65 dBA CNEL on the western property line. Noise levels are attenuated by a minimum of 24 dBA from exterior to interior conditions with windows closed. A 24-dBA reduction from the 65-dBA CNEL exterior noise levels would result in a maximum of 41 dBA CNEL interior noise level, which is below the California interior noise standard of 45 dBA CNEL. Impacts would be less than significant, and no mitigation measures are required.

Summary of Impacts. The proposed Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels, therefore it would have less than significant impacts related to exterior and interior noise, and no mitigation is required.

Threshold 10.2	Would the project expose persons to or generation of excessive groundborne vibration or groundborne noise levels?
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The proposed Project would not generate or expose persons or structures to excessive groundborne vibration from the construction. There are no applicable City standards for vibration-induced annoyance or structural damage from vibration. The California Department of Transportation (Caltrans) vibration damage potential guideline thresholds are shown in Table 4.10-3.

**TABLE 4.10-3
VIBRATION DAMAGE THRESHOLD CRITERIA**

Building Class	Continuous Source PPV (in/sec)	Single-Event Source PPV (in/sec)
Class I: buildings in steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment	0.5	1.2
Class II: buildings with foundation walls and floors in concrete, walls in concrete or masonry, stone masonry retaining walls, underground chambers and tunnels with masonry alignments, conduits in loose material	0.3	0.7
Class III: buildings as mentioned above but with wooden ceilings and walls in masonry	0.2	0.5
Class IV: construction very sensitive to vibrations; objects of historic interest	0.12	0.3
in/sec: inch per second; PPV: peak particle velocity Source: Caltrans 2013.		

The structural damage threshold for “Class I Buildings” of 0.5 peak particle velocity (ppv) inch per second (in/sec) is selected for analysis. This threshold represents the vibration limits for structural damage to adjacent uses to the Project site from continuous sources of vibration.

The Caltrans vibration annoyance potential guideline thresholds are shown in Table 4.10-4. Based on the guidance in Table 4.10-4, the “strongly perceptible” vibration level of 0.9 ppv in/sec is considered as a threshold for a potentially significant vibration impact for human annoyance.

**TABLE 4.10-4
CALTRANS VIBRATION ANNOYANCE CRITERIA**

Average Human Response	ppv (in/sec)
Severe	2.0
Strongly perceptible	0.9
Distinctly perceptible	0.24
Barely perceptible	0.035
ppv: peak particle velocity; in/sec: inch(es) per second Source: Caltrans 2013.	

Pile driving and blasting are generally the sources of the most severe vibration during construction. Neither pile driving nor blasting would be used during Project construction. Conventional construction equipment would be used for demolition and grading activities. Table 4.10-5 summarizes typical vibration levels measured during construction activities for various vibration-inducing pieces of equipment. Demolition, grading, and construction would occur up to the property lines and, as noted above, some land uses are relatively close to the property lines.

**TABLE 4.10-5
VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT**

Equipment		ppv at 25 ft (in/sec)
Pile driver (impact)	upper range	1.518
	typical	0.644
Pile driver (sonic)	upper range	0.734
	typical	0.170
Vibratory roller		0.210
Large bulldozer		0.089
Caisson drilling		0.089
Loaded trucks		0.076
Jackhammer		0.035
Small bulldozer		0.003
ppv: peak particle velocity; ft: feet; in/sec: inches per second. Source: Caltrans 2013; FTA 2006.		

Table 4.10-6, *Phase 1A Vibration Impacts at Sensitive Uses*, shows the vibration levels from construction-generated vibration activities proposed at the Project site. Construction of Phase 1A improvements would generally occur on the northern portion of the Project site. Vibration impacts are assessed at the nearest building structures. As shown in Table 4.10-6, the ppv relative to

uses proximate to the Project site are substantially below both the annoyance and structural damage criteria.

**TABLE 4.10-6
PHASE 1A VIBRATION IMPACTS AT SENSITIVE USES**

Equipment	Vibration Levels (ppv)			
	Receptors to the Northwest - Orangewood Park	Residents to the Northeast – Multifamily Residential (Torrey Pines)	Receptors to the Southeast – Single Family Residential Uses	Receptors to the Southwest – Edgewood High School
	(ppv @ 460 ft)	(ppv @ 207 ft)	(ppv @ 504 ft)	(ppv @ 980 ft)
Large bulldozer	0.001	0.004	0.001	0.000
Small bulldozer	0.000	0.000	0.000	0.000
Jackhammer	0.000	0.001	0.000	0.000
Loaded trucks	0.001	0.003	0.001	0.000
Annoyance Criteria	0.9	0.9	0.9	0.9
Structural Damage Criteria	0.5	0.5	0.5	0.5
Exceeds Criteria?	No	No	No	No
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet				
Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR).				

As shown in Table 4.10-6, ppv would not exceed the criteria threshold when construction activities occur under maximum (i.e., closest to the receptor) exposure conditions. These vibration levels represent conditions when construction activities occur closest to receptor locations. Construction-related vibration would be substantially less under average conditions when construction activities are located further away.

Table 4.10-7 shows vibration levels associated with the development of Phase 1B of the Project. Areas that would be developed under Phase 1B are located to the north and at the center of the Project site. As shown in Table 4.10-7, vibration levels would be less than the annoyance and structural damage significance thresholds.

**TABLE 4.10-7
PHASE 1B VIBRATION IMPACTS AT SENSITIVE USES**

Equipment	Vibration Levels (ppv)			
	Receptors to the Northwest - Orangewood Park	Residents to the Northeast – Multifamily Residential (Torrey Pines)	Receptors to the Southeast – Single Family Residential Uses	Receptors to the Southwest – Edgewood High School
	(ppv @ 160 ft)	(ppv @ 35 ft)	(ppv @ 510 ft)	(ppv @ 960 ft)
Large bulldozer	0.005	0.054	0.001	0.000
Small bulldozer	0.000	0.002	0.000	0.000
Jackhammer	0.002	0.021	0.000	0.000
Loaded trucks	0.005	0.046	0.001	0.000
Annoyance Criteria	0.9	0.9	0.9	0.9
Structural Damage Criteria	0.5	0.5	0.5	0.5
Exceeds Criteria?	No	No	No	No
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR).				

Table 4.10-8 shows vibration levels associated with the development of Phase 2 of the Project, located near the eastern portion of the Project site. As shown in Table 4.10-8, vibration levels would be less than the annoyance and structural damage significance thresholds.

**TABLE 4.10-8
PHASE 2 VIBRATION IMPACTS AT SENSITIVE USES**

Equipment	Vibration Levels (ppv)			
	Receptors to the Northwest - Orangewood Park	Residents to the Northeast – Multifamily Residential (Torrey Pines)	Receptors to the Southeast – Single Family Residential Uses	Receptors to the Southwest – Edgewood High School
	(ppv @ 908 ft)	(ppv @ 185 ft)	(ppv @ 350 ft)	(ppv @ 990 ft)
Large bulldozer	0.000	0.004	0.002	0.000
Small bulldozer	0.000	0.000	0.000	0.000
Jackhammer	0.000	0.002	0.001	0.000
Loaded trucks	0.000	0.004	0.001	0.000
Annoyance Criteria	0.9	0.9	0.9	0.9
Structural Damage Criteria	0.5	0.5	0.5	0.5
Exceeds Criteria?	No	No	No	No
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR).				

Table 4.10-9 shows vibration levels associated with the development of the Long-Term Phase of improvements for the Project. Potential impacts of these improvements would generally occur to the west and south of the Project site. As shown in Table 4.10-9, vibration levels would be less than the annoyance and structural damage significance thresholds.

**TABLE 4.10-9
LONG-TERM PHASE VIBRATION IMPACTS AT SENSITIVE USES**

Equipment	Vibration Levels (ppv)			
	Receptors to the Northwest – Hockey Rink	Residents to the Northeast – Multifamily Residential (Torrey Pines)	Receptors to the Southeast – Single Family Residential Uses	Receptors to the Southwest – Edgewood High School
	(ppv @ 90 ft)	(ppv @ 615 ft)	(ppv @ 360 ft)	(ppv @ 530 ft)
Large bulldozer	0.013	0.001	0.002	0.001
Small bulldozer	0.000	0.000	0.000	0.000
Jackhammer	0.005	0.000	0.001	0.000
Loaded trucks	0.011	0.001	0.001	0.001
Annoyance Criteria	0.9	0.9	0.9	0.9
Structural Damage Criteria	0.5	0.5	0.5	0.5
Exceeds Criteria?	No	No	No	No
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet				
Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR).				

As shown in Tables 4.10-6 through 4.10-9, all Project-related vibration levels would be below the annoyance and structural damage thresholds at nearby offsite structures. This is due to the distance between the Project construction activities and offsite building structures. As such, impacts related to the potential for cosmetic structural damage and annoyance would be less than significant, and no mitigation is required.

Threshold 10.3	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?
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The analysis in this section is divided into Noise Generated by Project Traffic and Noise Generated by Onsite Sources.

Offsite Noise Generated by Project Traffic

Operation of the proposed Project would generate traffic along roadways in the Project vicinity. The Project is anticipated to generate an additional 9,587 trips per day with 776 AM peak-hour trips and 924 PM peak-hour trips (Psomas 2018). Table 4.10-10, *Project-Related Offsite Traffic Noise Increases*, shows that the corresponding increase in offsite traffic noise would range from 0.0 to 0.5 dBA for the analyzed roadway segments. The west segment of the intersection of Vine Avenue and Sunset Avenue would result in an increase in noise levels of 3.6 dBA CNEL. This roadway segment provides parking lot access to the Project site and is not located proximate to offsite noise sensitive land uses. All other roadways would experience noise level increases that are less than 1 dB, which would not be perceptible or substantial. The impact on traffic noise levels would therefore be less than significant, and no mitigation is required.

**TABLE 4.10-10
PROJECT-RELATED OFFSITE TRAFFIC NOISE INCREASES**

Intersection	Segment	CNEL at 100 feet from roadway centerline (dBA)			
		No Project	With Project	Project Contribution	Potential Impact?
Francisquito Ave/Sunset Ave	East Segment	70.3	70.3	0.0	No
	West Segment	70.4	70.4	0.0	No
	North Segment	71.4	71.4	0.1	No
	South Segment	71.4	71.5	0.1	No
Durness St/Sunset Ave	East Segment	58.6	58.6	0.0	No
	West Segment	61.5	61.5	0.0	No
	North Segment	71.4	71.5	0.1	No
	South Segment	71.5	71.5	0.1	No
Merced Ave/Sunset Ave	East Segment	69.4	69.6	0.2	No
	West Segment	69.2	69.2	0.1	No
	North Segment	71.8	71.9	0.1	No
	South Segment	71.6	71.6	0.1	No
Vine Ave/Sunset Ave	East Segment	57.6	57.6	0.0	No
	West Segment	60.0	63.5	3.6	No
	North Segment	72.0	72.4	0.4	No
	South Segment	71.7	71.9	0.1	No
Cameron Ave/Sunset Ave	East Segment	69.8	69.9	0.1	No
	West Segment	70.2	70.3	0.2	No
	North Segment	71.1	71.5	0.3	No
	South Segment	71.8	72.3	0.4	No
West Covina Pkwy/Sunset Ave	East Segment	68.4	68.4	0.0	No
	West Segment	68.5	68.8	0.4	No
	North Segment	71.2	71.2	0.1	No
	South Segment	71.2	71.5	0.3	No
I-10 EB Ramps/Dalewood St	East Segment	4.8	4.8	0.0	No
	West Segment	64.8	64.9	0.2	No
	North Segment	68.8	69.0	0.2	No
	South Segment	69.8	69.8	0.0	No
Merced Ave/Dalewood St/Garvey Ave	East Segment	67.8	68.1	0.3	No
	West Segment	4.8	4.8	0.0	No
	North Segment	62.4	62.4	0.0	No
	South Segment	68.8	69.0	0.2	No
Merced Ave/Orange Ave	East Segment	68.8	68.9	0.2	No
	West Segment	67.8	68.0	0.2	No
	North Segment	67.5	67.5	0.0	No
	South Segment	67.3	67.3	0.0	No
Merced Ave/California Ave	East Segment	69.0	69.2	0.2	No
	West Segment	69.0	69.2	0.2	No
	North Segment	64.0	64.0	0.0	No
	South Segment	63.8	63.8	0.0	No
Merced Ave/Glendora Ave	East Segment	68.5	68.6	0.1	No
	West Segment	69.0	69.2	0.2	No
	North Segment	71.1	71.1	0.0	No
	South Segment	71.0	71.0	0.1	No

**TABLE 4.10-10
PROJECT-RELATED OFFSITE TRAFFIC NOISE INCREASES**

Intersection	Segment	CNEL at 100 feet from roadway centerline (dBA)			
		No Project	With Project	Project Contribution	Potential Impact?
Cameron Ave/Orange Ave	East Segment	70.8	70.8	0.1	No
	West Segment	70.4	70.5	0.0	No
	North Segment	60.9	61.4	0.5	No
	South Segment	68.5	68.5	0.0	No
Cameron Ave/Toluca Ave	East Segment	70.1	70.3	0.2	No
	West Segment	70.8	70.9	0.1	No
	North Segment	63.5	63.8	0.2	No
	South Segment	45.3	45.3	0.0	No
West Covina Pkwy/I-10 WB Ramps	East Segment	69.8	70.1	0.3	No
	West Segment	69.2	69.2	0.0	No
	North Segment	62.6	62.6	0.0	No
	South Segment	66.9	67.2	0.3	No
West Covina Pkwy/I-10 EB Ramps	East Segment	68.8	69.2	0.4	No
	West Segment	69.8	70.1	0.3	No
	North Segment	60.3	60.3	0.0	No
	South Segment	64.6	64.8	0.2	No
West Covina Pkwy/Toluca Ave	East Segment	68.2	68.6	0.4	No
	West Segment	68.7	69.1	0.4	No
	North Segment	4.8	4.8	0.0	No
	South Segment	63.9	64.1	0.2	No
Ave: Avenue; Pkwy: Parkway; I-: Interstate; St: Street; WB: westbound; CNEL: community noise equivalency level; dBA: A-weighted decibels.					
Source: Table 10, <i>Noise and Vibration Analysis</i> , Psomas 2018.					

Onsite Sources

Operational noise sources associated with the proposed Project would include, but are not limited to, mechanical equipment (e.g., HVAC units); landscape maintenance equipment; vehicles on the local internal roadway; and typical residential activities. The City of West Covina's Noise Ordinance is designed to control unnecessary, excessive, and annoying sounds from sources on private property by specifying noise levels that cannot be exceeded. Section 15-85 – Loud, unnecessary noises prohibited generally defines the noise limits at residential uses. HVAC units and other stationary equipment would be selected and installed to comply with the City of West Covina's Noise Ordinance. Because HVAC units are potentially continuous sources that may operate at night, the applicable Noise Ordinance requires that noise associated with the HVAC units not be plainly audible at a distance of 50 feet from the property line. Compliance with the City's Noise Ordinance would minimize these impacts to less than significant levels.

Noise from landscape maintenance, vehicles, and hospital/medical office activities would be similar to noise currently occurring in existing residential neighborhoods. Noise from landscaping activities are specifically addressed under municipal code section 15-97 – Restrictions on the operation of two- and four-stroke engines. Compliance with the noise limits for landscaping would result in less than significant noise impacts. The Project does not include the development of a helipad. If a helipad is proposed at a future date, potential noise impacts would be addressed per

public disclosure requirements under the CEQA. Noise impacts from stationary sources would be less than significant, and no mitigation is required.

Summary of Impacts. The preceding analyses determined that Project noise would not exceed established thresholds relative to offsite noise generated by onsite traffic as well as onsite noise from future onsite sources. Therefore, noise impacts in this regard are less than significant and, no mitigation is required.

Threshold 10.4	Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
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Construction Noise

The development of the proposed Project would entail construction activities, which include noise generated from demolition, grading/excavation, and building construction activities. Local residents would be subject to elevated noise levels due to the operation of Project-related construction equipment. Construction activities are carried out in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise levels surrounding the construction site as work progresses. Construction noise levels reported in the U.S. Environmental Protection Agency's (USEPA's) *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* were used to estimate future construction noise levels for the Project (USEPA 1971). Typically, the estimated construction noise levels are governed primarily by equipment that produces the highest noise levels. Construction noise levels for each generalized construction phase (ground-clearing/demolition, excavation, foundation construction, building construction, paving, and site cleanup) are based on a typical construction equipment mix for an industrial project and do not include use of atypical, very loud, and vibration-intensive equipment (e.g., pile drivers).

The degree to which noise-sensitive receptors are affected by construction activities depends heavily on their proximity. Estimated noise levels attributable to the development of the proposed Project are shown in Tables 4.10-11 through 4.10-14 for each of the Project phases, and calculations are included in Appendix G (*Attachment B, Noise Calculations*).

**TABLE 4.10-11
PHASE 1A CONSTRUCTION NOISE IMPACTS AT SENSITIVE USES**

Equipment	Construction Noise Levels (dBA L _{eq})							
	Receptors to the Northwest – Orangewood Park		Residents to the Northeast – Multifamily Residential (Torrey Pines)		Receptors to the Southeast – Single Family Residential Uses		Receptors to the Southwest – Edgewood High School	
	Max (25 ft)	Avg (310 ft)	Max (160 ft)	Avg (220 ft)	Max (900 ft)	Avg (1070 ft)	Max (417 ft)	Avg (440 ft)
Ground Clearing/Demolition	90	68	74	71	64	61	59	57
Excavation (Site Preparation)	95	73	79	76	69	66	64	62
Foundation Construction	84	62	68	65	58	55	53	51
Building Construction	93	71	77	74	67	64	62	60
Paving	95	73	79	76	69	66	64	62
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR,).								

**TABLE 4.10-12
PHASE 1B CONSTRUCTION NOISE IMPACTS AT SENSITIVE USES**

Equipment	Construction Noise Levels (dBA L _{eq})							
	Receptors to the Northwest – Orangewood Park		Residents to the Northeast – Multifamily Residential (Torrey Pines)		Receptors to the Southeast – Single Family Residential Uses		Receptors to the Southwest – Edgewood High School	
	Max (170 ft)	Avg (600 ft)	Max (25 ft)	Avg (200 ft)	Max (880 ft)	Avg (1400 ft)	Max (417 ft)	Avg (440 ft)
Ground Clearing/Demolition	90	68	74	71	64	61	59	57
Excavation (Site Preparation)	73	62	90	72	64	60	59	55
Foundation Construction	78	67	95	77	69	65	64	60
Building Construction	67	56	84	66	58	54	53	49
Paving	76	65	93	75	67	63	62	58
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR,).								

**TABLE 4.10-13
PHASE 2 CONSTRUCTION NOISE IMPACTS AT SENSITIVE USES**

Equipment	Construction Noise Levels (dBA L _{eq})							
	Northwest – Orangewood Park		Northeast – Multifamily Residential (Torrey Pines)		Southeast – Single Family Residential Uses Along Sunset Avenue		Southwest – Edgewood High School	
	Max (515 ft)	Avg (580 ft)	Max (175 ft)	Avg (335 ft)	Max (950 ft)	Avg (1045 ft)	Max (417 ft)	Avg (440 ft)
Ground Clearing/Demolition	90	68	74	71	64	61	59	57
Excavation (Site Preparation)	64	63	73	67	67	65	58	58
Foundation Construction	69	68	78	72	72	70	63	63
Building Construction	58	57	67	61	61	59	52	52
Paving	67	66	76	70	70	68	61	61
ppv: peak particle velocity; Max: maximum; avg: average; ft: feet Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR.).								

**TABLE 4.10-14
LONG-TERM PHASE CONSTRUCTION NOISE LEVELS AT NOISE-SENSITIVE USES**

Construction Phase	Noise Levels (L _{eq} dBA)							
	Northwest - Orangewood Park		Northeast - Multifamily Residential (Torrey Pines)		Southeast - Single Family Residential Uses Along Sunset Avenue		Southwest - Edgewood High School	
	Max (25 ft)	Avg (350 ft)	Max (635 ft)	Avg (800 ft)	Max (480 ft)	Avg (600 ft)	Max (417 ft)	Avg (440 ft)
Ground Clearing/Demolition								
Excavation	90	67	62	60	67	61	64	62
Foundation Construction	95	72	67	65	72	66	69	67
Building Construction	84	61	56	54	61	55	58	56
Paving and Site Cleanup	93	70	65	63	70	64	67	65
L _{eq} dBA: Average noise energy level; Max: maximum; avg: average; ft: feet Note: Noise levels from construction activities do not take into account attenuation provided by intervening structures. Source: USEPA 1971 (Calculations can be found in Attachment B of Appendix G of this Program EIR.).								

Tables 4.10-11 through 4.10-14 show both the maximum and average noise levels for construction equipment. Maximum noise levels represent the noise levels from construction equipment occurring nearest to the noise-sensitive use/receptor. Average noise levels represent the noise exposure to sensitive uses based on the distance to the center of the Project site. Because truck trips needed for export of the excavated soils and demolition debris at the Project site would occur over the construction period, it is anticipated that an average of 70 truck trips would be distributed over the course of the day. Noise level increases associated with construction-related truck trips are not anticipated to result in an audible (+5 dBA) change in noise

levels due to the relatively small number of truck trips compared to existing traffic volumes. This noise impact would be less than significant due to the limited duration of occurrence and because construction traffic would be limited to the allowed hours of construction activity.

Noise from construction activities on site would intermittently exceed the ambient noise level by more than 5 dBA. The Project would comply with the requirements established under Municipal Code Section 15-95 – Construction and Building Projects. This would require that Project construction activities be limited to the least noise-sensitive portions of the day and obtain a construction permit. Project construction activities would also affect existing hospital and office uses generally to a greater degree than offsite uses. As such, the Hospital has a vested interest in minimizing noise generation.

Summary of Impacts. The preceding analysis demonstrates that Project-related construction would not result in significant impacts, and no mitigation is required.

Threshold 10.5	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?
Threshold 10.6	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?

The Project site is located approximately 7 miles northwest of the El Monte Municipal Airport. The Project site is also located well outside the existing and projected 65-dBA CNEL noise contour, which would occur within 2 miles of an airport. Aircraft overflights do not significantly contribute to the noise environment at the Project site, and the Project would not expose future Project patients or employees to excessive noise levels. In addition, the Project site is not located within the vicinity of a private airstrip. Therefore, the Project would not result in exposure of people residing or working in the Project area to excessive noise levels from either airport or airstrip-related activities, and no mitigation is required.

4.10.6 CUMULATIVE IMPACTS

Cumulative Traffic Noise Increases

Cumulative traffic noise impacts are measured based on projected long-term future traffic noise level increases over existing conditions. This analysis considers the forecasted traffic volumes for scenarios that include approved and pending (not-approved) projects currently in process within the City of West Covina or adjacent communities that could impact traffic volumes within the study area, which is the 2035 scenario described. Long-term cumulative offsite impacts from traffic noise are measured as follows. First, a substantial cumulative noise increase would occur if future traffic noise levels increase by more than 3 dBA compared to existing conditions.

Table 4.10-15 shows the cumulative noise level increases associated with the Project. With the exception of western segment of the Vine Avenue and Sunset Avenue intersection, there is no substantial cumulative noise increase (i.e., more than 3 dBA between 2035 With-Project and the existing conditions). The incremental increase in overall ambient noise levels is due to increased Project-related traffic accessing the Project site. Noise level increases associated with travel along roadways, including those of Vine Avenue and Sunset Avenue, are not considered to be substantial and would not expose offsite uses to excessive noise level increases. Therefore, the

proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact due to traffic noise, and no mitigation is required.

**TABLE 4.10-15
CUMULATIVE OFFSITE TRAFFIC NOISE IMPACTS**

Intersection	Segment	CNEL at 100 feet from roadway centerline (dBA)			
		No Project	With Project	Project Contribution	Potential Impact?
Francisquito Ave/Sunset Ave	East Segment	69.3	70.3	1.0	No
	West Segment	69.4	70.4	1.0	No
	North Segment	70.3	71.4	1.1	No
	South Segment	70.4	71.5	1.1	No
Durness St/Sunset Ave	East Segment	57.6	58.6	1.0	No
	West Segment	60.5	61.5	1.0	No
	North Segment	70.4	71.5	1.1	No
	South Segment	70.4	71.5	1.1	No
Merced Ave/Sunset Ave	East Segment	68.4	69.6	1.2	No
	West Segment	68.1	69.2	1.1	No
	North Segment	70.7	71.9	1.2	No
	South Segment	70.5	71.6	1.1	No
Vine Ave/Sunset Ave	East Segment	56.5	57.6	1.0	No
	West Segment	59.2	63.5	4.3	No
	North Segment	70.9	72.4	1.4	No
	South Segment	70.7	71.9	1.2	No
Cameron Ave/Sunset Ave	East Segment	68.8	69.9	1.1	No
	West Segment	69.2	70.3	1.2	No
	North Segment	70.1	71.5	1.4	No
	South Segment	70.8	72.3	1.4	No
West Covina Pkwy/Sunset Ave	East Segment	67.3	68.4	1.0	No
	West Segment	67.4	68.8	1.4	No
	North Segment	70.1	71.2	1.1	No
	South Segment	70.1	71.5	1.4	No
I-10 EB Ramps/Dalewood St	East Segment	4.8	4.8	0.0	No
	West Segment	63.8	64.9	1.2	No
	North Segment	67.8	69.0	1.3	No
	South Segment	68.7	69.8	1.1	No
Merced Ave/Dalewood St/Garvey Ave	East Segment	66.8	68.1	1.3	No
	West Segment	4.8	4.8	0.0	No
	North Segment	61.4	62.4	1.0	No
	South Segment	67.8	69.0	1.3	No
Merced Ave/Orange Ave	East Segment	67.7	68.9	1.2	No
	West Segment	66.8	68.0	1.3	No
	North Segment	66.4	67.5	1.0	No
	South Segment	66.2	67.3	1.0	No
Merced Ave/California Ave	East Segment	68.0	69.2	1.2	No
	West Segment	68.0	69.2	1.2	No
	North Segment	63.0	64.0	1.0	No
	South Segment	62.7	63.8	1.0	No

**TABLE 4.10-15
CUMULATIVE OFFSITE TRAFFIC NOISE IMPACTS**

Intersection	Segment	CNEL at 100 feet from roadway centerline (dBA)			
		No Project	With Project	Project Contribution	Potential Impact?
Merced Ave/Glendora Ave	East Segment	67.5	68.6	1.1	No
	West Segment	68.0	69.2	1.2	No
	North Segment	70.1	71.1	1.0	No
	South Segment	69.9	71.0	1.1	No
Cameron Ave/Orange Ave	East Segment	69.7	70.8	1.1	No
	West Segment	69.4	70.5	1.0	No
	North Segment	59.9	61.4	1.5	No
	South Segment	67.5	68.5	1.0	No
Cameron Ave/Toluca Ave	East Segment	69.1	70.3	1.2	No
	West Segment	69.8	70.9	1.1	No
	North Segment	62.5	63.8	1.2	No
	South Segment	44.1	45.3	1.2	No
West Covina Pkwy/I-10 WB Ramps	East Segment	68.8	70.1	1.3	No
	West Segment	68.1	69.2	1.0	No
	North Segment	61.6	62.6	1.0	No
	South Segment	65.9	67.2	1.3	No
West Covina Pkwy/I-10 EB Ramps	East Segment	67.8	69.2	1.4	No
	West Segment	68.8	70.1	1.3	No
	North Segment	59.3	60.3	1.0	No
	South Segment	63.6	64.8	1.2	No
West Covina Pkwy/Toluca Ave	East Segment	67.2	68.6	1.4	No
	West Segment	67.6	69.1	1.5	No
	North Segment	4.8	4.8	0.0	No
	South Segment	62.9	64.1	1.2	No
Ave: Avenue; Pkwy: Parkway; I-: Interstate; St: Street; WB: westbound; CNEL: community noise equivalency level; dBA: A-weighted decibels.					
Source: Table 11, <i>Noise and Vibration Analysis</i> , Psomas 2018.					

The preceding analysis determines that over the long-term under buildout conditions, the proposed Project would result in less than significant cumulative impacts in terms of exposure of persons to noise levels as defined in the City of West Covina Noise Ordinance, PlanWC Noise Element, and the West Covina General Plan Environmental Impact Report (EIR). Likewise, the Project would result in less than significant impacts for groundborne vibration and groundborne noise levels. The Project would not result in a substantial permanent or temporary increase in ambient noise levels in the Project vicinity above levels existing without the Project, and impacts would be less than significant. On a cumulative basis, the Project would not result in exposure of people residing or working in the Project area to excessive noise levels from private or public airports. The preceding analysis also determined that the Project would have less than significant noise impacts within the Project site or at nearby sensitive receptors based on the design and location of future Project-related uses and improvements. Therefore, the Project would not make any significant contributions to cumulatively considerable noise impacts, and mitigation is required.

4.10.7 IMPACT OF MITIGATION MEASURES

The analysis in Sections 4.10.5 and 4.10.6 determined the Project would not have any significant direct or cumulative noise impacts, and no mitigation is required.

4.10.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

- Impact 10.1** Impacts would be less than significant for long-term Project-generated traffic noise to offsite receptors and long-term Project-generated onsite noise.
- Impact 10.2** Construction and operational vibration impacts would be less than significant.
- Impact 10.3** Construction-related noise impacts would be less than significant.
- Impact 10.4** Noise-land use compatibility and operational noise impacts of the Project would be less than significant. Construction noise levels would not exceed the limits established in the Municipal Code, so impacts in this regard are less than significant.
- Impact 10.5** The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport, so Project would not expose people residing or working in the Project area to excessive noise levels, and no mitigation is required.
- Impact 10.6** The Project is not located in the vicinity of a private airstrip, so it would not expose people residing or working in the Project area to excessive noise levels, thus no mitigation is required.

4.10.9 REFERENCES

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4.11 POPULATION AND HOUSING

The proposed Queen of the Valley Hospital Specific Plan (QVHSP) Project does not involve the development of housing or implementation of any uses or actions that would substantially increase population or employment in the region. Rather, implementation of the proposed Project, which includes improvements and expansion of the hospital, would serve to meet the anticipated future demand for hospital services and accommodate the needs of the surrounding communities. This section summarizes existing and forecasted population, employment, and housing for the region and the City of West Covina. This section also presents the existing and projected Queen of the Valley Hospital campus indirect population growth related to new employment.

The analysis and discussion in this section is primarily based on information from the California Department of Finance (DOF); California Employment Development Department (EDD); Southern California Association of Government's (SCAG) 2016 Regional Growth Forecasts; the West Covina General Plan 2016 (PlanWC), and 2014-2021 Housing Element, and the City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR (Section 4.11, *Population and Housing*).

A letter from the SCAG submitted during the Notice of Preparation (NOP) period provided information on population and housing and requested the EIR address SCAG's regional goals (see Section 4.9, *Land Use and Planning*). A copy of the SCAG NOP comment letter is included in Appendix B of this Program EIR.

4.11.1 RELEVANT POLICIES AND REGULATIONS

State

State of California Fair Share Housing Requirements

State housing law calls upon local jurisdictions to provide for very low-, low-, and moderate-income housing. In implementing this law, the Housing and Community Development Department (HCD) assigns fair share housing targets to each jurisdiction and requires local General Plan Housing Elements to address how these fair share housing targets can be achieved during the specified timeframe given local demographics, land use, and zoning. State law requires local jurisdictions to submit Housing Elements for HCD review and approval. The City of West Covina's 2014–2021 Housing Element was adopted by the City Council on October 1, 2013 and amended on December 20, 2016 (Resolution 2016-88). Implementation of these housing laws at the regional level (SCAG) and at the local level (City of West Covina) is discussed below.

Southern California Association of Governments

2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

Section 4.9, *Land Use and Planning* of this Program EIR, includes a discussion of SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and analysis of the proposed Project's consistency with the established goals. With respect to population, housing and employment, using growth forecasts and economic trends, the RTP considers the role of transportation in a more holistic light, including economic factors, environmental issues, and quality-of-life goals. The SCS is an element of the RTP that demonstrates the integration of land use, transportation strategies, and transportation investments within the RTP. This requirement was put in place by the passage of Senate Bill (SB) 375 (Program EIR Section 4.6, *Greenhouse Gas Emissions*), with the goal of ensuring that the SCAG region can meet its regional

GHG reduction targets set by the California Air Resources Board (CARB). The overall land use pattern in the RTP/SCS focuses on jobs and housing in the region's designated High Quality Transit Areas (HQTAs)¹ that have been identified in the region. The Project site is almost a half mile from a heavily used transit area so it is not within a designated HQTA (SCAG 2016).

The 2016–2040 RTP/SCS depends on an accurate and credible forecast for future growth in population, housing, and employment. The integrated growth forecast at the regional and small geographic area level is the basis for developing the RTP and SCS. In developing regional growth forecasts SCAG coordinates extensively with cities and counties to gain local input on the integrated population, household, and employment growth forecast.

Regional Housing Needs Assessment

State law requires all regional councils of government (COGs), also known as municipal planning organizations (MPOs), which includes SCAG, to determine the existing and future housing needs for its region (*California Government Code*, Section 65580 et. seq.). SCAG is also required to determine the allocation of housing that must be accommodated in each city and county in the SCAG region.

Southern California Association of Government's Regional Housing Needs Assessment (RHNA) provides an allocation of the existing and future housing needs by jurisdiction. This is based on income level, existing housing needs in each city and county, and the fair share allocation of the projected regional population growth. The allocations are driven by the intent that a better balance between jobs and housing should occur in various areas of the region and that every city should incur its fair share in the development of affordable housing units and in meeting future housing needs. All local governments, including West Covina, are required to set aside sufficient land, adopt programs, and provide funding (to the extent feasible), to facilitate and encourage housing production commensurate with that housing need. Housing needs are broken down by income group, based on household size and the County of Los Angeles's Area Median Income (AMI) from the 2005–2009 American Community Survey (ACS). The income groups are as follows (SCAG 2011):

- **Very Low Income:** less than 50 percent of the AMI
- **Low Income:** 50 to 80 percent of the AMI
- **Moderate Income:** 80 to 120 percent of the AMI
- **Above Moderate Income:** above 120 percent of the AMI.

The City must demonstrate that its land inventory is sufficient to facilitate and encourage the development of affordable housing that is accessible to a variety of income groups. For the 2014–2021 planning period, the City of West Covina's final housing allocation is provided in Table 4.11-1. The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate the housing units shown in the table.

¹ An HQTA is generally a walkable transit village or corridor, consistent with the adopted RTP/SCS that has a minimum density of 20 dwelling units per acre and is within ½ mile of a well-served transit stop with 15-minute or less service frequency during peak commute hours. The 2040 Plan HQTAs are planned and projected to accommodate 46 percent of the region's future household growth and 55 percent of the future employment growth.

**TABLE 4.11-1
WEST COVINA'S HOUSING ALLOCATION (2014–2021)**

Income Group	Very Low	Low	Moderate	Above Moderate	Total
Future Housing Need (units)	217	129	138	347	831
Percent*	26%	15.8%	16.7%	14.5%	100.0%
* Percentage amounts may not add to 100 due to rounding. Source: SCAG 2012.					

City of West Covina

West Covina General Plan

The “Our Prosperous Community” Chapter of PlanWC (West Covina 2016a) discusses existing and planned land uses in the City and provides a summary of the City’s demographics, housing stock, employment and fiscal health. This chapter provides a summary of City’s market context, and the policies and actions requiring implementation to achieve the City’s key goals and objectives as identified by community participation.

The “Our Prosperous Community” Chapter of PlanWC includes the goal to nurture local businesses and attract non-retail jobs and includes the following policy and action related to population, housing, and employment:

Policy 2.7: Target employment-based uses to downtown. Education, healthcare, and professional services are expected to have above-average growth, thus, securing employers in the healthcare and professional services sectors have the potential to improve the City’s economic strength and provide high-quality jobs for residents as well as anchor currently underutilized sites in West Covina’s downtown, and support the City’s fiscal health (West Covina 2016a).

Action 2.7a: Explore health/medical campus opportunities. The addition of health/medical campuses in the City have potential to support quality employment for residents and be an additional amenity for residents seeking medical care. The City’s current significant medical presence could be leveraged to capture other major medical institution or medical campus. This includes understating the facility needs and continuum of care services of the existing regional and local health care institutions such as Citrus Valley Hospital or Doctor’s Hospital to include, physician’s offices, specialty practices, rehabilitation centers, assisted living facilities, and nursing facilities (West Covina 2016a).

The Housing Element of PlanWC is intended to provide a greater understanding of housing needs in West Covina and to provide guidance to the decision-making process in all matters related to housing. The document analyzes existing and future-housing needs, develops a problem-solving strategy, and provides a course of action towards achieving West Covina's housing goal (West Covina 2016b).

The 2014–2021 Housing Element indicates that to accommodate the City’s RHNA allocation of 831 units for the 2014-2021 planning period, the City has identified seven opportunity sites within the Downtown area that combined would accommodate 1,094 units (West Covina 2016b). This capacity is more than adequate to accommodate the City's 2014–2021 RHNA of 831 units.

Note that consistency with relevant goals and policies in the City's Housing Element were previously discussed in Section 4.9, *Land Use and Planning*, of this Program EIR.

4.11.2 METHODS

This section shows the existing and projected population, housing, and employment of the City and surrounding region and determines if the projected employment growth that would result from the proposed hospital expansion would have any significant impacts on local or regional population, housing, or employment.

4.11.3 EXISTING SETTING

As discussed above, growth forecasts for individual cities and counties have been prepared by SCAG as part of its regional planning efforts for the development of the 2016-2040 RTP/SCS and the RHNA. SCAG's 2016 Regional Growth Forecasts are the currently adopted population, housing, and employment forecasts for the six-county region, including Los Angeles County. Southern California Association of Government's 2016 Regional Growth Forecasts for the City of West Covina and Los Angeles County are shown in Table 4.11-2.

**TABLE 4.11-2
SCAG 2016 GROWTH FORECASTS**

Characteristic/Location	Year			
	2012	2020	2035	2040
Population				
West Covina	107,000	108,900	114,100	116,700
Los Angeles County	9,922,600	10,326,200	11,145,100	11,514,800
Households				
West Covina	31,700	32,700	34,200	35,000
Los Angeles County	3,257,600	3,493,700	3,809,300	3,946,600
Employment				
West Covina	29,500	31,700	33,300	34,300
Los Angeles County	4,246,600	4,662,500	5,062,100	5,225,800
Source: SCAG 2016a.				

Table 4.11-2 presents population, households, and employment projections through 2040 for West Covina and Los Angeles County based on the SCAG's RTP 2016-2040 projections. The projections indicate that the City's population growth would be approximately nine percent over the next 28-year period, from 107,000 in 2012 to 116,700 in 2040, an estimated increase of 9,700 new residents by 2040. New households are expected to increase 10.4 percent over the 28-year period for a total of increase of 3,300 units from 2012 levels. Employment is projected to increase approximately 16.2 percent from 2012 levels, for a total of approximately 4,800 new jobs by 2040. This would increase the City's jobs-housing ratio from 0.93 jobs per household in 2012 to 0.98 jobs per household in 2040. By comparison, the countywide jobs/housing ratio is forecast to be 1.321 in 2040.

Table 4.11-3 provides the existing population, housing, and employment information for the City of West Covina and includes the existing SCAG projections.

**TABLE 4.11-3
POPULATION, HOUSING, AND EMPLOYMENT**

	Existing	Projections		
	2018 ^a	2020 ^b	2035 ^b	2040 ^c
City Population	108,245	108,900	114,100	116,700
City Housing Stock	32,900	32,700	34,200	35,000
City Employment	—	31,700	33,300	34,300
Sources:				
^a DOF 2018a				
^b SCAG 2016a				

Existing and Projected Population

From 1950 to 1962, West Covina grew 1,500 percent, from a population of 4,499 to 54,688. Since 1962, The City's population has roughly doubled. The City's population increased from 2000 to 2004, then declined from 2005 to 2010, and increased again from 2011 to 2016 (West Covina 2016c). The City's estimated 2018 population is approximately 108,245 persons, a 0.04 percent decrease from its 2017 population of 108,289 (DOF, 2018b). This includes 107,571 persons in households and 674 persons in group quarters (which includes prisons, jails, dormitories, convalescent homes, group homes, and other similar facilities). As of 2018, the City's population of 108,245 represented approximately 1 percent of Los Angeles County's total population of 10,283,729 persons.

As shown in Table 4.11-3, the City's 2018 population of 108,245 persons is within the SCAG's 2016 Regional Growth Projections for the City for 2020. PlanWC buildout projections would add an additional 2,100 units between 2016 and 2040 (West Covina 2016c). According to PlanWC buildout projections and based on City's estimated average household size of 3.41 persons in 2016, this would lead to an increase of approximately 7,161 residents in the City between 2016 and 2040. Based on the added 7,161 new residents to the City's 2016 population of 107,873, future residential growth facilitated by the PlanWC buildout projections would increase the City's total population to 115,034, which is below SCAG's 2040 population forecasts of 116,700 from the 2016 RTP/SCS (West Covina, 2016c).

Further, The Queen of the Valley Hospital site and the Sunset Park property are not developed with housing units or group quarters and do not include a resident population.

Existing and Projected Housing

The total number of households in the City has increased every five years from the period 2000-2015 (West Covina 2016c). There has also been an overall increase in the number of households in the City over the past 15 years. The average household size in the City increased slightly from 3.32 persons per household (pph) in 2000 to 3.41 pph in 2016 (West Covina 2016c).

Between 2000 and 2010, approximately 652 housing units were added to the City's housing inventory, an average yearly increase in the housing stock of approximately 65 housing units. Between 2010 and 2016, approximately 220 housing units were added to the City's housing inventory, an average yearly increase of approximately 31 units, reflecting a decrease in housing unit growth in the City in the latter half of the last decade following the economic downturn. Of the 32,930 housing units in the City in 2016, an estimated 1,522 units (approximately 4.6 percent)

were vacant (West Covina 2016c). Table 4.11-4 summarizes the City's 2018 housing stock, as identified by the DOF.

**TABLE 4.11-4
2015 HOUSING UNITS BY TYPE**

Housing Type	Units	Percent of Total Units
Single-Family Detached	21,243	64.6
Single-Family Attached	3,117	9.5
Multi-family, 2–4 Units	1,235	3.7
Multi-family, 5 or More Units	6,960	21.2
Mobile Homes	345	1.0
Total Units	32,900	100.00%
Source: DOF 2018a.		

As of January 2018, the California DOF estimates that there are 32,900 housing units in the City. Of these, 31,659 dwelling units were occupied, which translates to a vacancy rate of 3.8 percent. The City's average household size is approximately 3.4 persons per household (DOF 2018a). There are no housing units on the Project site.

Southern California Association of Government 2016 Regional Growth projections for the City show 32,700 households by 2020, 34,200 households by 2035, and 35,000 households by 2040, as shown in Table 4.11-3 above. In contrast to the SCAG's 2016 population forecasts, the City's current 2018 housing stock exceeds SCAG's 2016 forecasts for the City for 2020. By comparing the existing number of housing units in the City with the PlanWC buildout projection of an additional 2,100 units by 2035, the City's growth projections would not exceed the SCAG 2016 Regional Growth Forecast, which indicated a forecast of 34,200 residential units by 2035 (West Covina 2016c).

Existing and Projected Employment

As of 2018, the Queen of the Valley Hospital Campus provides 1,687 jobs in the City of West Covina (Blakely 2018). These jobs represent approximately five percent of total employment within the City as shown in the SCAG projected growth between 2012 and 2020 (29,500 in 2012 and 31,700 projected in 2020) (refer to table 4.11-2, SCAG 2016 Growth Forecasts).

Southern California Association of Government's 2016 Regional Growth Projections for the City show 31,700 jobs by 2020, 33,300 jobs by 2035, and 34,300 by 2040, as shown in Table 4.11-3 above. According to the California EDD, West Covina's October 2018 labor force consisted of 54,300 persons, of which 51,700 persons were employed and 2,600 persons were unemployed. This translates into the City's unemployment rate of 4.8 percent (EDD 2018a). For comparison, the unemployment rate in the Los Angeles, County was 4.7 percent in October 2018. This compares with an unadjusted unemployment rate of 4.1 percent for California and 3.7 percent for the nation during the same period (EDD 2018b).

Jobs/Housing Ratio

The jobs/housing ratio is a general measure of the "balance" between the number of jobs and number of housing units available in a geographic area, without regard to economic constraints

or individual preferences. The jobs/housing ratio is one indicator of a project's effect on traffic congestion and quality of life in a project area. No ideal jobs/housing ratio is adopted in State, regional, or City policies; jobs/housing goals and ratios are advisory only. Rather, the jobs/housing ratio concept is used as a tool for analyzing if there is a mismatch between the available jobs and housing in an area such that people have to travel long distances between their places of work and residences. A balance of jobs and housing can give residents an opportunity to work locally and avoid employment commutes to other places in the region (West Covina 2016c).

As shown in Table 4.11-2, employment in West Covina was estimated at 29,500 in 2012 (SCAG, 2016). Based on this employment estimate and the City's estimated 2012 population of 107,000, the City's jobs-household ratio in 2012 was 0.93 jobs per household. The projections suggest that the new households within the City are expected to increase 10.4 percent from 2012 to 2040 for a total of increase of 3,300 units. Employment is projected to increase approximately 16 percent from 2012 levels, for a total of approximately 4,800 new jobs by 2040. This would increase the City's jobs-housing ratio from 0.93 jobs per household in 2012 to 0.98 jobs per household in 2040.

The PlanWC growth projections demonstrate projected jobs-housing ratio of 0.93 jobs per housing unit, in 2012 and 0.98 in 2040, indicating a moderately balanced local job-housing condition. However, the overall SCAG regional jobs/housing ratio goal is 1.3 jobs per household so West Covina would remain somewhat housing rich or jobs poor through 2040.

4.11.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact on population and housing if it will:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.11.5 ENVIRONMENTAL IMPACTS

Impact Analysis

Development of individual projects being evaluated at project-specific level in this Program EIR, or development of any future projects identified in the proposed QVHSP, does not include housing or an increase in population growth. Therefore, this analysis of population and housing impacts considers the ten-year horizon year anticipated by the proposed QVHSP at a program-level; no project-specific level analysis is required.

Threshold 11.1	Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?
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The Queen of the Valley Hospital campus is located in the vicinity of several residential areas. Existing residential developments are located to the northwest (across the Walnut Creek Flood Control Channel), to the northeast, east and southeast (across Sunset Avenue). No existing homes would be removed, relocated, or built as a result of the proposed Project.

The improvements and expansion implemented through the QVHSP would serve to meet the anticipated future demand for hospital services. The proposed Project is not intended to induce development; instead it would help address existing hospital facility deficiencies. The proposed Project would not directly induce substantial population growth, because it does not include a residential element. As previously discussed, the Queen of the Valley Hospital campus currently provides 1,687 jobs, and implementation of the QVHSP would provide a net increase of approximately 1,000 jobs in the City that can be filled by the local labor force. This would include the addition of 280 additional staff to the Emergency Department/Intensive Care Unit (ED/ICU) and 100 additional staff to the Medical Office Building (MOB). However, the Project's estimated jobs would represent a negligible amount of the total employment growth projected in the City and County in future years accounting for approximately six percent of total employment within the City of West Covina in the year 2040 (34,300). Employment growth resulting from operation of the proposed Project would not result in a significant impact.

In addition, the Citrus Valley Partners Medical Residency Program may expand its program to include the Queen of the Valley Hospital campus in the future. This program addition is anticipated to represent a minor increase in population growth within the City as the program is open only to medical residents. Further, it would be anticipated that the additional medical residents would already reside within the City or commute from nearby locations to the program. However, at this time the discussion and analysis of the residency program expansion into the Queen of the Valley Hospital campus may be speculative, as no planning of the program's expansion to the campus is currently scheduled.

Construction of the hospital facilities would occur over an approximate 10-year period. The proposed Project would generate short-term construction jobs, but the number of construction workers employed and working on-site would vary over the course of the construction period. Construction jobs would be created during site improvements and construction. Detailed construction employment estimates are not available at this stage of the planning process for the proposed Project; however, it is anticipated based on output from the California Emissions Estimator Model (CalEEMod) related to worker vehicle trips, that there would be a relatively small number of construction jobs generated during the building phases, and the demolition and site preparation, grading and painting phases. Construction jobs often draw from the pool of local construction workers, and construction workers commute to jobs sites. Therefore, they are not likely to relocate their households as a consequence of construction work opportunities. Therefore, these construction jobs would be typically filled by existing residents of the region and would not induce housing demand near the construction site due to the temporary nature of construction projects. Thus, the potential growth associated with project-generated jobs during construction would not be substantial resulting in a less than significant impact.

As discussed previously, based on SCAG's adopted 2016 Regional Growth Forecasts, the PlanWC growth projections demonstrate a projected jobs-housing ratio of 0.93 jobs per housing

unit, in 2012 and 0.98 in 2040, indicating a moderately balance job-housing condition. The Project's estimated jobs would represent a small but important amount of the total employment growth projected in the City and County in future years and would incrementally improve the jobs-housing ratio within the City over the long-term.

In addition, as previously identified, the Project site is not in a SCAG-designated HQTa but the QVHSP would still promote the use of non-vehicular transportation systems near employment (refer to the policy consistency analysis provided in Section 4.9, *Land Use and Planning*) to the extent practical given the nature of the proposed Project improvements. Further, the demand for public services and the impacts of development allowed by the proposed QVHSP on these services are discussed in Section 4.12, *Public Services and Recreation*. As identified in this section, the impacts on public services due to the increase in the City's employment base would be considered less than significant with incorporation of Project design features; and adherence to regulatory requirements (including payment of established development impact and mitigation fees). Also, since increases in employment would be incremental over time as each area of the site is developed, the Project would not lead to concentrated and substantial growth at any one time and the public service providers would address increased demand for services as they are experienced.

As further discussed in Section 4.14, *Utilities and Service Systems*, of this Program EIR, on-site infrastructure improvements would be included as part of the proposed Project to meet the needs of the proposed development. The proposed Project's utility systems would connect to existing facilities adjacent to the Project site, and off-site improvements, expansions, or upgrades of existing utility systems would not occur such that it would result in indirect population growth. Indirect impacts associated with future growth in the City would be less than significant.

Summary of Impacts: The Project site does not currently offer any residential housing options, nor would any residential units be constructed with implementation of the proposed QVHSP that would result in a direct increase in population in the City of West Covina. Further, Queen of the Valley Hospital campus serves the population within the City of West Covina; the increased employment anticipated by the QVHSP would be negligible when compared with the employment growth projected in the City and County in future years and would not result in a significant impact.

Therefore, implementation of the proposed QVHSP would not induce substantial population growth, either directly or indirectly.

Threshold 11.2	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
Threshold 11.3	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

There is currently no housing on the Queen of the Valley Hospital campus. Therefore, implementation of the proposed QVHSP would have no impact related to the displacement of people or housing necessitating the need for construction of replacement housing elsewhere.

Summary of Impacts: The Project site has no housing so there would be no impacts in this regard and no mitigation is required.

4.11.6 CUMULATIVE IMPACTS

The cumulative study area for population, housing, and employment would include the City of West Covina and is based on the use of the 2016-2040 RTP/SCS Growth Forecast by Jurisdiction. Development of the proposed QVHSP and other projects in the cumulative study area would not lead to any significant direct or indirect increases in population. As discussed above, the estimated increase in the employment population would be approximately 1,000 individuals over the proposed QVHSP ten-year horizon period, which would not represent a substantial amount of the future population growth anticipated in the City of West Covina or County of Los Angeles.

Further, the anticipated employment increases for the proposed QVHSP ten-year horizon period would be accommodated by the proposed on-campus projects. There would be no additional employee growth associated with cumulative projects at the Queen of the Valley Hospital campus. No significant adverse cumulative impacts related to substantial population, housing, or employment growth would occur with implementation of the proposed QVHSP.

The RHNA identifies the existing and future housing needs for each city and county in the region, and State law requires each city and county to provide adequate sites to accommodate future needs and to offer programs to meet existing housing needs. Implementation of the programs in the Housing Element of West Covina and the Housing Elements of other cities and the County is expected to meet the housing needs of existing and future residents. Regular updates of the Housing Elements of cities and counties would identify adequate sites for housing development to meet local and regional growth projections.

No significant cumulative adverse impacts related to substantial population, housing, or employment growth would occur with implementation of the proposed QVHSP. Cumulative impacts would be less than significant, and no mitigation is required.

4.11.7 IMPACTS OF MITIGATION MEASURES

The Project would have a less than significant impact related to population, housing, and employment, and no mitigation is required.

4.11.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed Project's impacts related to direct or indirect population and housing growth would be less than significant but would result in modest employment growth within the City which would improve the City's jobs-housing balance.

4.11.9 REFERENCES

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4.12 PUBLIC SERVICES AND RECREATION

This section analyzes potential impacts from implementation of the Queen of the Valley Hospital Specific Plan (QVHSP) on existing public services and the need for altered government facilities to maintain acceptable service ratios, response times, and/or other performance objectives. Information presented in this section is based on information in the West Covina General Plan 2016 (PlanWC) and the City of West Covina 2016 General Plan Update and Downtown Plan and Code EIR (Section 4.12, *Public Services*, and Section 4.13, *Recreation*) and coordination with affected public service agencies. This section addresses the following public services (the service provider is noted parenthetically):

- Fire Protection (City of West Covina Fire Department)
- Police Protection (West Covina Police Department)
- Schools (West Covina Unified School District)
- Library Services (Los Angeles County Library)
- Parks and Recreation (City of West Covina)

During the Notice of Preparation (NOP) period or scoping session no members of the public or agency representatives expressed concerns regarding public services. All NOP comment letters are included in Appendix A of this Program EIR.

4.12.1 RELEVANT POLICIES AND REGULATIONS

State

Senate Bill 50

Senate Bill (SB) 50 (Leroy Green School Facilities Act), enacted in 1998 as emergency legislation, represents the most significant school facility finance and developer fee reform legislation for school facilities construction and modernization since the adoption of the 1986 School Facilities Act. Senate Bill (SB) 50 established a comprehensive program for funding school facilities based on 50 percent funding from the State and 50 percent funding from local districts, while limiting the obligation of developers to mitigate the impact of projects on school facilities.

Except in very limited circumstances prescribed by statute, Section 65995 of the *California Government Code* establishes the statutory criteria for assessing construction fees for school facilities. The legislation recognizes the need for the fees to be adjusted periodically to keep pace with inflation; therefore, the State of California Department of General Services State Allocation Board (SAB) increases the maximum fees according to the adjustment for inflation in the statewide cost index for Class B construction.¹

SB 50 establishes three levels of Developer Fees that can be imposed upon new development by the governing board of a school district, depending upon certain conditions within a district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, with the State providing the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the *California Government Code*. Level III fees apply if the State runs out of bond

¹ The Office of Public School Construction defines Class B construction as buildings constructed primarily of reinforced concrete, steel frames, concrete floors, and roofs.

funds, allowing the governing school district to impose 100 percent of the cost of school facility or mitigation minus any local dedicated school fundings on the developer. The latest *Commercial/Industrial Development School Fee Justification Study* was prepared for the West Covina Unified School District on July 23, 2015 and was based on the 2014 State Allocation Board (SAB) maximum School Fees (Dolinka Group 2015).

As of January 2018, the maximum School Fees authorized by Section 17620 of the *California Education Code* are \$3.79 per square foot for new residential construction and \$0.61 per square foot for new commercial/industrial construction for unified school districts (K-12). These fees were last adopted by the SAB at its January 24, 2018 meeting. The increased amounts reflect an 8.78 percent increase over the 2016 rates of \$3.48 and \$0.56 per square foot for new residential and commercial/industrial construction, respectively (DGS 2018).

The payment of school mitigation impact fees authorized by SB 50 is deemed to provide “full and complete mitigation of impacts” on school facilities from the development of real property (*California Government Code*, Section 65995). SB 50 provides that a State or local agency may not deny or refuse to approve the planning, use, or development of real property on the basis of a developer’s refusal to provide mitigation in amounts in excess of that established by SB 50.

Mitigation Fee Act

The California Mitigation Fee Act (*California Government Code*, Sections 66000 et seq.) mandates procedures for administration of impact fee programs, including collection and accounting, reporting, and refunds. A development impact fee is a monetary exaction other than a tax or special assessment that is charged by a local governmental agency to an applicant in connection with approval of a development project for the purpose of defraying all or a portion of the cost of public facilities related to the development project. As discussed below, the City of West Covina has adopted development impact fee programs for various public facilities, which are outlined in the City’s Municipal Code.

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California’s Public Park Preservation Act of 1971. Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Local

West Covina General Plan

Several chapters of the City’s General Plan address issues related to public services and recreation (i.e., Our Natural Community Chapter, Our Healthy and Safe Community Chapter, Our Active Community Chapter) (West Covina 2016a). Additional information regarding these Chapters of the General Plan is provided in the existing setting discussion for each public service below, and a discussion of the Project’s consistency with relevant goals and policies is provided in Section 4.9, *Land Use and Planning*, of this Program EIR.

The “Our Natural Community” Section of the City General Plan, Sub-Section 3. Access to Nature, has the following policies and actions regarding public services and recreation:

Policy 1.6 Preserve, conserve, and add to public open space.

Action 1.6a Maintain the existing conservation areas and prohibit any development in spaces designated as parks and open space on the land use plan.

Action 1.6b Continue to add public open spaces through developer dedication, in-lieu fees, or conservation easements.

In addition, the “Our Healthy and Safe Community”, Sub-Sections B. Police, C. Fire, and D. Natural Hazards contain the following policy and action regarding public services:

Policy 6.11 Provide community safety through enhanced police services.

Action 6.11a Increase public access to police services by:

- Increasing police staffing to coincide with increasing population, development, and call for services;
- Require the funding of new services from fees or assessments from new development.

Policy 6.12 Address safety during development review process.

Action 6.12a Incorporate Crime Prevention Through Environmental Design (CPTED) principles and best practices into zoning ordinances and development review processes for new development and major rehabilitation.

Policy 6.13 Resolve extended response time problems by:

- Increasing fire staffing to coincide with increasing population, development, and call for services;
- Require the funding of new services from fees or assessments from new development.

Action 6.13a Incorporate Crime Prevention Through Environmental Design (CPTED) principles and best practices into zoning ordinances and development review processes for new development and major rehabilitation.

Policy 6.14 Address fire-prevention during development review process.

Action 6.14a Dedicated person for fire prevention review during design, construction, inspection, and operation of development projects to ensure adequacy of fire protection, access for firefighting, water supply, and vegetation clearance.

Policy 6.20 Engage in and support inter-agency coordination regarding emergency services and response, and critical facilities.

Action 6.20a Encourage and participate in mutual aid agreements between the fire departments of local cities and Los Angeles County.

Finally, the General Plan “Our Active Community” Sub-Sections 1. Variety of Open Space Types, 3. Public Access to Open Space, and 4. Connect Spaces, contain the following policy and action regarding public services and recreation:

Policy 8.1 Encourage the distribution of a variety of park types and sizes throughout the City.

Action 8.1 Develop variety of new park types of different sizes and require them in new development.

Policy 8.2 Encourage the development of non-traditional park types, including green belts, linear parks, urban trails, and pocket parks.

Action 8.2a Require dedication of land identified as linear park in conjunction with new development.

Policy 8.5 Develop and improve access to parks.

Action 8.5 Identify and eliminate barriers, safety issues along walkways, and gaps in pedestrian and bike net-works, and improve bike facilities that encourage access to parks.

Policy 8.6 Develop a network of open spaces.

Action 8.6a Connect the open spaces to neighborhoods through a series of landscaped streets that provide green links to the Walnut Creek as well as stormwater drainage.

Fire Code

Chapter 10 - Fire Prevention and Protection, Article II. - Fire Code of the West Covina Municipal Code adopts the 2016 California Fire Code, which is based on the 2015 Edition of the International Fire Code (IFC) (West Covina 2018a). The IFC includes regulations for the protection of life and property from fire and explosion. The proposed Project would be required to comply with 2015 California Fire Code (CFC) and West Covina Fire Code, as well as applicable amendments and City Specifications.

Fire Protection Bureau Standards and Guidance Documents

The City of WCFD’s Standards and Guidance Documents provide interpretation and explanations for the CFC. Because conditions are not the same in every city or community, the State’s fire code anticipates the need for local interpretations and applications. The Standards Documents include, but are not limited, to Fire Flow Test, Carbon Monoxide (CO) Devices, Knox Box Installation, Plaza West Covina Tenant Guidelines, Standard Plan Check, and Plan Check for Architectural Plans and Fire Plans. The Guidance Documents include regulations on residential solar photovoltaic installation, among others. Additional guidelines for new construction projects including review of permit applications are under the direction of the Building and Safety Department (West Covina 2018b).

City of West Covina Development Impact Fees

Chapter 17, Article IV, Development Impact Fees of the City’s Municipal Code addresses impact fees for public services. The purpose of these fees is to prevent new residential and commercial/industrial development from reducing the quality and availability of public services provided to residents of the city by requiring that new development contribute to the cost of expanding the availability of community and recreation center, library, police, and park assets in

the city, as applicable. Development Impact Fees (DIFs) include police facilities, fire facilities, park facilities, administration facilities, and public works facilities (West Covina 2018a). No Park Dedication Fees are required for nonresidential development and residential development without a subdivision (West Covina 2017).

Funds for these public facilities have been established where all sums collected pursuant to the requirements outlined in the City's Municipal Code are deposited and used to expand on the availability of assets in the city to serve new development. Those public facilities and other assets are identified in the DIF Study dated September 2, 2015 (West Covina 2018c). The DIF Study analyzes the impact of development on certain capital facilities and calculates impact fees based on that analysis. The methods used to calculate impact fees in the study are intended to satisfy relevant legal requirements, including the California Mitigation Fee Act and, where applicable, the Quimby Act.

4.12.2 EXISTING SETTING

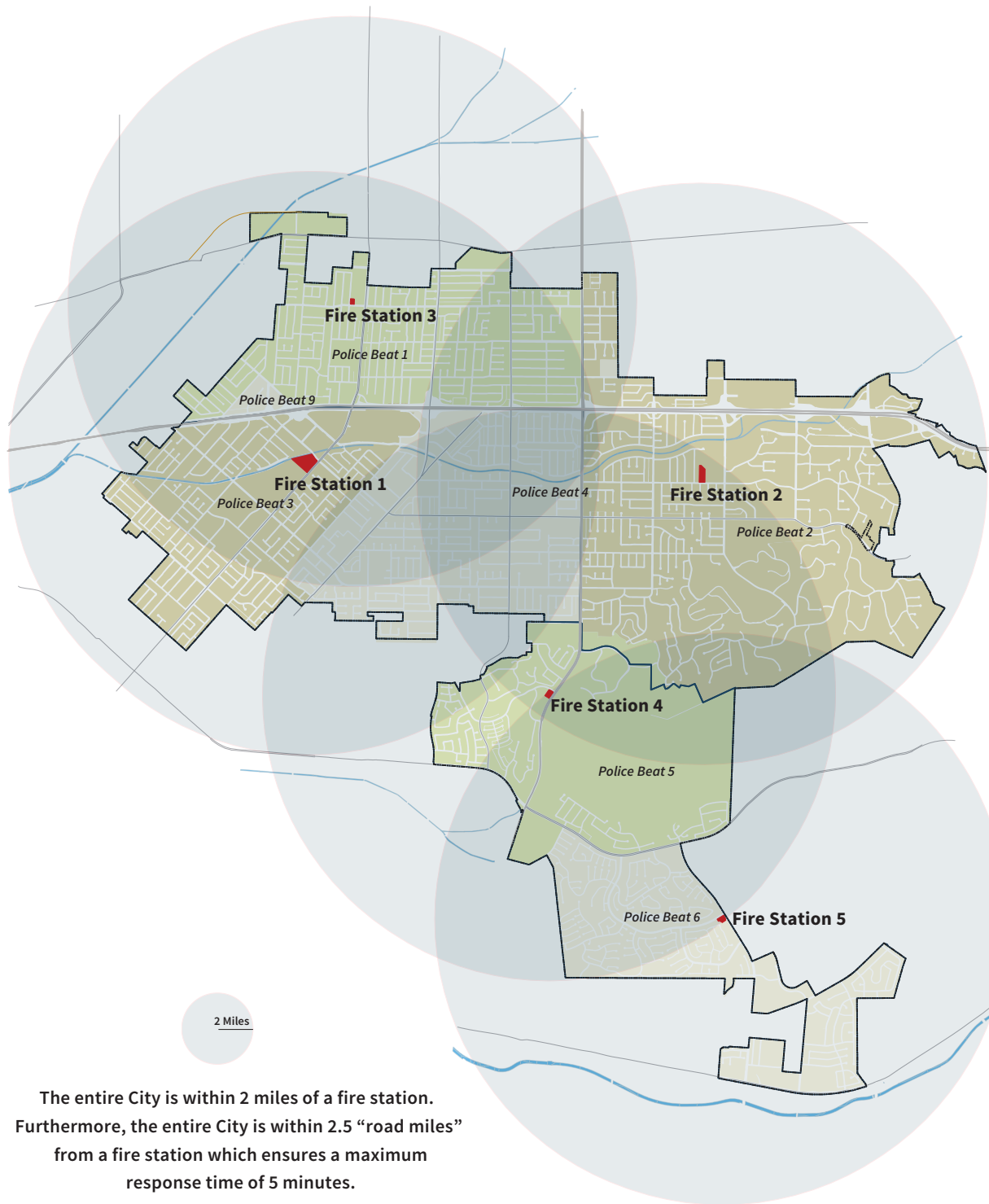
Fire Protection

Fire protection services for the City of West Covina, which includes the Project site, are provided by the WCFD. The WCFD provides fire protection services and emergency response services to medical emergencies and hazardous materials spills within the City of West Covina. The Fire Department serves the City of West Covina through five strategically located stations throughout the City (see Exhibit 4.12-1). Station No.1 is located at 819 South Sunset Avenue; Station No. 2 is located at 2441 East Cortez Street; Station No. 3 is located at 1433 Puente Avenue; Station No. 4 is located at 1815 South Azusa Avenue; and Station No. 5 is located at 2650 East Shadow Oak Drive, as shown in Table 4.12-1. From these five stations, the WCFD staffs five engine companies, one truck company, three paramedic rescue ambulances, and one command unit (West Covina 2018d).

**TABLE 4.12-1
FIRE PROTECTION FACILITIES**

Fire Station No.	Address	Distance to Project Site (Road Miles)
1	819 S. Sunset Ave.	0.25
3	1433 W. Puente Ave.	1.5
4	1815 S. Azusa Ave.	2.3
2	2441 E. Cortez Street	2.9
5	2650 E. Shadow Oak Dr.	4.3
Source: West Covina 2018e.		

The Fire Department currently has 77 professionals, and 6 community volunteer members. The 24-hour protection service is provided daily by 25 trained and qualified personnel on duty through the 5 fire stations serving the City. Each station is staffed with trained paramedics, and the five engine companies, the truck company, and the three ambulances are staffed by California-licensed paramedics and certified Emergency Medical Technicians. Since October 2004, the Fire Department has provided ambulance transportation services for ill or injured patients. Firefighters/Paramedics staff three Advanced Life Support ambulances and respond to all



The entire City is within 2 miles of a fire station.
Furthermore, the entire City is within 2.5 “road miles”
from a fire station which ensures a maximum
response time of 5 minutes.

Source: West Covina General Plan

Local Fire and Police Facilities

Exhibit 4.12-1

Queen of the Valley Hospital Specific Plan EIR



reported medical emergencies along with personnel assigned to engine companies (West Covina 2018d).

In 2015, average response times were 5:17 for medical emergencies and 5:56 for fire related emergencies. Factors in determining response time goals and necessary resources revolve around the standards set forth in National Fire Protection Association (NFPA) Standard 1710, “Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations and Special Operations to the Public by Career Fire Departments,” increased population, density of population, call volume, and unique geographical boundaries that effect response times within the City (West Covina 2018b).

The City of West Covina contracts with Los Angeles County Fire Department for fire protection and emergency medical response. The WCFD agreement with the Los Angeles County Fire Department includes Mutual Aid and Automatic Aid agreements in place to assist with any disaster. In order to combat the emergency situations that may develop and that are beyond the control of any one agency, the County of Los Angeles, District Fire Agencies, and Municipal Fire Departments are signatories to the State of California Master Mutual Aid Plan. In addition, many of the agencies have developed local mutual aid and automatic aid agreements (CalOES 2018).

In addition to responding to fires, medical emergencies, hazardous materials spills, and public assistance calls, West Covina firefighters also perform critically important fire and life safety inspections on each commercial occupancy building at least annually. While conducting fire and life safety inspections, firefighters have the authority to issue “notice to correct” to building owners or managers to ensure that violations of the Uniform Building Code are corrected in a timely manner (West Covina 2016b). In addition, the Fire Department also provides technical fire prevention activities. Members of the Fire Department's Fire Prevention Bureau, under the direction of the Fire Marshal, check building construction plans to make sure all proposed buildings are in compliance with the applicable California Fire Code, California Building Code, California Health & Safety Code, and West Covina Municipal Code prior to construction. Fire inspectors perform plan review on all proposed fire sprinkler systems, fire alarm systems, and restaurant hood extinguishing system installation (West Covina 2016b).

Police Protection

The West Covina Police Department (WCPD) provides law enforcement services to the City of West Covina. The WCPD provides a full range of police services within two Divisions, the Patrol Division and the Investigative & Support Services Division (ISSD). The WCPD headquarters are located in the West Covina City Hall at 1444 West Garvey Avenue. The City of West Covina is organized into four service areas, Service Area 1 (North), Service Area 2 (East), Service Area 3, (Central), and Service Area 4 (South). Each Service Area is assigned a Lieutenant, so that non-emergency public concerns are quickly addressed (West Covina 2016b). The Project site is located within the WCPD Service Area 3, (Central) (WCPD 2018).

The Patrol Division includes the Traffic Unit, the K-9 Unit, Jail Operations, Reserve Officers, Police Cadets, and award-winning SHOP senior volunteers who perform non-hazardous duties to free up sworn officers (WCPD 2018). The WCPD's ISSD carries out the City's Code Enforcement/Community Enhancement program which investigates violations of laws or ordinances relating to public health, safety and welfare, the operation of businesses, consumer protection, building standards, land-use regulations, and other municipal interests. Community Enhancement works in conjunction with the Planning Division, Building Division, Public Works Department, the Police Department, Community Services Department, the County Health Department, Vector Control, and any other public agency as needed (West Covina 2016b).

The ISSD work specialized assignments such as automotive thefts, financial crimes, burglaries, court coordination, homicide, domestic violence, victim advocacy, robbery, sex crimes, and forensics and include the Special Enforcement Team (SET), which focuses on inter-agency operations and narcotics surveillance. In addition, three school resource officers (SROs) are located within the West Covina Unified School District (West Covina High School, and South Hills High School and Edgewood High School) (West Covina 2016b).

In 2017, there were 275 Part 1² violent crime and 2,733 property crime reports taken within the City of West Covina in calendar year 2017 with a 3.8 percent increase in violent crimes from 2016 (265 crimes reported) and a 2.8 percent decrease in property crime when compared to 2016 (2,811 crimes reported) (WCPD 2018b).

The WCPD currently has an authorized workforce of 100 sworn officers. About two-thirds of all sworn officers, work in the Patrol Division, which focuses on patrolling City streets, answering calls for service, and identifying potential crime problems. There are seven officers on patrol during the day and night shifts, and an additional four to five officers on patrol during the mid-day overlap shift. The response time goal for Priority 1 calls, or emergency calls, within the City is 5 minutes or lower. Priority 2 and 3 (Lower Priority), which are non-emergency calls, have a goal of 20 minutes or lower (Priority 2 calls), and Priority 3 has no set response time goal (West Covina 2016b). Police patrols within the City are organized in a beat system, which provides deployment across the City (refer to previous Exhibit 4.12-1).

Schools

Public educational services within the City of West Covina are provided by the West Covina Unified School District (WCUSD), Covina-Valley Unified School District (CVUSD), and Rowland Unified School District (RUSD), as well as other districts at least partially within West Covina, including Hacienda La Puente School District (HLPD), Walnut Valley School District (WVSD), and Baldwin Park School District (BPSD) (West Covina 2016b). The majority of West Covina (including the Queen of the Valley Hospital campus) is within the WCUSD, which currently serves over 14,000 students in fifteen local area schools, two charter schools, and one Pre-School. Local area schools include eight Elementary Schools, three Middle and Intermediate Schools, three High Schools and one Kindergarten through Grade 12 School. The two charter schools include one Kindergarten through Grade 8 School and one Kindergarten through Grade 12 School (West Covina 2016b).

Enrollment at WCUSD schools totaled 14,213 students during the 2014-2015 school year. Elementary schools in WCUSD range in size from 324 students to 580 students, Middle and Intermediate schools range in size from 383 students to 774 students, and High Schools range in size from 191 to 2,426 students. The WCUSD charter schools range from 1,228 students to 3,634 students (West Covina 2016b).

Libraries

Public library services within the City of West Covina are provided by the Los Angeles County Public Library system. The West Covina Public Library is located at 1601 West Covina Parkway, approximately 0.5 mile from the Project site with a facility size of 42,345 square feet (West Covina 2018h). The Library provides study rooms, a meeting room, public computers and access to the Los Angeles County book collection and online resources. In addition, the Library provides children and teen services, including homework help and a Family Center (West Covina 2016b).

² Part 1 crimes are major crimes and include criminal homicide, forcible rape, robbery, aggravated assault, burglary, larceny-theft, motor vehicle theft and arson (FBI 2004).

The West Covina Library Collection includes an online collection available 24-hours, non-English language collection containing Chinese, Japanese, Spanish, and Vietnamese books for children and adult readers, and other special collections including large print (County of Los Angeles 2018).

The West Covina Library services include photocopier, in person and telephone research assistance, and microfilm reader printer. The Library contains 12 public computers, six children's computers, and four English literacy computers (LA County Library 2018).

Library members are also able to access other nearby Los Angeles County Public Libraries, such as the Baldwin Park Library, Covina Library, Sunkist Library, El Monte Library, Norwood Library, and Charter Oaks Library, all of which are within eight miles of the West Covina Public Library (West Covina 2016b). Members of the West Covina Public Library have access to the resources of the entire Los Angeles County Public Library system, which includes 87 community libraries and provides library service to over 3.4 million residents living in unincorporated areas and to residents of 49 of the 88 incorporated cities of Los Angeles County. The materials include 7.5 million volume book collection, along with magazines, newspapers, government publications and many specialized materials including online databases (LA County Library 2018).

Parks and Recreation

City Facilities

The City of West Covina has a range of private and public open space types of varying character and function as shown in Table 8-1, Typology of Open Spaces from PlanWC (West Covina 2016a). The Community Services Division provides for the protection and enhancement of City parks, recreation facilities, and community services (West Covina 2018f). The City of West Covina contains a range of park types that include two small pocket parkettes, eight neighborhood parks, three community parks, two wilderness areas, specialized sports facilities, paseos, and two conservation areas. Based on information presented in the "Our Active Community" Chapter of PlanWC, the City of West Covina has approximately 501.5 acres of improved parkland. Based on the City's 2016 population of 107,873 (West Covina 2016b) and existing parks and open space in West Covina of 501.5 acres, the City has approximately 4.64 acres of park space per 1,000 residents. While, the City of West Covina is largely built out, the greatest opportunity to increase open space located within easy walking distance to neighborhoods is to expand current joint use agreements with public schools. Public schools account for 287 acres of additional open space within the City (West Covina 2016b). With the inclusion of open space with the current joint use agreements with public schools (287 acres), the City has a total of approximately 788.7 acres and a park space allocation of 7.3 acres per 1,000 residents.

In addition, the Downtown West Covina plan envisions its revitalization of the Walnut Creek Wash into a linear open space along the water course. The open space promenade would have a paved bike lane defined by a continuous row of trees. The promenade would include benches and places for passive activity recreation. Further, the plan includes redevelopment of vacant and underperforming parcels in downtown district and along major corridors like Azusa Avenue, Sunset Avenue, and Glendora Avenue that provide opportunity to add new open spaces (West Covina 2016b).

The closest City park to the Project site is Orangewood Park, located at 1615 W Merced Avenue, West Covina, adjacent and to the northeast of the site. The park improvements were recently completed and include two new lighted soccer fields, field fencing and netting, playground area,

restrooms/concession/office building, walking trail, picnic areas, drought tolerant landscaping, irrigation, and new and rehabilitated parking lots (West Covina 2018g).

The closest regional park is the Santa Fe Dam Recreational Area, located at 15501 East Arrow Highway Baldwin Park, approximately four miles from the Project site. The Santa Fe Recreational Area is an 836-acre facility, which includes a 70-acre lake with year-round fishing and non-motorized watercraft usage, and a five-acre chlorinated swim beach and Water Play Area open during the summer season (Los Angeles County 2018a). In addition, the Project site is located approximately 3.5 miles from the Eastern Bank trailhead of the County's San Gabriel River Multi-Use Trail, which runs parallel to the I-605 (Los Angeles County 2018b).

4.12.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact on public services and recreation if it will:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for library services.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks.
- 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.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.12.4 ENVIRONMENTAL IMPACTS

General Plan Consistency

Table 4.12-2 analyzes the Project relative to the policies and actions of the General Plan applicable to public services and recreation.

**TABLE 4.12-2
GENERAL PLAN CONSISTENCY ANALYSIS**

GENERAL PLAN GOAL/POLICY		CONSISTENCY ANALYSIS
GOAL - Our Natural Community		
Policy 1.6	Preserve, conserve, and add to public open space.	Consistent. The City has determined the recreational needs of the City can be better met by converting the Sunset Field property to hospital-related uses and placing the revenue from the sale of the park property into the City's in-lieu park fee account to purchase parkland elsewhere in the City.
Action 1.6	Maintain the existing conservation areas and prohibit any development in spaced designated as parks and open space on the land use plan.	
Action 1.6a	Continue to add public open spaces through developer dedication, in-lieu fees, or conservation easement.	
GOAL - Our Healthy and Safe Community (Sub-Sections B. Police, C. Fire, and D. Natural Hazards contain the following policies and actions regarding public services)		
Policy 6.11	Provide community safety through enhanced police services	Consistent. The Project will expand medical services at the Hospital which will incrementally increase police service needs, Design of new buildings and facilities under the proposed Project will be reviewed by the City police department to assure they meet local police protection requirements and guidelines.
Action 6.11a	Increase public access to police services by: <ul style="list-style-type: none">Increasing police staffing to coincide with increasing population, development, and call for services;Require the funding of new services from fees or assessments from new development.	
Policy 6.12	Address safety during development review process.	
Action 6.12a	Incorporate Crime Prevention Through Environmental Design (CPTED) principles and best practices into zoning ordinances and development review processes for new development and major rehabilitation.	
Policy 6.13	Resolve extended response time problems by: <ul style="list-style-type: none">Increasing fire staffing to coincide with increasing population, development, and call for services;Require the funding of new services from fees or assessments from new development.	
Action 6.13a	Incorporate Crime Prevention Through Environmental Design (CPTED) principles and best practices into zoning ordinances and development review processes for new development and major rehabilitation.	
Policy 6.14	Address fire-prevention during development review process.	Consistent. All of the future improvements built under the proposed Project will be reviewed by City Departments, including fire and police, to assure they meet public safety and access requirements.

**TABLE 4.12-2
GENERAL PLAN CONSISTENCY ANALYSIS**

GENERAL PLAN GOAL/POLICY		CONSISTENCY ANALYSIS
Action 6.14a	Dedicated person for fire prevention review during design, construction, inspection, and operation of development projects to ensure adequacy of fire protection, access for firefighting, water supply, and vegetation clearance.	Consistent. Design of new buildings and facilities under the proposed Project will be reviewed by the City fire department to assure they meet local fire protection codes, requirements and guidelines.
Policy 6.20	Engage in and support inter-agency coordination regarding emergency services and response, and critical facilities.	Consistent. The Hospital is a critical care facility and its expansion under the proposed Project will help serve the health care needs of City residents in the future.
Action 6.20a	Encourage and participate in mutual aid agreements between the fire departments of local cities and Los Angeles County.	Consistent. The City does have and will maintain mutual aid agreements with surrounding jurisdictions including LA County regarding emergency care, including medical services.
GOAL – Our Active Community (Sub-Sections 1. Variety of Open Space Types, 3. Public Access to Open Space, and 4. Connect Spaces, contain the following policies and actions regarding public services and recreation)		
Policy 8.1	Encourage the distribution of a variety of park types and sizes throughout the City.	Consistent. The City has determined the recreational needs of the City can be better met by converting the Sunset Field property to hospital-related uses and placing the revenue from the sale of the park property into the City's in-lieu park fee account to purchase parkland elsewhere in the City.
Action 8.1	Develop variety of new park types of different sizes and require them in new development.	
Policy 8.2	Encourage the development of non-traditional park types, including green belts, linear parks, urban trails, and pocket parks.	
Action 8.2a	Require dedication of land identified as linear park in conjunction with new development.	
Policy 8.5	Develop and improve access to parks.	
Action 8.5	Identify and eliminate barriers, safety issues along walkways, and gaps in pedestrian and bike net-works, and improve bike facilities that encourage access to parks.	
Policy 8.6	Develop a network of open spaces.	
Action 8.6a	Connect the open spaces to neighborhoods through a series of landscaped streets that provide green links to the Walnut Creek as well as stormwater drainage.	

Table 4.12-2 demonstrates that the proposed Project is consistent with the City's General Plan policies and actions regarding public services and recreation, even with elimination of the (former) Sunset Field park property.

Impact Analysis

Fire Protection

Threshold 12.1	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?
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As discussed previously, fire protection and paramedic services for the Project site are provided by the West Covina Fire Department (WCFD), which maintains and operates five stations in the City. The WCFD currently has 77 professionals and six community volunteer members. The 24-hour protection is provided daily by 25 trained and qualified personnel on duty through the five fire stations serving the City. Each station is staffed with trained paramedics, and the five engine companies, the truck company, and the three ambulances are staffed by California-licensed paramedics and certified Emergency Medical Technicians (West Covina 2018b). Fire equipment is distributed throughout the City through the five fire stations. Fire Station 1, located at 819 South Sunset Avenue, is the closest station and would provide fire response to the Project site.

Average response times for Fire services in the City were estimated to be just over 5 minutes for medical emergencies and just under 6 minutes for fire-related emergencies – these and within the response time goals set forth in National Fire Protection Association (NFPA) Standard 1710 (West Covina 2018b). In addition, the entire City of West Covina (Fire Department Service Area) is within 2 miles/2.5 “road miles” from a fire station, which ensures optimal response times (City of West Covina 2016a).

Development and renovation of hospital uses would increase the demand for fire protection and emergency services and the associated demand on fire protection and emergency service apparatus, equipment, and personnel compared to existing levels. However, as described in Section 4.11, *Population and Housing*, the proposed Project does not include a housing element and would not directly or indirectly induce growth. In addition, the proposed new hospital uses are not anticipated to change the types or substantially increase the number of service calls at the Queen of the Valley Hospital campus.

Expansion of the hospital would result in an increase in hospital services; however, it is not expected to have significant impact on fire protection services. To ensure adequate provision of fire protection and emergency services/access to the campus and surrounding areas, the proposed Project would be designed in compliance with the 2015 CFC and West Covina Fire Code and in accordance with all applicable code, ordinances, fire and life safety requirements, and provisions of adequate fire flow and access to the Project site. Additionally, with enhancements of the existing structures and construction of new structures, the impacts related to fire prevention and suppression would further be avoided as new technology would be incorporated into the design of the existing and proposed buildings.

Further, as normal population growth would occur over the life of the Project, the demand for fire and paramedic services would increase proportionally. Although this growth is not specifically caused by Project implementation, the proposed Project would respond to anticipated population growth within the City.

Development of the proposed QVHSP would be required to comply with all applicable code and ordinance requirements including but not limited to constitution, access, water mains, fire flows, and fire hydrants. In addition, the proposed Project would be required to pay all applicable DIFs include police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as outlined in the mitigation measures below. Therefore, with implementation of the following mitigation measures (Ps-1 and PS-2), the Project's potential impacts on public services would be less than significant.

Mitigation Measures

PS-1 Pursuant to Chapter 17, Article IV, Development Impact Fees of the City's Municipal Code, prior to issuance of each building permit, the Queen of the Valley Hospital shall be responsible for payment of the City's Development Impact Fees (DIFs) including police facilities, fire facilities, park facilities, administration facilities, and public works facilities, as appropriate and in amounts established by City Council Resolution. The fees paid shall be those in effect at the time of issuance of the building permit, subject to applicable fee credits for community facilities provided as part of the Project.

PS-2 The Queen of the Valley Hospital shall verify that all Project-related improvements comply with applicable codes, ordinances and standard conditions, including the current edition of the California Fire Code and the West Covina Fire Department regarding fire prevention and suppression measures, fire hydrants, automatic fire extinguishing systems, access, water availability, and fire sprinkler system, among other measures. Prior to issuance of building permits, the Planning Department and West Covina Fire Department shall verify compliance with applicable codes and that appropriate fire safety measures are included in the project design. All such codes shall be complied with and all measures shall be implemented prior to issuance of a certificate of occupancy.

With implementation of Mitigation Measures PS-1 and PS-2, the WCFD would be able to adequately serve the proposed Project within the established response times and distances. Thus, no new, expanded, or altered fire-protection services or facilities would be required to maintain acceptable response times or distances.

Summary of Impacts. No new, expanded, or altered fire protection services or facilities would be required to provide fire protection service in the future. Therefore, no physical impacts associated with new or altered fire protection facilities would result. Implementation of Mitigation Measures PS-1 and PS-2 would help assure that impacts related to fire protection services would be reduced to less than significant levels.

Police Protection

Threshold 12.2	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?
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As discussed previously, the City is organized into four service areas and each Service Area is assigned a Lieutenant so that non-emergency public concerns are quickly addressed (West Covina 2016b). The Project site is located within the WCPD Service Area 3, (Central) (WCPD 2018). The WCPD currently has an authorized workforce of 100 sworn officers and patrols within the City are organized in a beat system for strategic deployment (West Covina 2016b). Based on the City's 2016 population of 107,873 (West Covina 2016b), the WCPD has a ratio of 0.93 sworn officers for each 1,000 residents in the City.

During construction, emergency access to the site by police/security vehicles may be impeded; however, the proposed Project would be required to implement a Traffic Control Plan (refer to Section 4.13, *Transportation/Traffic*) and require on-site emergency access to structures would be in compliance with applicable codes, ordinances, and standard conditions, including the current edition of the California Fire Code. In addition, the proposed Project would add new structures, which would increase demand on existing police protection services. However, with compliance with City standard requirements related to safety (refer to MM PS-4) such as installation of security systems and crime prevention design, the impacts would be less than significant.

As described in Section 4.11, *Population and Housing*, the proposed Project does not include a housing component and so is not anticipated to induce substantial housing or population growth into the City. The proposed Project would result in an increase in employees but would not result in substantial changes in the type or the number of service calls to the hospital campus. Thus, there would not be a substantial increase in the demand for police protection services compared to existing levels, such that it would result in a significant impact.

In light of the above, implementation of the proposed QVHSP would not require new or physically altered WCPD facilities that would cause significant environmental impacts, and no mitigation is required. In addition, the proposed Project would comply with all applicable codes, ordinances, and requirements related to safety and payment of DIFs (see Mitigation Measure PS-1).

Mitigation Measures

PS-3 The Hospital shall comply with PlanWC appropriate Crime Prevention Through Environmental Design (CPTED) features as determined by West Covina Police Department (WCPD) for all improvements related to the proposed Project. CPTED features incorporated into the design of spaces shall include, but not be limited to, territorial reinforcement, strategic natural surveillance, well-lit spaces, and appropriate maintenance. CPTED review of each proposed development shall be completed by the WCPD prior to issuance of building permits.

Summary of Impacts. The proposed Project would comply with all applicable codes, ordinances, and requirements related to safety in addition to payment of DIFs. The Project would not require new or physically altered WCPD facilities that would cause significant environmental impacts. With implementation of Mitigation Measures PS-1 and PS-3, impacts related to police protection services would be less than significant.

Schools

Threshold 12.3	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?
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The proposed Project and hospital associated uses proposed in the QVHSP would not involve development of a residential component that would result in a direct increase/generation of population, such that it would increase demand on the existing school system in the area. However, the proposed QVHSP would generate a relatively small number of employees, including short-term construction and long-term hospital workers. However, as discussed in Section 4.11, *Population and Housing*, of this Program EIR, these positions would likely be filled by the local labor pool. Therefore, it is not expected that schools within the vicinity of the Project site would be impacted by increased demand during construction and operation of the proposed Project. Further, similar to other developments in the area, the proposed Project would be required to pay all applicable school impact fees (Mitigation Measure PS-4).

Mitigation Measures

PS-4 Prior to the issuance of each building permit, the Property Owner/Developer shall pay applicable developer's fees to the impacted school district(s) pursuant to Section 65995 of the *California Government Code*. Under State law, payment of the developer fees provides full and complete mitigation of the project's impacts on school facilities. Evidence that these fees have been paid shall be submitted to the Planning Department.

Summary of Impact. With implementation of Mitigation Measure PS-4, the proposed Project would not result in construction of new or physically altered school facilities, no No physical impacts to schools would occur, and this impact would be reduced to less than significant level.

Libraries

Threshold 12.4	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?
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The proposed development and renovation of the hospital uses proposed in the QVHSP do not involve the development of new residential uses or include a residential component that would result in a direct increase/generation of population, such that it would result in increased demand on the existing libraries serving the City. However, the proposed QVHSP would generate a relatively small number of employees, including short-term construction and long-term hospital workers. However, as discussed in Section 4.11, *Population and Housing*, of this Program EIR, these positions would likely be filled by the local labor pool. Therefore, it is not expected that libraries within the vicinity of the Project site would be impacted by construction and operation of

the proposed Project. The proposed Project would not result in construction of new or physically altered library facilities. No physical impacts would occur.

Parks and Recreation

Threshold 12.5	Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?
Threshold 12.6	Would the proposed 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?
Threshold 12.7	Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed previously, the Community Services Division of the City of West Covina, provides for the maintenance, operation, and enhancement of City parks, recreation facilities, and community services (West Covina 2018d). The City has approximately 4.64 acres of park space per 1,000 residents. In addition, public schools within the City (through a current joint use agreement) account for 287 acres of additional open space within the City (West Covina 2016b), totaling approximately 788.7 acres and a 7.3 acres of park space per 1,000 residents, in compliance with the Quimby Act, with a current ratio of City-owned parkland to population is over 3.0 acres per 1,000 residents.

The closest City park to the Project site is Orangewood Park, located at 1615 W Merced Ave, West Covina, adjacent to the Hospital property to the northeast. The park has two recently completed lighted soccer fields and related improvements.

As described in Section, 3.0, *Project Description*, the Queen of the Valley Hospital currently occupies 1.1 million square feet of buildings on approximately 26 acres but is in negotiation with the City to acquire the 2.8-acre Sunset Field Park at the northeast corner of the hospital property to provide additional surface parking until new parking structures can be built. This would remove the existing 2.8-acre Sunset Field Park from the total acreage of City-owned parkland from the existing 501.5 acres (788.7 with public school joint agreement) totaling 498.7 (785.9). The City would have approximately 4.62 acres of park space per 1,000 residents, or 7.3 acres per 1,000 residents, including the public school joint agreement, and would continue to be in compliance with the Quimby Act, with a current ratio of City-owned parkland to population over 3.0 acres per 1,000 residents. In addition, as discussed in Section 4.9, *Land Use and Planning*, the City has determined the recreational needs of the City can be better met by converting the Sunset Field property to hospital-related uses and placing the revenue from the sale of the property into the City's in-lieu park fee account to purchase parkland elsewhere in the City.

The proposed development and renovation of the hospital uses proposed in the QVHSP do not involve the development of new residential uses or include a housing component that would result in a direct increase/generation of population, and thus, would not increase demand on the existing parks and recreational uses serving the City. However, the proposed QVHSP would generate a relatively small number of employees, including short-term construction and long-term hospital

workers. As discussed in Section 4.11, *Population and Housing*, of this Program EIR, these positions would likely be filled by the local labor pool. Therefore, it is not expected that parks and recreation facilities within the vicinity of the Project site would be impacted by construction and operation of the proposed Project. This impact is less than significant, and no mitigation is necessary.

Summary of Impacts. Converting the Sunset Field property to hospital-related uses would place revenue from the sale of the property into the City's in-lieu park fee account to purchase parkland elsewhere in the City. The City would continue to be in compliance with the Quimby Act, with a current ratio of City-owned parkland to population at 4.62 acres per 1,000 residents. Implementation of the proposed Project would not require new or physically altered parks or recreation facilities that would cause significant environmental impacts, and no mitigation is required.

4.12.5 CUMULATIVE IMPACTS

Past projects within the City of West Covina and surrounding cities within Los Angeles County and unincorporated areas have converted undeveloped and agricultural land to urban uses resulting in residential and employment population increases and associated impacts to public services. The contribution of these past projects to area growth is also reflected in Los Angeles County projections (i.e., 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction). Future regional growth would result in increased demand for public services and facilities. Service providers would continue to evaluate levels of service desired and potential funding sources to meet this demand. Long-range planning for the provisions of public services and facilities is typically based on growth that also reflect General Plan growth projections.

Fire Protection and Police

As additional development occurs in the City of West Covina and surrounding areas, there would be an overall increase in the demand for law enforcement and fire protection services, including personnel, equipment, and/or facilities. However, increases in demand are routinely assessed by the WCFD and WCPD as part of standard monitoring and budgeting process, and law enforcement and fire protection services in the City and County are anticipated to be adequate to serve the proposed Project and cumulative projects. Additionally, the proposed Project's contribution to cumulative impacts would be less than significant since the existing hospital uses would continue to be adequately served with existing personnel, equipment and facilities. No new or expanded WCFD or WCPD facilities would be required to serve the proposed Project, and there would be no associated physical environmental impacts.

Because implementation of the proposed QVHSP can be accommodated by the existing and projected WCFD or WCPD service capabilities, and because existing requirements for fire and life safety (as identified in MM PS-1 and MM PS-2) would be implemented as part of the proposed Project, which continue to ensure the adequate provision of services, the proposed Project would not result in a cumulatively considerable contribution to fire and police protection.

Schools

Increased development throughout the City of West Covina and Los Angeles County would generate additional demand for public school classroom seating capacity within the surrounding school districts. The degree to which this demand would be satisfied is dependent upon future enrollment trends. However, all new private sector development would be required to pay statutory impact fees to school districts (pursuant to Senate Bill 50) to help fund construction of

additional classroom capacity, and, under current law, payment of these fees is deemed to constitute full mitigation under CEQA. For these reasons and assuming that cumulative demand for school capacity would be met as planned by the school districts within and surrounding the City of West Covina and Los Angeles County, cumulative impacts would be less than significant.

However, as discussed above, the proposed QVHSP would add a relatively small number of new employment opportunities, which would likely be filled by the local labor pool. The proposed housing projects do not involve the development of new residential uses that would result in a direct increase/generation of students. As a result, the proposed QVHSP would not have a cumulatively considerable contribution to cumulative impacts on schools.

Libraries

Increased development throughout the City of West Covina and Los Angeles County would generate additional demand for library services and facilities. However, the proposed housing projects would not result in a cumulatively considerable contribution to a significant cumulative impact. The proposed QVHSP would add a relatively small number of new employment opportunities, which would likely be filled by the local labor pool but would not involve an increase in the anticipated student enrollment at the campus, and do not involve the development of new residential uses that would result in a direct increase in demand for library services. As such, implementation of the proposed housing projects is not expected to substantially increase the demand for library services on and off campus and would not have a cumulatively considerable contribution to libraries impacts.

Recreation

The geographic area for cumulative analysis of recreation is defined as the City of West Covina and Los Angeles County. In order to accommodate future cumulative demand, additional park and recreational facilities would be developed and constructed throughout the City of West Covina. Because the size, location, and type of these future facilities in the City of West Covina is not known at this time, it is speculative to assess the magnitude of cumulative impacts associated with the construction of these facilities. However, in accordance with City's requirements new development would be required to dedicate park land and/or improvements/amenities, and/or pay fees in-lieu of dedication, at a rate of three acres per thousand population. Additionally, it is reasonable to expect that all these facilities would undergo CEQA review in accordance with California law, and that project-specific impacts associated with development of each of these facilities would be mitigated to the extent feasible. As a result, the proposed QVHSP would not result in a cumulatively considerable contribution to parks and recreational facilities impacts.

4.12.6 IMPACT OF MITIGATION MEASURES

Implementation of Mitigation Measures PS-1 through PS-4 involve the payment of various DIFs, which would not in and of themselves result in significant environmental impacts. Any future parkland that would be purchased and/or developed as a result of using in lieu park fees collected from development projects (i.e., like the proposed Project) would require separate CEQA compliance that cannot be anticipated or evaluated as part of the CEQA process/document for this Project (i.e., such analysis would be overly speculative).

4.12.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures PS-1 through PS-4, the proposed Project would have less than significant impacts to public services and recreation.

4.12.8 REFERENCES

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4.13 TRANSPORTATION/TRAFFIC

This section assesses traffic impacts resulting from implementation of the proposed Queen of the Valley Hospital Specific Plan (QVHSP) by examining Existing (2018) traffic conditions both without and with the Project. Similarly, Project Interim Year (2022) and General Plan Buildout Year (2035) traffic conditions are analyzed without the Project and with the Project. Information presented in this section is based on the *Traffic Impact Study for the Queen of the Valley Hospital Specific Plan and EIR* (TIS), prepared by Psomas in November 2018 and included in its entirety in Program EIR Appendix H. In addition, Psomas prepared a detailed *Parking Study for the Queen of the Valley Hospital Specific Plan and EIR* in October 2018 (Appendix H). More detailed discussion of the methods, assumptions, and analysis calculations of the traffic and parking studies are provided in Appendix H.

In response to the Notice of Preparation (NOP), several comment letters from members of the public were received regarding traffic, parking, and circulation issues, although no letters were received from public agencies (e.g., Caltrans, LA County). A letter was received from the California Highway Patrol (CHP) that stated they had no comments on the project or EIR since it was not located near any freeways and did not appear to have any impacts on local freeways. Copies of all NOP letters are included in Appendix B of this Program EIR.

4.13.1 RELEVANT POLICIES AND REGULATIONS

Federal

Manual on Uniform Traffic Control Devices

The Federal Highway Administration's (FHWA) Manual on Uniform Traffic Control Devices (MUTCD) is contained in the *Code of Federal Regulations* (CFR, Title 23, Part 655, Subpart F). The FHWA requires that the most recent MUTCD be adopted by individual states as their legal State standard for traffic-control devices within two years of the update. The MUTCD identifies the standards that should be used to install and maintain traffic-control devices on all public streets, highways, bikeways, and private roads that are open to public traffic. The City uses the MUTCD for determining the necessary traffic-control devices (e.g., signs, barricades, gates, warning signs, object markers, guide signs, pavement and curb markings, traffic-control signs, pedestrian control signs, in-roadway lights, and flagger control) on public streets, highways, bikeways, and school areas in the City, including temporary traffic-control devices in and near construction work areas.

State

Senate Bill 743

On January 1, 2019 the State Office of Planning and Research (OPR) issued revisions to the California Environmental Quality Act (CEQA) Guidelines under Senate Bill (SB) 743. The revised CEQA Guidelines establish new criteria for determining the significance of transportation impacts and define alternative metrics to replace the traditional level of service (LOS) metric. The updated Guidelines now identify the reduction of vehicle miles traveled (VMT) as the alternative performance metric to determine significant traffic impacts under CEQA.

Senate Bill 743 replaces the traditional LOS performance metric for identifying environmental impacts with VMT as a more appropriate transportation metric for CEQA assessment. Senate Bill 743 also provides guidance on potential significance impact thresholds related to development

projects, land use plans, and transportation infrastructure projects. In addition, the preliminary guidelines discuss factors for consideration in analyzing traffic safety impacts. The SB 743 guidance language is very specific about what may constitute significant impacts such as stating, “A development project . . . that results in vehicle miles traveled greater than the regional average for the land use type (e.g., residential, employment, commercial) may indicate a significant impact”. It also identifies that a project with VMT less than the regional average for a similar use would not be considered a significant impact. For additional information related to VMT generation associated with the proposed Project, please refer to Section 4.2, *Air Quality*; Section 4.6, *Greenhouse Gas Emissions*, 4.9, *Land Use and Planning*, and Section 6.3, *Energy Conservation*, of this Program EIR.

For the proposed Project, it is assumed that enhanced services would help reduce overall VMT of local residents. Density of the Project and ability to utilize the existing Metrolink station are all attributes that would assist in decreasing the VMT generated by the Project on a per service population basis. The Project’s attributes would help reduce local and regional VMT and therefore the Project is consistent with the goals and policies of SB 743. For additional analysis of the Project’s SCAG’s regional plan goals, see Section 4.9, *Land Use and Planning*, sub-section 4.9.5, *Environmental Impacts*.

Regional

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) adopted the 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) to identify transportation strategies that address mobility needs for the future and to demonstrate the integration of land use, transportation strategies, and transportation investments within the region. The RTP/SCS and Project’s consistency with RTP/SCS is discussed in Section 4.9, *Land Use Planning*, of this Program EIR. As addressed in Section 4.9, the proposed QVHSP is consistent with the goals identified in the RTP/SCS.

Congestion Management Program

Within the SCAG region, there are five Congestion Management Agencies (CMAs) that have the responsibility for preparing the Congestion Management Program (CMP) for their respective counties. In its role as Los Angeles County’s CMA, SCAG prepares, monitors, and periodically updates the Los Angeles County CMP to meet federal Congestion Management Process requirements and the County’s Measure A program.

The Los Angeles County CMP defines a network of state highways and arterials; level of service standards and related procedures; the process for mitigation of impacts of new development on the transportation system; and technical justification for the approach. The CMP sets the LOS standard for the County’s CMP-designated highway system at LOS E for roadway intersections and freeway interchanges in the County’s CMP-designated highway system and implements an enhanced transportation management program to ensure that the designated roadways and intersections meet the set standard for CMP-designated highways and streets in the TIS study area.

The CMP outlines the level of service analysis procedures and guidelines for preparing TIS reports for development projects. The TIS for the Project uses parameters provided in the CMP for Los Angeles County.

Measures R and M Road Funding

Los Angeles County voters approved Measure M in November 2016, which authorized a new one-half cent sales tax starting in 2017 to help fund 40 major highway and transit projects. The vote extended Measure R, which was set to expire in 2039 – Measure M continues the sales tax funding indefinitely until voters decide to rescind it. The City has adopted a development impact fee (DIF) program that is consistent with the requirements of Measure R and M.

Local

City General Plan

The “Our Accessible Community” Section of the City’s General Plan (PlanWC) contains the following policies and actions regarding streets and transportation:

Policy 4.1 Coordinate and integrate land use, economic and transportation planning policies.

Action 4.1 Adopt a new land-use oriented system of street classifications as described in the Citywide Thoroughfare Plan.

Policy 4.2 Accommodate multimodal mobility, accessibility and safety needs when planning, designing, and implementing transportation improvements, improving access and circulation for all users of City streets.

Action 4.2a Adopt and apply transportation system performance metrics as described in the Thoroughfares Plan.

Action 4.2c Accommodate the needs of all travelers through a Complete Streets approach to designing new transportation improvements. Complete streets are roadways designed to facilitate safe, comfortable, and efficient travel for all roadway users.

Policy 4.3 Establish protection of human life and health as the highest transportation system priorities, and seek to improve safety through the design and maintenance of streets, sidewalks, intersections and crosswalks.

Policy 4.11 To ensure that the City is prepared for future changes in transportation technologies and preferred modes of travel, seek to incorporate emerging mobility options such as Transportation Network Companies (TNC) and autonomous vehicles into planning and other efforts.

Action 4.11a Understanding that increased adoption of TNCs and future introduction of autonomous vehicles may reduce parking needs, seek to limit the scale of investments in expensive parking infrastructure (parking structures). Consider investing instead in surface parking lots and on-street spaces that can be more easily repurposed for other needs.

In addition, the “Our Healthy and Safe Community” Section of PlanWC, in the sub-section on “Active Living”, PlanWC has the following policy:

Policy 6.1 Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.

Municipal Code/Development Impact Fee (DIF)

Chapter 17, *Planning*, Article IV, *Development Impact Fees*, of the City's Municipal Code contains the ordinance that implements the Circulation Element of PlanWC and establishes a Development Impact Fee (DIF) program for mitigating the traffic impacts of new development and redevelopment. This regulation establishes the fair-share costs to finance the construction of public improvements needed to mitigate traffic impacts of each development project.

The City Council is required by resolution to set forth the specific amount of the fee; describe the benefit and impact area on which the development fee is imposed; list the Nexus Improvement Program and its components specifying the public improvements to be financed; describe the estimated cost of the facilities; describe the reasonable relationship between this fee and the various types of new developments; and set forth time of payment. This DIF is required to be paid by each developer prior to issuance of building permits. On an annual basis, the City Council reviews this fee to determine whether the fee amounts are reasonably related to the impacts of developments and whether the described public facilities are still needed.

4.13.2 METHODS

Study Area

The study area and analyzed intersections were determined based on preliminary trip generation, trip distribution, and trip assignment estimates developed for the Project; knowledge of the study area; and input from staff in the City's Engineering Department. The study area is consistent with the Los Angeles County CMP study area guidelines and includes all freeway links within a five-mile radius with 100 or more peak-hour project trips, and arterial roadways with 50 or more peak-hour project trips. The City approved the study area and intersections to be analyzed in May 2018. The TIS study area and analyzed intersections are as follows:

1. Francisquito Avenue/Sunset Avenue (signalized)
2. Durness Street/Sunset Avenue (signalized)
3. Merced Avenue/Sunset Avenue (signalized)
4. Vine Avenue/Sunset Avenue (signalized)
5. Cameron Avenue/Sunset Avenue (signalized)
6. West Covina Parkway/Sunset Avenue (signalized)
7. I-10 EB Ramps/Dalewood Street (signalized, Caltrans intersection)
8. Merced Avenue/Dalewood Street/Garvey Avenue (unsignalized)
9. Merced Avenue/Orange Avenue (signalized)
10. Merced Avenue/California Avenue (signalized)
11. Merced Avenue/Glendora Avenue (signalized)
12. Cameron Avenue/Orange Avenue (signalized)
13. Cameron Avenue/Toluca Avenue (unsignalized)
14. West Covina Parkway/I-10 WB Ramps (signalized, Caltrans intersection)
15. West Covina Parkway/I-10 EB Ramps (signalized, Caltrans intersection)
16. West Covina Parkway/Toluca Avenue (signalized)

In addition to the study intersections, the Caltrans segments of I-10 listed below were analyzed because the Project is expected to add 50 or more peak hour trips along each of the segments:

- A. I-605 to Bess Avenue/Frazier Street
- B. Bess Avenue/Frazier Street to Baldwin Park Road
- C. Baldwin Park Road to Francisquito Avenue
- D. Francisquito Avenue to Puente Avenue (within study area)
- E. Puente Avenue to Pacific Avenue/West Covina Parkway (within study area)
- F. Pacific Avenue/West Covina Parkway to Vincent Avenue (within study area)
- G. Vincent Avenue to Azusa Avenue

The locations of these local intersections and freeway segments are shown in Exhibit 4.13-1.

Traffic Counts

Traffic volume data was collected at the study intersections on Wednesday, May 23, 2018 by National Data & Surveying Services for Psomas from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM. The overall peak hours for the study area were found to be from 7:15 to 8:15 AM and from 5:00 to 6:00 PM. Figure 3 shows the existing peak hour traffic volumes. The volumes along I-10 are from 2016 Caltrans data. All collected traffic volume data is included in TIS Appendix A (within Appendix H of this Program EIR).

Analysis of Traffic Impacts

Level of Service (LOS) is the typical measure used to characterize the quality of traffic operations at an intersection or roadway segment. LOS A represents relatively free operating conditions, whereas LOS F has unstable flow and congestion with volumes at or near the capacity of the facility. Excessive delays and queues can occur when the LOS is not acceptable. The traffic generated by the project or by the project in combination with other projects in the area could worsen the LOS of a facility. To assess the potential traffic impacts due to the Project and due to background traffic growth, the following scenarios were evaluated:

- Existing Conditions (2018)
- Existing Plus Project (full project buildout)
- Existing Plus Interim Year 2022 Cumulative Growth
- Existing Plus Interim Year 2022 Cumulative Plus Project Phases 1A and 1B
- Existing Plus Interim Year 2026 Cumulative Growth
- Existing Plus Interim Year 2026 Cumulative Plus Project Phases 1A, 1B, and 2
- General Plan Buildout (2035)
- General Plan Buildout Plus Project Buildout (2035)

This TIS follows the *Los Angeles County Traffic Impact Analysis Report Guidelines* (LADOT 2013). Non-freeway ramp intersections were evaluated based on the LA County guidelines, which apply the Intersection Capacity Utilization (ICU) methodology at signalized intersections. For the unsignalized intersections and the intersections operated under Caltrans' jurisdiction, operational analyses were based on the HCM methodology. Caltrans segments were evaluated based on the lane capacities listed in the Caltrans *Guide for the Preparation of Traffic Impact Studies*. The methodologies and significance thresholds are discussed further in the following sections.



INTERSECTIONS (X)

- | | | | |
|-------------------------------|-------------------------------------|-----------------------------|----------------------------------|
| ① Francisquito Ave/Sunset Ave | ⑤ Cameron Ave/Sunset Ave | ⑨ Merced Ave/Orange Ave | ⑬ Cameron Ave/Toluca Ave |
| ② Durness St/Sunset Ave | ⑥ West Covina Pkwy/Sunset Ave | ⑩ Merced Ave/California Ave | ⑭ West Covina Pkwy/I-10 WB Ramps |
| ③ Merced Ave/Sunset Ave | ⑦ I-10 EB Ramps/Dalewood St | ⑪ Merced Ave/Glendora Ave | ⑮ West Covina Pkwy/I-10 EB Ramps |
| ④ Vine Ave/Sunset Ave | ⑧ Merced Ave/Dalewood St/Garvey Ave | ⑫ Cameron Ave/Orange Ave | ⑯ West Covina Pkwy/Toluca Ave |

CALTRANS SEGMENTS WEST OF MAP

- | |
|---|
| A I-605 to Bess Ave/Frazier St |
| B Bess Ave/Frazier St to Baldwin Park Rd |
| C Baldwin Park Rd to Francisquito Ave |

CALTRANS SEGMENTS SHOWN

- | |
|---|
| D Francisquito Ave to Puente Ave |
| E Puente Ave to Pacific Ave |
| F Pacific Ave to Vincent Ave |
| G Vincent Ave to Azusa Ave |

Source: Psomas 2018

Study Area Intersections and Freeway Segments

Queen of the Valley Hospital Specific Plan EIR



Exhibit 4.13-1

Intersection Capacity Utilization (ICU)

The ICU methodology is used to determine the operating LOS of signalized intersections. This methodology requires the calculation of the intersection volume/capacity (V/C) ratio, which is the summation of critical lane group flow ratios with a yellow clearance adjustment. The LOS estimated by the ICU methodology is directly related to the intersection V/C ratio.

Per the LA County guidelines, a maximum of 2,880 vehicles per hour per lane should be used in the ICU method for dual left-turn lanes, and a maximum of 1,600 vehicles per hour per lane should be used for the remaining lane configurations. A ten percent yellow clearance cycle (i.e. lost time) should be included in the calculations.

The impact related to the Project is considered significant if the increase in the volume to capacity (V/C) ratio with the Project equals or exceeds the values shown in Table 4.13-1.

**TABLE 4.13-1
SIGNIFICANT IMPACT THRESHOLDS – ICU METHODOLOGY**

Intersection Conditions Pre-Project		Project V/C Increase
LOS	V/C	
C	0.71 to 0.80	0.04 or more
D	0.81 to 0.90	0.02 or more
E/F	0.91 or more	0.01 or more
Source: Table 1, <i>Traffic Impact Study</i> , Psomas 2018.		

Highway Capacity Manual

The LA County guidelines do not refer to significant impacts at unsignalized intersections. Since the ICU is a methodology used for signalized intersections, this study applied the HCM methodology to evaluate unsignalized intersections, which defines LOS based on delay. The analyses for the unsignalized intersections were conducted using the software *Synchro*. Even if no thresholds are available for significant impacts at unsignalized intersections, several jurisdictions recommend evaluation methodologies. This study followed the LADOT guidelines (LADOT 2016), which evaluate unsignalized intersections using the HCM methodology to determine the need for the installation of a traffic signal or other traffic control devices. Based on the estimated delay, if the resultant LOS is E or F in the “Future with Project” scenario, it is recommended that a traffic signal warrant analysis be conducted.

Caltrans Guidelines

The LOS at the intersections operating under Caltrans’ jurisdiction is based on measures of effectiveness defined in the HCM. Caltrans aims to have facilities operate at the transition between LOS C and LOS D. There are no formal thresholds from Caltrans to determine significant impacts. Considering that Caltrans wants to maintain facilities operating at LOS D or better, this study assumed that a project-related impact is considered significant if the LOS changes from D or better to E or F. Further, a significant impact occurs if the facility operates at LOS E or F during existing conditions and the project-related traffic results in an increase in delay. For freeway facilities, Caltrans uses the segment flow rates shown in Table 4.13-2, listed in passenger cars per hour per lane.

**TABLE 4.13-2
FREEWAY SEGMENT CAPACITY**

Level of Service (LOS)	Maximum Traffic Flow Rate (passenger cars/hour/lane)
A	710
B	1,170
C	1,680
D	2,090
E	2,350
Source: Table 1, <i>Traffic Impact Study</i> , Psomas 2018.	

Cumulative Projections

The cumulative traffic volumes are the anticipated traffic volumes in a future year without the project traffic. The anticipated annual growth in traffic volumes for this study was assumed to be 1.4% per year, which is the growth rate presented in PlanWC.

4.13.3 EXISTING SETTING

Following is a description of existing transportation facilities in the traffic study area. Quantitative information regarding the existing operations for study area intersections and freeway facilities is provided in the analysis for Threshold 13.1.

Existing Roadway Network

The City of West Covina is situated in the eastern San Gabriel Valley, which is served by several regional freeways and major arterial streets. The Interstate (I)_10 freeway traverses the northern portion of West Covina from east to west, and the State Route 60 (SR-60) freeway is located less than a mile south of the City's southern limit. There are several existing major roadways in the Project vicinity as discussed below:

California Avenue is a two-lane roadway with on-street parking on both sides. In the vicinity of the Project, the roadway is classified as major collector by the City of West Covina (West Covina 2000). From Valley Boulevard to Francisquito Avenue, California Avenue is classified as a minor arterial. The roadway has a posted speed limit of 35 miles per hour (mph).

Cameron Avenue is five-lane road (four travel lanes and a two-way left-turn lane) between Orange Avenue and Sunset Avenue, and a four-lane undivided roadway in the remaining segments. There is on-street parking on both sides of the road. The roadway is classified as a minor arterial by the City of West Covina, and has a posted speed limit of 40 mph.

Dalewood Street is a two-lane roadway in the project vicinity. On-street parking is prohibited along several segments of Dalewood Street, indicated by signs. The roadway is classified as a major collector by the City of West Covina, and has a posted speed limit of 45 mph.

Francisquito Avenue is a mostly a four-lane undivided roadway, with some five-lane (four travel lanes and a two-way left-turn lane) segments. The roadway is classified as a minor arterial by the City of West Covina and has a posted speed limit of 35 mph north of Willow Avenue and 40 mph south of Willow Avenue.

Garvey Avenue is a two-lane roadway in the project vicinity. On-street parking is prohibited along several segments of Garvey Avenue, indicated by signs. The roadway is classified as a major collector by the City of West Covina, and has a posted speed limit of 45 mph.

Glendora Avenue starts at Francisquito Avenue as a five-lane roadway (four travel lanes and a two-way left-turn lane) and becomes a four-lane divided roadway at Michelle Street. On-street parking is allowed along some segments, indicated by signs. The roadway is classified as an “other principal arterial” by the City of West Covina, and has a posted speed limit of 40 mph.

Merced Avenue is a five-lane road (four travel lanes and a two-way left-turn lane) between Orange Avenue and Sunset Avenue, and a four-lane undivided roadway in the remaining segments. There are some locations further to the northeast and southwest where on-street parking is permitted on both sides of the road. Near the Project site, on-street parking is only permitted next to Edgewood High School. The roadway is classified as a minor arterial by the City of West Covina, and has a posted speed limit of 40 mph.

Orange Avenue is a two-lane roadway in the project vicinity. There is on-street parking on both sides of the roadway, and parking restrictions are indicated by signs on several segments. In the vicinity of the project, the roadway is classified as a major collector by the City of West Covina. From Valley Boulevard to Fairgrove Avenue, Orange Avenue is classified as a minor arterial. The roadway has a posted speed limit of 35 mph.

Sunset Avenue configuration varies between a four-lane undivided road, a five-lane road (four travel lanes and a two-way left-turn lane), and a four-lane divided road, depending on the segment. There is generally on-street parking on both sides of the roadway with parking restrictions indicated by signs on several segments, including no parking allowed adjacent to the Project site. The roadway is classified as an “other principal arterial” by the City of West Covina, and has a posted speed limit of 40 mph.

West Covina Parkway is a four-lane divided roadway with a few segments of five-lane road (four travel lanes and a two-way left-turn lane) and four-lane undivided road. On-street parking is prohibited on both sides of the road. The roadway is classified as a minor arterial by the City of West Covina, and has a posted speed limit of 35 mph.

The previous Exhibit 4.13-1 shows the locations of these roadways relative to the Project site. In addition, Table 4.13-3 shows the existing conditions at the Project study area intersections.

**TABLE 4.13-3
EXISTING TRAFFIC CONDITIONS**

Intersection		Intersection Control	AM Peak Hour			PM Peak Hour		
			Delay	V/C	LOS	Delay	V/C	LOS
1	Francisquito Ave/ Sunset Ave	Signalized		0.751	C		0.768	C
2	Durness St/ Sunset Ave	Signalized		0.648	B		0.511	A
3	Merced Ave/ Sunset Ave	Signalized		0.717	C		0.717	C
4	Vine Ave/ Sunset Ave	Signalized		0.592	A		0.592	A
5	Cameron Ave/ Sunset Ave	Signalized		0.800	C		0.730	C
6	W. Covina Pkwy/ Sunset Ave	Signalized		0.690	B		0.723	C
7	I-10 EB Ramps/ Dalewood St ¹	Signalized	23.2		C	17.3		B
8	Merced Ave/Dalewood St/Garvey Ave	Unsignalized	40.0		E	23.8		C
9	Merced Ave/ Orange Ave	Signalized		0.527	A		0.475	A
10	Merced Ave/ California Ave	Signalized		0.962	E		0.958	E
11	Merced Ave/ Glendora Ave	Signalized		0.594	A		0.632	D
12	Cameron Ave/ Orange Ave	Signalized		0.847	D		0.847	B
13	Cameron Ave/ Toluca Ave	unsignalized	86.1 ²		F	159.8 ²		F
14	W. Covina Pkwy/ I-10 WB Ramps ¹	Signalized	39.8		D	36.5		D
15	W. Covina Pkwy/ I-10 EB Ramps ¹	Signalized	10.0		A	13.7		B
16	W. Covina Pkwy/ Toluca Ave	Signalized		0.445	A		0.614	B

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = Volume/Capacity
WB = Westbound
¹ Caltrans Intersection
² Highest Lane Delay at TWSC Intersection
Source: Table 5, *Traffic Impact Study*, Psomas 2018.

Table 4.13-3 indicates that the following three area intersections already exceed City/CMP standards for Levels of Service during either one or both peak hours: (1) Merced Avenue/Dalewood Street/Garvey Avenue (AM Peak); (2) Merced Avenue/California Avenue (AM & PM Peak); and (3) Cameron Avenue/Toluca Avenue (AM & PM Peak).

Alternative Transportation Facilities

The City of West Covina has an adopted Active Transportation Plan (ATP) which includes pedestrian and bicycle improvements (West Covina 2018c). A number of non-vehicular transportation systems operate in the City and the surrounding areas, providing alternative

choices to the use of the private automobile. These alternative transportation systems are described below.

Pedestrian Facilities

Pedestrian conditions in the public right-of-way of downtown West Covina area are typical of commercial areas in postwar suburban communities, characterized by a “superblock” structure consisting of a limited number of streets with relatively few intersections, limited network connectivity and resulting indirect pathways. Pedestrian facilities in the Project site include relatively wide curb-adjacent sidewalks on both Sunset Avenue and Merced Avenue with a signalized intersection and crosswalks at the main hospital entrance (Sunset Avenue/Vine Avenue). These streets lack curbside parking which would typically provide a physical buffer between pedestrians and roadway traffic.

Bicycle Facilities

The City’s ATP includes bicycle lanes and related improvements (West Covina 2018c). At present, there are only a few existing bicycle facilities near the QVHSP area on South Sunset Avenue and West Merced Avenue. Chapter 22, Article III of the Municipal Code define standards for Class I Bike Paths, Class II Bike Lanes, and Class III Shared Routes. A Bike Path is an exclusive facility, while a Shared Route is a street designated as a bicycle route, with no special markings. Bike Lanes, meanwhile, are divided into Class IIa (no parking) and Class IIb (parking permitted) categories. Class IIa lanes must be a minimum of five feet wide, while Class IIb lanes must be at least 13 feet wide. Adjacent to the Specific Plan property there is a Class II bike lane on Sunset Avenue and a Class III bike lane on Merced Avenue.

Transit Facilities

Metrolink

Commuter train service for the City of West Covina is provided by Metrolink, which operates six commuter rail lines throughout Southern California. The closest Metrolink Station to the Project site is located just north of the City at 3825 Downing Avenue in Baldwin Park (1.5 miles northwest of the site) where passenger trains run daily from downtown Los Angeles to downtown San Bernardino. West Covina is served by the San Bernardino Line, which links San Bernardino to Union Station in downtown Los Angeles. The Metrolink railroad runs east-west just north of the City and other foothill communities to the east and west.

Bus Transit

Foothill Transit provides regional bus service for the eastern San Gabriel Valley including the City of West Covina. Transit service is concentrated in the Downtown area where Foothill Transit operates a total of eight routes, including one Bus Rapid Transit or BRT service and an express service. Service to the QVHSP area are provided by Foothill Transit Routes 272 and 281, which have stops adjacent to the Project site. The City also operates a separate “Go West” shuttle bus service consisting of three shuttle routes, labeled Red, Blue, and Green.

4.13.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, a project will normally have a significant adverse environmental impact related to traffic and circulation if it will:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?
- Would the project result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks?

Level of Service Performance Criteria

The City of West Covina, SCAG (as part of the CMP), and Caltrans have established explicit performance criteria for roadway intersection and freeway operations within their jurisdictions. The LOS performance criteria and thresholds of significance that were used to determine Project impacts include:

- **City of West Covina:** The City has adopted LOS D as the minimum acceptable standard. A significant traffic impact occurs if the addition of Project-generated trips causes an intersection to change from an acceptable LOS to a deficient LOS or if Project traffic increases the delay at any intersection already operating at an unacceptable LOS.
- **Caltrans:** Caltrans has adopted LOS C as the minimum acceptable standard for state facilities. A project causes a significant impact if it causes the LOS to change from an acceptable LOS (LOS C or better) to a deficient LOS (LOS D or worse) or if it causes an increase in delay/density on a facility operating at an unacceptable level.
- **CMP:** SCAG, as the congestion management agency, has set LOS E as the minimum acceptable threshold for CMP facilities. However, the CMP states that local agency thresholds should be applied as long as they provide improved service levels compared to the CMP requirements. The CMP threshold for local streets is 50 trips or more per peak hour contributed by the Project.

4.13.5 ENVIRONMENTAL IMPACTS

Impact Analysis

Threshold 13.1	Would the project conflict with any applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
Threshold 13.2	Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion?

Trip Generation

Trip generation represents the amount of traffic that is attracted to and produced by a development and is based on the specific land uses planned for a given project. The proposed Project's anticipated traffic generation was estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (Caltrans 2018) for morning and afternoon weekday peak hour trips. The resulting Project trip generation is shown in Table 4.13-4. The TIS estimated that at buildout the Project would generate 9,587 total average daily trips (ADT) with 776 total AM peak hour trips and 924 total PM peak hour trips. By comparison, existing medical and office uses at the hospital generate approximately 6,899 total daily trips with 564 AM peak hour trips and 652 peak PM hour trips.

**TABLE 4.13-4
PROJECT TRIP GENERATION**

Development Type/Timing	Daily Trips	AM Peak		PM Peak	
		In	Out	In	Out
<u>Existing Hospital & Medical Office Operations</u>	6,899	408	156	196	456
<u>Immediate Improvements (2019)</u> Hospital Areas to Be Demolished	-214	-12	-6	-6	-13
<u>Phase 1A (2022)</u> Addition of Hospital Uses	708	40	19	20	44
<u>Phase 1B (2022)</u> New Medical Building	3,132	195	55	87	224
Total New Trips at the End of Phase 1	3,625	223	68	101	255
<u>Phase 2 (2026)</u> New Hospital Tower	1,415	80	38	41	87
Total New Trips at the End of Phase 2	5,040	303	106	142	342
<u>Buildout (2035)</u> New Hospital Building New Medical Building	1,415 3,132	80 195	38 55	41 87	87 224
Total New Trips at Buildout	9,587	578	198	271	653
Source: Table 3, <i>Traffic Impact Study</i> , Psomas 2018 plus separate trip generation for existing uses provided by Psomas 2019.					

Trip Distribution

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic. The Project trip distribution reflects the likely approach and departure routes to and from the Projects site, as determined through multiple sources. The Project trip distribution is outlined in TIS Figure 7, and indicates the following general distributions and directions:

- 10 percent within West Covina, mainly the downtown area
- 15 percent south and southwest in and out of the City
- 5 percent east (non-freeway)
- 20 percent east on the I-10 Freeway
- 35 percent west on the I-10 Freeway
- 10 percent north of the I-10 Freeway
- 5 percent northwest of the I-10 Freeway

The distribution was estimated based on existing traffic distribution as well as projected traffic distribution relative to certain services on the campus and was approved by the City during the initial work on this study.

Traffic Analysis Scenarios and Assumptions

To identify Project-related impacts, the TIS analyzed the following traffic analysis scenarios:

- Existing Year (2018) Without Project and Plus Project (Full Buildout in 2018)
- Completion of Phase 1 (2022) Without Project and Plus Project
- Completion of Phase 2 (2026) Without Project and Plus Project
- General Plan and Project Buildout (2035) Without and Plus Project

Scenario One: Existing Year (2018) Plus Project Buildout

It should be noted that this scenario identifies what traffic impacts would occur if the entire proposed Project was built today. While this scenario has a number of practical limitations, as outlined in the TIS, it is required under CEQA. However, it is not a realistic “buildable” scenario so specific mitigation is not identified or recommended for this scenario.

Local Intersections

As described in Section 4.13.2, *Methods*, the non-Caltrans signalized intersections were evaluated using the ICU methodology and the unsignalized intersections and Caltrans signalized intersections were evaluated using the HCM methodology. The full buildout (2035) version of the Project was assumed in this analysis for Existing Plus Project conditions. The purpose of the Existing Plus Project Buildout analysis is to provide the baseline for assessing environmental impacts, which is generally the existing conditions at the time that the NOP was issued for the Program EIR. As seen in Table 4.13-5, there are significant impacts under this scenario at seven intersections.

**TABLE 4.13-5
EXISTING PLUS PROJECT IMPACTS (2018) – LOCAL INTERSECTIONS**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
1	Francisquito Ave/ Sunset Ave		0.757	C		0.777	C	No	No
2	Durness St/ Sunset Ave		0.654	B		0.520	A	No	No
3	Merced Ave/ Sunset Ave		0.770	C		0.783	C	Yes	Yes
4	Vine Ave/ Sunset Ave		0.735	C		0.849	D	No	No
5	Cameron Ave/ Sunset Ave		0.903	E		0.902	E	Yes	Yes
6	W. Covina Pkwy/ Sunset Ave		0.779	C		0.875	D	No	Yes
7	I-10 EB Ramps/ Dalewood St ¹	27.0		C	19.1		B	No	No
8	Merced Ave/Dalewood St/Garvey Ave	60.8		F	35.8		E	Yes	Yes
9	Merced Ave/ Orange Ave		0.569	A		0.494	A	No	No
10	Merced Ave/ California Ave		1.026	F		1.032	F	Yes	Yes
11	Merced Ave/ Glendora Ave		0.639	B		0.662	B	No	No
12	Cameron Ave/ Orange Ave		0.905	E		0.874	D	Yes	Yes
13	Cameron Ave/ Toluca Ave	>5 min ²		F	>5 min ²		F	No ³	No ³
14	W. Covina Pkwy/ I-10 WB Ramps ¹	44.7		D	76.0		E	No	Yes
15	W. Covina Pkwy/ I-10 EB Ramps ¹	10.7		B	15.8		B	No	No
16	W. Covina Pkwy/ Toluca Ave		0.480	A		0.672	B	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service V/C = volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 5, <i>Traffic Impact Study</i> , Psomas 2018.									

The Cameron Avenue/Toluca Avenue intersection is two-way stop-controlled (TWSC). Because intersection delay is not defined for TWSC intersections, Table 4.13-5 shows the highest lane delay at the intersection, which occurs on the Toluca Avenue southwest shared through-left lane. Although the highest lane delay represents a LOS F, a traffic signal is not recommended because the low left turn volumes from Toluca Avenue would not warrant a traffic signal. Left turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

Table 4.13-6 shows the LOS conditions with implementation of the recommended mitigation improvements for specific buildable phases of the Project (see TRA-1 through TRA-3). However, it should be noted that the Existing Plus Project” scenario is not a realistic scenario under which the Project could be built (i.e., the entire Project built right now), but rather a conceptual scenario required for CEQA evaluation based on past court cases. A project would not be expected to have to fully mitigate its impacts under an Existing Plus Project scenario, but it does give the lead agency an idea of the potential “worst case” traffic impacts of a particular project. Table 4.13-6 demonstrates that building the entire Project right now (i.e., under current traffic conditions) would result in significant traffic impacts at three local intersections during at least one peak period. This is expected due to the size of the Project and current conditions of those intersections, even with the improvements proposed under the buildout scenario.

**TABLE 4.13-6
EXISTING PLUS PROJECT IMPACTS (2018) – LOCAL INTERSECTIONS –
WITH MITIGATION**

Intersection	AM Peak Hour			PM Peak Hour			Significant Impact?	
	Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
3 Merced Ave/ Sunset Ave		0.770	C		0.783	C	Yes	Yes
5 Cameron Ave/ Sunset Ave		0.820	D		0.794	C	No	Yes
6 W. Covina Pkwy/ Sunset Ave		0.749	C		0.845	D	No	Yes
8 Merced Ave/Dalewood St/Garvey Ave	17.6 ²		C	14.3 ²		B	No ³	No ³
10 Merced Ave/ California Ave		0.654	B		0.672	B	No	No
12 Cameron Ave/ Orange Ave		0.848	D		0.852	D	No	No
14 W. Covina Pkwy/ I-10 WB Ramps ¹	30.3		C	33.0		C	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = Volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 7, <i>Traffic Impact Study</i> , Psomas 2018. Impact Determination includes all mitigation recommended in TIS for all phases of Project construction								

Summary of Impacts. Even after implementing the recommended mitigation for each specific phase of the Project, there would still be significant adverse traffic impacts at the following intersections: Merced Avenue/Sunset Avenue (ROW constraints); Cameron Avenue/Sunset Avenue (PM Peak); and West Covina Parkway/Sunset Avenue (PM Peak) under the Existing Plus Project scenario, as shown in Table 4.13-6. However, this is not a realistic “buildable” scenario so specific mitigation is not identified or recommended for impacts identified under this scenario.

It should be noted that the identified improvements at Cameron Avenue/Sunset Avenue, Cameron Avenue/Orange Avenue, Merced Avenue/California Avenue, and Merced Avenue/Dalewood Street/Garvey Avenue are also applicable to impacts that occur at these four intersections in

2022, 2026, and at buildout. In those cases, the improvements would fully mitigate significant impacts at these intersections.

Caltrans Study Segments

In addition to the study intersections, the seven Caltrans study segments were evaluated for existing conditions. As shown in Table 4.13-7, all segments are shown to operate at LOS D or better. Therefore, impacts are less than significant, and no mitigation is required.

**TABLE 4.13-7
EXISTING PLUS PROJECT IMPACTS (2018) – CALTRANS SEGMENTS**

I-10 Freeway Caltrans Segment	Peak Hour Volumes (passenger cars/ hour/lane)		Level of Service (LOS)	
	Existing	Existing Plus Project	Existing	Existing Plus Project
Between I-605 & Bess Ave/Frazier St	1,236	1,243	C	C
Between Bess Ave/Frazier St & Baldwin Park Blvd	1,210	1,233	C	C
Between Baldwin Park Blvd & Francisquito Ave	1,165	1,193	B	C
Between Francisquito Ave & Puente Ave	1,575	1,616	C	C
Between Puente Ave & Pacific Ave/W. Covina Pkwy	1,602	1,636	C	C
I-10 between Pacific Ave/W. Covina Pkwy & Vincent Ave	1,722	1,745	D	D
Between Vincent Ave & Azusa Ave	1,862	1,875	D	D
Source: Table 6, <i>Traffic Impact Study</i> , Psomas 2018.				

Scenario 2: Completion of Phase 1 (2022)

Local Intersections

The next analysis scenario is for conditions after the completion of Phase 1 improvements by approximately 2022. Table 4.13-8 indicates there would be significant traffic impacts at four intersections after completion of Phase 1. As mentioned under Scenario 1 above, the highest lane delay, which occurs on the Toluca Avenue southwest shared through-left lane, is for the Cameron Avenue/Toluca Avenue intersection, as shown in Table 4.13-8. Although the highest lane delay represents a LOS F, a traffic signal is not recommended since the low left-turn volumes from Toluca Avenue would not warrant a traffic signal. Left turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

**TABLE 4.13-8
PHASE 1 COMPLETION IMPACTS (2022) – LOCAL INTERSECTIONS**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
1	Francisquito Ave/ Sunset Ave		0.789	C		0.808	D	No	No
2	Durness St/ Sunset Ave		0.681	B		0.537	A	No	No
3	Merced Ave/ Sunset Ave		0.768	C		0.771	C	No	No
4	Vine Ave/ Sunset Ave		0.656	B		0.668	B	No	No
5	Cameron Ave/ Sunset Ave		0.871	D		0.814	D	Yes	Yes
6	W. Covina Pkwy/ Sunset Ave		0.746	C		0.764	C	No	No
7	I-10 EB Ramps/ Dalewood St ¹	26.5		C	18.3		B	No	No
8	Merced Ave/Dalewood St/Garvey Ave	56.6		F	32.5		D	Yes	No
9	Merced Ave/ Orange Ave		0.564	A		0.501	A	No	No
10	Merced Ave/ California Ave		1.030	F		1.027	F	Yes	Yes
11	Merced Ave/ Glendora Ave		0.635	B		0.670	B	No	No
12	Cameron Ave/ Orange Ave		0.906	E		0.895	D	Yes	No
13	Cameron Ave/ Toluca Ave	241.9 ²		F	286.6 ²		F	No ³	No ³
14	W. Covina Pkwy/ I-10 WB Ramps ¹	49.2		D	50.0		D	No	No
15	W. Covina Pkwy/ I-10 EB Ramps ¹	10.4		B	15.0		B	No	No
16	W. Covina Pkwy/ Toluca Ave		0.473	A		0.645	B	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = Volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 8, <i>Traffic Impact Study</i> , Psomas 2018.									

Mitigation Measures

Table 4.13-8 indicates four intersections would have significant traffic impacts that require mitigation. However, implementation of the improvements outlined in Mitigation Measure TRA-1 would reduce the traffic impacts of the Project after completion of Phase 1 to less than significant levels, as shown in Table 4.13-9. Since the Merced Avenue/Dalewood Street/Garvey Avenue intersection mitigation is to convert the intersection into a TWSC configuration, the highest lane delay occurs for left-turns from Merced Avenue, as shown in Table 4.13-9. In addition, due to

right-of-way constraints, no improvements are physically feasible at Merced Avenue/Sunset Avenue.

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

- **Cameron Ave/Sunset Ave**

- Convert the outside lane on Sunset Avenue to a shared thru-right turn lane in both directions. This will require additional striping on the downstream side of the intersection in both directions and will require that parking be prohibited on Sunset Avenue within the improvement area.

- **Merced Ave/Dalewood St/Garvey Ave**

- Restripe the eastbound approach to include one thru lane and one exclusive right turn lane.
- Convert the intersection to two-way stop control, with free eastbound and westbound movements.

- **Merced Ave/California Ave**

- Restripe both approaches on Merced Avenue to include one exclusive left turn lane, one thru lane, and one shared thru-right turn lane.

- **Cameron Ave/Orange Ave**

- Restripe both approaches on Orange Avenue to include one exclusive left turn lane and a shared thru-right turn lane.

Prior to issuance of any building permits beyond Phase 1, identified improvements at these intersections will need to be physically in place to mitigate potential impacts of Project-related traffic. This measure shall be implemented to the satisfaction of the City Engineer.

**TABLE 4.13-9
PHASE 1 COMPLETION IMPACTS – LOCAL INTERSECTIONS (2022) –
WITH MITIGATION**

Intersection	AM Peak Hour			PM Peak Hour			Significant Impact?	
	Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
5 Cameron Ave/ Sunset Ave		0.790	C		0.730	C	No	No
8 Merced Ave/Dalewood St/Garvey Ave	19.2 ²		C	14.8 ²		B	No ³	No ³
10 Merced Ave/ California Ave		0.665	B		0.681	B	No	No
12 Cameron Ave/ Orange Ave		0.849	D		0.872	D	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 10, <i>Traffic Impact Study</i> , Psomas 2018.								

Summary of Impacts. Table 4.13-9 shows the significant impact evaluation with the listed mitigation measures in place. Therefore, implementation of the improvements outlined in Mitigation Measure TRA-1 would reduce traffic impacts of the Project on local intersections after completion of Phase 1 to less than significant levels.

Caltrans Segments

In addition to the study intersections, the seven Caltrans study segments were evaluated for 2022 conditions. As shown in Table 4.13-10, all segments are expected to operate at LOS C with or without the Project, therefore, there are no significant impacts, and no mitigation is required.

**TABLE 4.13-10
PHASE 1 COMPLETION IMPACTS (2022) – CALTRANS SEGMENTS**

I-10 Freeway Caltrans Segment	Peak Hour Volumes (passenger cars/hour/lane)		Level of Service (LOS)	
	Existing	Phase 1 Completion	Existing	Phase 1 Completion
Between I-605 & Bess Ave/Frazier St	1,236	1,243	C	C
Between Bess Ave/Frazier St & Baldwin Park Blvd	1,210	1,233	C	C
Between Baldwin Park Blvd & Francisquito Ave	1,165	1,193	B	C
Between Francisquito Ave & Puente Ave	1,575	1,616	C	C
Between Puente Ave & Pacific Ave/W. Covina Pkwy	1,602	1,636	C	C
Between Pacific Ave/W. Covina Pkwy & Vincent Ave	1,722	1,745	D	D
Between Vincent Ave & Azusa Ave	1,862	1,875	D	D
Source: Table 9, <i>Traffic Impact Study</i> , Psomas 2018.				

Scenario 3: Completion of Phase 2 (2026)

Local Intersections

As seen in Table 4.13-11, there are significant impacts at five intersections by the end of Phase 2 construction (2026). As was the case under Scenario 2 (2022 conditions), a traffic signal is not recommended at Cameron Avenue/Toluca Avenue because the low left-turn volumes from Toluca Avenue would not warrant a traffic signal. Left-turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

**TABLE 4.13-11
PHASE 2 COMPLETION IMPACTS (2026) – LOCAL INTERSECTIONS**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
1	Francisquito Ave/ Sunset Ave		0.829	D		0.848	D	No	No
2	Durness St/ Sunset Ave		0.715	C		0.561	A	No	No
3	Merced Ave/ Sunset Ave		0.807	D		0.810	D	No	No
4	Vine Ave/ Sunset Ave		0.694	B		0.706	C	No	No
5	Cameron Ave/ Sunset Ave		0.918	E		0.857	D	Yes	Yes
6	W. Covina Pkwy/ Sunset Ave		0.787	C		0.803	D	No	No
7	I-10 EB Ramps/ Dalewood St ¹	30.4		C	19.2		B	No	No
8	Merced Ave/Dalewood St/Garvey Ave	73.8		F	44.7		E	Yes	Yes
9	Merced Ave/ Orange Ave		0.592	A		0.523	A	No	No
10	Merced Ave/ California Ave		1.086	F		1.081	F	Yes	Yes
11	Merced Ave/ Glendora Ave		0.667	B		0.704	C	No	No
12	Cameron Ave/ Orange Ave		0.955	E		0.940	E	Yes	Yes
13	Cameron Ave/ Toluca Ave	>5 min ²		F	>5 min ²		F	No ³	No ³
14	W. Covina Pkwy/ I-10 WB Ramps ¹	62.3		E	62.6		E	Yes	Yes
15	W. Covina Pkwy/ I-10 EB Ramps ¹	11.1		B	15.5		B	No	No
16	W. Covina Pkwy/ Toluca Ave		0.496	A		0.675	B	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 11, <i>Traffic Impact Study</i> , Psomas 2018.									

As seen in Table 4.13-11, there are significant impacts at five intersections at the end of Phase 2 improvements. As previously identified under Scenario 2, a traffic signal at Cameron Avenue/Toluca Avenue is not recommended because the low left-turn volumes from Toluca Avenue would not warrant a traffic signal. Left-turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

Mitigation Measures

Table 4.13-11 indicates five intersections would have significant traffic impacts that require mitigation at the end of Phase 2 improvements. However, implementation of the improvements outlined in Mitigation Measure TRA-1 would reduce the traffic impacts of the Project after completion of Phase 2 to less than significant levels, as shown in Table 4.13-12. Since the Merced Avenue/Dalewood Street/Garvey Avenue intersection mitigation is to convert the intersection into a TWSC configuration, the highest lane delay occurs for left-turns from Merced Avenue, as shown in Table 4.13-12.

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

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

Prior to completion of construction under Phase 2, these improvements shall be physically in place to mitigate Project-related traffic impacts. This measure shall be implemented to the satisfaction of the City Engineer.

**TABLE 4.13-12
PHASE 2 COMPLETION IMPACTS – LOCAL INTERSECTIONS (2026) –
WITH MITIGATION**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
5	Cameron Ave/ Sunset Ave		0.832	D		0.767	C	No	No
8	Merced Ave/Dalewood St/Garvey Ave	21.8 ²		E	16.0 ²		C	No ³	No ³
10	Merced Ave/ California Ave		0.698	F		0.714	C	No	No
12	Cameron Ave/ Orange Ave		0.893	E		0.916	E	No	No
14	W. Covina Pkwy/I-10 WB Ramps ¹	37.4		D	39.8		D	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 13, <i>Traffic Impact Study</i> , Psomas 2018.									

Summary of Impacts. Table 4.13-12 shows the significant impact evaluation with the listed mitigation measures in place. Therefore, implementation of the improvements outlined in Mitigation Measures TRA-1 (for Phase 1) and TRA-2 would reduce traffic impacts of the Project on local intersections after completion of Phase 2 to less than significant levels.

Caltrans Segments

In addition to the study intersections, the seven Caltrans study segments were evaluated for 2026 conditions. As shown in Table 4.13-13, all segments are expected to operate at LOS C with or without the Project, therefore, there are no significant impacts, and no mitigation is required.

**TABLE 4.13-13
PHASE 2 COMPLETION IMPACTS (2026) – CALTRANS SEGMENTS**

I-10 Freeway Caltrans Segment	Peak Hour Volumes (passenger cars/hour/lane)		Level of Service (LOS)	
	Existing	Phase 2 Completion	Existing	Phase 2 Completion
Between I-605 & Bess Ave/Frazier St	1,366	1,369	C	C
Between Bess Ave/Frazier St & Baldwin Park Blvd	1,337	1,349	C	C
Between Baldwin Park Blvd & Francisquito Ave	1,288	1,302	C	C
Between Francisquito Ave & Puente Ave	1,392	1,409	C	C
Between Puente Ave & Pacific Ave/W. Covina Pkwy	1,416	1,430	C	C
Between Pacific Ave/W. Covina Pkwy & Vincent Ave	1,522	1,531	C	C
Between Vincent Ave & Azusa Ave	1,645	1,651	C	C
Source: Table 12, <i>Traffic Impact Study</i> , Psomas 2018.				

Scenario 4: General Plan and Project Buildout (2035)

Local Intersections

As shown in Table 4.13-14, there are significant impacts at eight intersections under buildout conditions of the General Plan and the proposed Project in 2035. As previously mentioned, the highest lane delay, which occurs on the Toluca Avenue southwest shared through-left lane, is shown in Table 4.13-14 for the Cameron Avenue/Toluca Avenue intersection. A traffic signal at that intersection not recommended because the low left-turn volumes from Toluca Avenue would not warrant a traffic signal. Left turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

**TABLE 4.13-14
BUILDOUT IMPACTS (2035) – LOCAL INTERSECTIONS**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
1	Francisquito Ave/ Sunset Ave		0.926	E		0.949	E	No	No
2	Durness St/ Sunset Ave		0.797	C		0.624	B	No	No
3	Merced Ave/ Sunset Ave		0.914	E		0.918	E	Yes	Yes
4	Vine Ave/ Sunset Ave		0.803	D		0.848	D	Yes	Yes
5	Cameron Ave/ Sunset Ave		1.054	F		0.990	E	Yes	Yes
6	W. Covina Pkwy/ Sunset Ave		0.895	D		0.915	E	Yes	Yes
7	I-10 EB Ramps/ Dalewood St ¹	49.6		D	25.5		C	No	No
8	Merced Ave/Dalewood St/Garvey Ave	128.4		F	90.7		F	Yes	Yes
9	Merced Ave/ Orange Ave		0.668	B		0.582	A	No	No
10	Merced Ave/ California Ave		1.232	F		1.227	F	Yes	Yes
11	Merced Ave/ Glendora Ave		0.755	C		0.791	C	No	No
12	Cameron Ave/ Orange Ave		1.083	F		1.056	F	Yes	Yes
13	Cameron Ave/ Toluca Ave	>5 min ²		F	>5 min ²		F	No ³	No ³
14	W. Covina Pkwy/ I-10 WB Ramps ¹	106.3		F	109.6		F	Yes	Yes
15	W. Covina Pkwy/ I-10 EB Ramps ¹	12.1		B	17.2		B	No	No
16	W. Covina Pkwy/ Toluca Ave		0.555	A		0.753	C	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 14, <i>Traffic Impact Study</i> , Psomas 2018.									

As seen in Table 4.13-14, there are significant impacts at eight intersections at the end of Project Buildout in 2035. As previously identified under Scenario 3, a traffic signal at Cameron Avenue/Toluca Avenue is not recommended because the low left-turn volumes from Toluca Avenue would not warrant a traffic signal. Left-turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

Mitigation Measures

Table 4.13-14 indicates eight intersections would have significant traffic impacts that require mitigation at the end of Project buildout. However, implementation of the improvements outlined in Mitigation Measure TRA-1 would reduce the traffic impacts of the Project after buildout to less than significant levels except for Vine Avenue/Sunset Avenue, as shown in Table 4.13-15. Since the Merced Avenue/Dalewood Street/Garvey Avenue intersection mitigation is to convert the intersection into a TWSC configuration, the highest lane delay occurs for left-turns from Merced Avenue, as shown in Table 4.13-15. Mitigation is therefore necessary to reduce traffic impacts at Vine Ave/Sunset Avenue under buildout conditions to less than significant levels.

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

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

Prior to certification of Project completion, these improvements shall be physically in place to mitigate Project-related traffic impacts. This measure shall be implemented to the satisfaction of the City Engineer.

**TABLE 4.13-15
BUILDOUT IMPACTS – LOCAL INTERSECTIONS (2035) – WITH MITIGATION**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM Peak	PM Peak
3	Merced Ave/ Sunset Ave		0.914	E		0.918	E	Yes	Yes
4	Vine Ave/ Sunset Ave		0.667	B		0.595	A	No	No
5	Cameron Ave/ Sunset Ave		0.954	E		0.880	D	No	No
6	W. Covina Pkwy/ Sunset Ave		0.857	D		0.877	D	No	No
8	Merced Ave/Dalewood St/Garvey Ave	34.1 ²		D	19.8 ²		C	No ³	No ³
10	Merced Ave/ California Ave		0.784	C		0.803	D	No	No
12	Cameron Ave/ Orange Ave		1.012	F		1.028	F	No	No
14	W. Covina Pkwy/I-10 WB Ramps ¹	37.4		E	69.0		E	No	No
Delay = seconds of delay; EB = Eastbound; BOLD = significant impact/condition; LOS = Level of Service; V/C = volume/Capacity WB = Westbound ¹ Caltrans Intersection ² Highest Lane Delay at TWSC Intersection ³ No significant impact because intersection delay is not defined for Two-Way Stop Control (TWSC) Source: Table 16, <i>Traffic Impact Study</i> , Psomas 2018.									

Summary of Impacts. Table 4.13-15 shows the significant impact evaluation with the listed mitigation measures in place. Implementation of the improvements outlined in Mitigation Measures TRA-1 (Phase 1), TRA-2 (Phase 2) and TRA-3 would reduce traffic impacts of the Project on local intersections after Project buildout to less than significant levels except for Merced Avenue/Sunset Avenue.

Caltrans Segments

In addition to the study intersections, the seven Caltrans study segments were evaluated for Project buildout conditions. As shown in Table 4.13-16, all segments are expected to operate at LOS C with or without the Project, therefore, there are no significant impacts, and no mitigation is required.

**TABLE 4.13-16
BUILDOUT IMPACTS (2026) – CALTRANS SEGMENTS**

I-10 Freeway Caltrans Segment	Peak Hour Volumes (passenger cars/hour/lane)		Level of Service (LOS)	
	Existing	Phase 2 Completion	Existing	Phase 2 Completion
Between I-605 & Bess Ave/Frazier St	1,366	1,369	C	C
Between Bess Ave/Frazier St & Baldwin Park Blvd	1,337	1,349	C	C
Between Baldwin Park Blvd & Francisquito Ave	1,288	1,302	C	C
Between Francisquito Ave & Puente Ave	1,392	1,409	C	C
Between Puente Ave & Pacific Ave/W. Covina Pkwy	1,416	1,430	C	C
Between Pacific Ave/W. Covina Pkwy & Vincent Ave	1,522	1,531	C	C
Between Vincent Ave & Azusa Ave	1,645	1,651	C	C
Source: Table 15, <i>Traffic Impact Study</i> , Psomas 2018.				

Summary of Timeframe Analyses. The TIS concluded that Project-related traffic impacts could be reduced to less than significant levels for all study area intersections after completion of all improvements under Phase 1, Phase 2, and Project buildout with implementation of the improvements recommended in Mitigation Measures TRA-1 through TRA-3. The only exception is the intersection of Sunset Avenue/Merced Avenue under buildout conditions (2035), which has existing physical constraints that make appropriate improvements infeasible. Therefore, this remains as a significant and unavoidable impact even after all feasible mitigation and would require a Statement of Overriding Considerations for Project approval.

In addition, even after implementing the improvements identified in Mitigation Measures TRA-1 through TRA-3, there would still be significant adverse traffic impacts at the following intersections under Existing Plus Project Conditions (2018)(Scenario 1): Merced Avenue/Sunset Avenue (ROW constraints); Cameron Avenue/Sunset Avenue (PM Peak); and West Covina Parkway/Sunset Avenue (PM Peak), as shown in Table 4.13-6. However, actual construction of the improvements outlined in TRA-1 through TRA-3 before completion of the Project would eliminate these significant impacts except for Sunset Avenue/Merced Avenue as outlined in the previous paragraph. This remaining significant impact would require adoption of a Statement of Overriding Considerations.

The TIS concluded that the Project would have no significant impacts on any of the seven Caltrans segments studied, and no mitigation is required.

Fair Share Contributions

It is anticipated that the Project would contribute its fair share towards the cost of the improvements listed in Mitigation Measures TRA-1 and TRA-2. The Project's fair share was calculated for each of the intersections requiring mitigation based on the Caltrans methodology for equitable mitigation measures, which indicates that the fair share percentage is equal to the percentage of total new trips, which would be generated by the Project. Table 4.13-17 shows the Project fair share contribution; for instances where an intersection has impacts in both peak hours, the fair share is assumed to be an average of the two peak hour calculations. If the significant impact is only in one peak hour, the fair share contribution for the intersection is equal to the percentage calculated for the affected peak hour.

**TABLE 4.13-17
PROJECT FAIR SHARE CONTRIBUTIONS**

Intersection		3	4	5	6	8	10	12	14
		Merced Ave/ Sunset Ave	Vine Ave/ Sunset Ave	Cameron Ave/ Sunset Ave	Covina Pkwy/ Sunset Ave	Merced Ave/ Dalewood St	Merced Ave/ California Ave	Cameron Ave Orange Ave	Covina Pkwy/ I-10 WB Ramps
2022 Cum. Plus Project	AM	N/A	N/A	37%	N/A	43%	24%	16%	N/A
	PM	N/A	N/A	45%	N/A	N/A	27%	N/A	N/A
	FS	N/A	N/A	41%	N/A	43%	25%	16%	N/A
2026 Cum Plus Project	AM	N/A	N/A	26%	N/A	31%	15%	10%	18%
	PM	N/A	N/A	31%	N/A	N/A	17%	3%	N/A
	FS	N/A	N/A	28%	N/A	31%	16%	7%	18%
2035 Cum. Plus Project	AM	11%	33%	21%	13%	26%	13%	9%	14%
	PM	12%	40%	26%	23%	13%	13%	3%	17%
	FS	11%	37%	23%	18%	19%	13%	6%	16%

AM = morning peak hour; PM = afternoon peak hour; FS = Fair Share Percentage; N/A = No Impact during the listed time period and/or analysis year

¹ Intersection is assumed to be built out and fair share is provided for reference only

Source: Table 17, *Traffic Impact Study*, Psomas 2018.

Vehicle Miles Traveled

The State OPR has not yet issued formal guidelines for calculating traffic impacts from projects under CEQA using vehicle miles traveled (VMT) versus LOS as a metric to determine significant impacts. It is not yet possible to provide a quantitative evaluation of VMT reductions from the Project using guidelines approved under CEQA. However, the planned expansion of this critical health care facility would improve health-related services for City residents and the area in general, which would help incrementally reduce trips by area residents to more distant health care facilities. In addition, an expanded local/community hospital would allow more local residents with the proper training to work at this hospital, thereby incrementally reducing commute trips on regional freeways. Finally, the Project would help provide additional jobs in an area that is relatively housing rich or jobs poor, so it is consistent with regional growth policies developed by SCAG. The Project's consistency with these policies is addressed in Section 4.9, *Land Use and Planning*, of this Program EIR. For these reasons, the Project would have no significant impacts relative to VMT, and no mitigation is required.

General Plan Consistency

Table 4.13-18 analyzes the consistency of the proposed Project with PlanWC goals, policies, and actions relative to traffic and transportation. The table demonstrates that the Project is consistent with PlanWC's policies and actions that relate to traffic and transportation impacts.

**TABLE 4.13-18
GENERAL PLAN CONSISTENCY**

General Plan Policies and Actions	Consistency Analysis
Our Accessible Community	
Policy 4.1 Coordinate and integrate land use, economic and transportation planning policies.	Consistent. The hospital expansion Project would allow for continued access via cars, bicycles, and walking as needed.
Action 4.1 Adopt a new land-use oriented system of street classifications as described in the Citywide Thoroughfare Plan.	Consistent. The Project is adjacent to two major streets that provide primary access for City residents consistent with the Thoroughfare Plan.
Policy 4.2 Accommodate multimodal mobility, accessibility and safety needs when planning, designing, and implementing transportation improvements, improving access and circulation for all users of City streets.	Consistent. The hospital expansion Project would allow for continued access for workers and patients via cars, bicycles, and walking as needed.
Action 4.2a Adopt and apply transportation system performance metrics as described in the Thoroughfares Plan.	Consistent. A detailed Traffic Impact Study (TIS) was prepared for the proposed Project, which includes a quantified analysis of impacts related to LOS as well as a qualitative analysis of VMT.
Action 4.2c Accommodate the needs of all travelers through a Complete Streets approach to designing new transportation improvements. Complete streets are roadways designed to facilitate safe, comfortable, and efficient travel for all roadway users.	Consistent. The Project is adjacent to two major streets that provide primary access for City residents consistent with the City's General Plan and Citywide Thoroughfare Plan.
Policy 4.3 Establish protection of human life and health as the highest transportation system priorities, and seek to improve safety through the design and maintenance of streets, sidewalks, intersections and crosswalks.	Consistent. The Project would construct various improvements to protect the health and safety of area residents, and would provide streets, driveways, sidewalks, etc. to facilitate safe access to the Project site.
Policy 4.11 To ensure that the City is prepared for future changes in transportation technologies and preferred modes of travel, seek to incorporate emerging mobility options such as Transportation Network Companies (TNC) and autonomous vehicles into planning and other efforts.	Consistent. The QVHSP allows for new types of transportation modes and would create a more centralized entry with improved vehicular circulation and parking.
Action 4.11a Understanding that increased adoption of TNCs and future introduction of autonomous vehicles may reduce parking needs, seek to limit the scale of investments in expensive parking infrastructure (parking structures). Consider investing instead in surface parking lots and on-street spaces that can be more easily repurposed for other needs.	Consistent. At the present time the QVHSP calls for up to two new parking structures to support expanded health care services at the hospital. If it is determined one or both of these are not needed or should be modified in design, the QVHSP allows for changes in the future to accommodate changing societal conditions.
Our Healthy and Safe Community ("Active Living" sub-section)	
Policy 6.1 Promote and support transportation decisions that reduce driving and increase rates of transit use, walking, and biking.	Consistent. The Project would allow the hospital to provide expanded health care services including wellness and healthy living choices for patients and workers which may include but are not limited to use of transit, walking, or bicycling to work.

Construction-Impact Analysis

Construction of the proposed Project would generate temporary trips associated with construction activities, as described in Section 3.6.5, *Grading and Construction Activities*, of this Program EIR. It is anticipated that construction of the proposed Project would be initiated in 2019 and would be phased over the next 10–15 years as funds become available for improvements. Construction-related traffic would primarily be associated with delivery of building materials and construction

equipment, removal of demolition and construction debris, and construction workers commuting to/from the Project site. The amount of construction traffic would vary daily depending on the nature of the activity. In general, phased construction of the proposed improvements is not anticipated to result in substantial construction-related trip volumes, including heavy truck trips, except possibly for the initial demolition and clearing stages, which could generate the highest number of heavy truck trips (refer to the tables in Section 3.8, Project Description). Earthwork for the Project overall is expected to be generally balanced onsite with limited import or export of soil. However, construction of individual phases of the Project may require some import or export of soil during grading. For example, site clearing and demolition of the three existing buildings during the Immediate Improvements phase of work could require the export of soil, waste or non-recyclable building materials although at this time the volume of such materials is unknown.

To minimize traffic impacts during construction (i.e., to prevent them from becoming significant), a Traffic Control Plan (TCP) would be prepared (see Mitigation Measure TRA-4) and submitted to the City for review and approval prior to the start of major construction activities. This plan would describe safe detours, provide temporary traffic-control measures during construction activities, and identify requirements to be met when one or more travel lanes are obstructed during construction. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following activities: implementing temporary traffic controls (e.g., a flag person) during all phases of construction to maintain smooth traffic flow; implementing signage for detours, if needed; assigning dedicated turn lanes for movement of construction trucks and equipment on and off the site; scheduling construction activities that affect traffic flow on the arterial system to off-peak hours; consolidating truck deliveries; rerouting construction trucks away from congested streets or sensitive receptors; and synchronizing signals to improve traffic flow.

Construction work associated with the driveways, sidewalks, parkways, curbs and gutters, and the public rights-of-way would also require an encroachment permit from the City of West Covina to ensure that obstruction of City streets during construction activities is minimized and that public facilities are returned to their original conditions unless otherwise improved. The TCP would be used to determine the necessary temporary traffic-control devices in and near construction work areas.

Mitigation Measures

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

Summary of Impact. Conducting construction activities in compliance with the TCP outlined in TRA-4 would reduce temporary construction-related traffic impacts to a less than significant level.

Parking

In recent years parking was removed from the State CEQA Guidelines Checklist (i.e., Appendix G) for consideration on typical kinds of urban and suburban development projects. However, parking may be evaluated in a CEQA document when there are specific issues or concerns as were raised by local residents during the NOP period. They expressed concern that if the hospital did not provide adequate parking during and after construction, hospital workers or visitors might park in their neighborhoods. In addition to the Traffic Impact Study (TIS), a Parking Study was prepared for the proposed Project to assure the Project site would have adequate parking during its expansion and would not result in significant parking impacts on nearby residents. Table 4.13-19 compares the parking generation rates for the existing hospital campus and from the West Covina Municipal Code.

**TABLE 4.13-19
COMPARISON OF PARKING RATES**

Source	Land Use	Average Parking Demand (vehicles)	Parking Unit
Municipal Code	Hospital	1.50	Per bed
	Medical and Dental Office <20,000 SF	6.67	Per 1,000 SF
	Medical and Dental Office >20,000 SF	5.00	Per 1,000 SF
Existing Hospital Campus	Hospital	2.56	Per bed
	Medical Office	3.38	Per 1,000 SF
SF = square feet Source: Table 4, <i>Parking Study</i> , Psomas 2018.			

As seen in Table 4.13-19, existing uses at the Queen of the Valley Hospital require more parking spaces than what are currently required under the City Municipal Code, but the existing medical office uses need significantly fewer parking spaces than what are required by the City Municipal Code. Future parking needs are estimated based on the minimum parking requirements in the West Covina Municipal Code as well as the parking generation rates that were calculated for the existing campus. Table 4.13-20 shows the number of parking spaces needed at the end of each phase based on each set of parking generation rates. As shown in the table, approximately 2,255 parking spaces would be required based on existing parking demand when all phases of the Project are completed. Overall, the number of parking spaces required by the Municipal Code is lower than the estimated parking spaces based on existing parking demand.

**TABLE 4.13-20
ESTIMATED PARKING DEMAND**

Phase		Number ¹ of Beds or SF	Parking Spaces Needed (End of Phase)	
			Municipal Code	Existing Campus
Land Use - Hospital				
Existing (2018)		325 beds	488	833
Phase 1 (2022)	Phase 1A	33 beds	50	85
	Phase 1B	382 beds	573	979
Phase 2 (2026)		382 beds	573	979
Buildout (2028+)		525 beds	788	1,345
Lane Use – Medical Office				
Existing (2018)		89 KSF	444	301
Phase 1 (2022)	Phase 1A	89 KSF	444	301
	Phase 1B	179 KSF	894	605
Phase 2 (2026)		179 KSF	894	605
Buildout (2028+)		269 KSF	1,344	910
Total – All Land Uses				
Existing (2018)			932	1,134
Phase 1 (2022)			1,467	1,584
Phase 2 (2026)			1,467	1,584
Buildout (2028+)			2,132	2,255
SF = square feet				
¹ The number of total beds or thousand square feet (KSF) of building at the end of the particular phase.				
Source: Table 4, <i>Parking Study</i> , Psomas 2018.				

In addition, Table 4.13-21 complementary to Table 4.13-20, Table 4.13-21 shows the number of parking spaces needed at the start and end of each phase, since parking is expected to be lost at the start of each phase due to construction of new buildings and/or construction of parking structures. Note that the number of lost parking spaces is estimated based on the assumed sizes of the buildings and parking structures as well as estimated area needed for construction staging and access.

**TABLE 4.13-21
PARKING NEEDS AND SPACES PROVIDED**

Phase	Changes		QVHSP Parking Spaces	Required Spaces		Surplus/Deficit	
	Campus Improvements	# of Spaces		Municipal Code	Existing Campus	Municipal Code	Existing Campus
Existing (2018)	N/A	N/A	1,365	932	1,134	433	231
Immediate Improvements	Add surface parking	+350	1,715	932	1,134	783	581
Start of Phase 1 (2020)	Expand surface parking, new ER, new ICU, central plant expansion, new MOB, new parking structure	0	1,715	932	1,134	783	581
End of Phase 1 (2022)		+400	2,115	1,467	1,584	648	531
Start of Phase 2 (2022)	New hospital tower, central plant expansion	-100	2,015	1,467	1,584	548	431
End of Phase 2 (2026)		0	2,015	1,467	1,584	548	431
Start of Buildout (2028)	New MOB, new parking structure, new hospital tower building	0	2,015	1,467	1,584	548	431
Buildout (+2028)		+400	2,415	2,132	2,255	283	160
N/A = Not Applicable; ER = Emergency Room; ICU = Intensive Care Unit; MOB = Medical Office Building							
Source: Table 4, <i>Parking Study</i> , Psomas 2018 and Table 3-5, Planned Hospital Parking by Phase (EIR Project Description).							

As seen in Table 4.13-21, there is expected to be a sufficient number of parking spaces through buildout of Project construction. While it is estimated the campus will have sufficient parking based on the Municipal Code parking requirements, existing activities on the hospital campus indicate that actual parking demand may differ somewhat from the amount required by the Code.

With all the planned improvements phased over a long period of time, it would be necessary to carefully plan how much parking in various locations are provided so employees, visitors, and others would have sufficient parking onsite during and after Project construction. This is a potentially significant impact that requires mitigation.

Mitigation Measures

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

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

TRA-6 Prior to the start of any phase of Project improvements that contains a parking structure, the Queen of the Valley Hospital shall provide documentation as to the location, need, and appropriate size of the structure, to the satisfaction of the City Engineer and the City Planning Department.

- TRA-7** Any parking structure constructed as part of the Project shall be opened and available for parking prior to the completion of the phase within which it is being constructed.
- TRA-8** During all phases of construction, signs shall be posted, and information placed on the Queen of the Valley Hospital's website on where complaints regarding parking, noise, etc. during construction should be directed. The Queen of the Valley Hospital shall make a good faith effort to resolve complaints by local neighbors regarding parking or other construction-related issues.
- TRA-9** During all phases of Project construction, the Queen of the Valley Hospital shall provide sufficient onsite or designated offsite parking for construction workers to prevent parking in adjacent residential areas. Construction workers will be given information in writing on specific parking locations they can use if offsite parking is needed. This measure shall be implemented to the satisfaction of the Planning Department.
- TRA-10** At least twice a year the Queen of the Valley Hospital shall provide printed information to its employees regarding carpooling and ridesharing. Copies of this information shall be transmitted to the City Planning Department.

Summary of All Threshold 13.1 and 13.2 Impacts. With implementation of Mitigation Measures TRA-1 through TRA-9, the proposed Project would have less than significant impacts regarding traffic impacts during all phases of construction and operation, parking, and General Plan consistency except for the following:

- Even after implementing TRA-1 through TRA-3, there would still be significant adverse traffic impacts at the following intersections: Merced Avenue/Sunset Avenue (ROW constraints); Cameron Avenue/Sunset Avenue (PM Peak); and West Covina Parkway/Sunset Avenue (PM Peak), as shown in Table 4.13-6. These impacts would require adoption of a Statement of Overriding Considerations.

NOTE: This analysis also determined that the following intersections had significant impacts under the Existing Plus Project scenario: (1) Merced Avenue/Sunset Avenue (ROW constraints); (2) Cameron Avenue/Sunset Avenue (PM Peak); and (3) West Covina Parkway/Sunset Avenue (PM Peak), as shown in Table 4.13-6. However, the Existing Plus Project analysis represent a theoretical condition and is not an actual building scenario, therefore it does not require mitigation

Threshold 13.3	Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
Threshold 13.4	Would the project result in inadequate emergency access?

Hazardous Design Features. The main vehicular Project site access would be via Sunset Avenue at Vine Street with secondary access via Merced Avenue at the southwest corner of the site. The Project site has direct access off of two major arterials with linear alignments (i.e. no curves) adjacent to the Hospital property. The site and immediate surrounding area do not contain any roadway or other design features, which are or would produce significant traffic hazards. Therefore, the Project would not have any significant impacts in this regard, and no mitigation is required.

Emergency Vehicle Access: This topic addresses the adequacy of emergency vehicle access to/from the Project site. There is a critical public need to provide access by police, fire, and other emergency vehicles into the Project site. Providing adequate emergency vehicle access ensures that these vehicles are able to easily and quickly respond to service calls as well as ambulance service directly to the emergency room and other hospital facilities. The Project is located adjacent to two major roadways and has relatively direct freeway access (i.e., Sunset Avenue to the I-10 Freeway). Regional access is therefore considered to be sufficient.

A review of the site plan indicates that emergency vehicles can access the site at two points, the main hospital entrance at Sunset Avenue/Vine Street and a secondary access on Merced Avenue at the northwest corner of the site. Therefore, emergency vehicle access is sufficient for the existing and future needs of the hospital, there would be no significant impacts in this regard, and no mitigation is required.

Threshold 13.5	Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?
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The Specific Plan encourages the use of non-vehicular transportation, which is readily available in the Project area, as outlined in Section 4.13.3, *Existing Setting, Alternative Transportation Facilities*, above. Both Sunset Avenue and Merced Avenue in the vicinity of the Project site have curb-adjacent sidewalks and bike lanes (Class II on Sunset, Class III on Merced). Commuter rail is available at the Metrolink Station in Baldwin Park 1.5 miles northwest of the hospital. Bus service to the Project area is provided by Foothill Transit via its Routes 272 and 281, which have stops adjacent to the Project site. The City also operates a separate “Go West” shuttle bus service consisting of three shuttle routes, labeled Red, Blue and Green.

Section 3.3 of the QVHSP is the Circulation Plan, which addresses vehicular circulation (3.3.1 and 3.3.2), mass transit connections (3.3.3, rail and bus), and pedestrian circulation (3.3.4). Table 4.13-18 also demonstrates that the Project is consistent with the goals and policies of PlanWC relative to alternative transportation. As shown, the Project would not conflict with adopted policies regarding alternative (i.e., non-vehicular) transportation, so there are no impacts in this regard, and no mitigation is required.

Threshold 13.6	Would the project result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks?
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The closest airport to the Project site is the El Monte Airport located at 4233 Santa Anita Avenue, El Monte, which is 5.1 miles northwest of the hospital property. Current activities at the hospital do not influence air traffic patterns at El Monte or any other airport in the region. The only possible future activity that could affect air traffic patterns would be if the hospital decides to implement air ambulance service involving helicopters. If that occurs, the Queen of the Valley Hospital would be required to prepare separate planning and CEQA documentation including consultation and coordination with the Los Angeles County Department of Regional Planning and the County's Airport Land Use Commission. At this time, impacts of the proposed Project relative to air traffic patterns would be less than significant, and no mitigation is required.

4.13.6 CUMULATIVE IMPACTS

Cumulative traffic impacts consider the impacts of future growth and development in the City on the roadway system serving the Project area as well as non-vehicular transportation services. A

detailed quantitative analysis of Project traffic impacts under General Plan and Project buildout conditions was discussed in Section 4.13.5, Environmental Impacts, Thresholds 13-1 and 13-2. As identified in that analysis, the proposed Project would result in a significant and unavoidable cumulative impact under Buildout Conditions (2035) at the intersection of Sunset Avenue/Merced Avenue, even with implementation of Mitigation Measures TRA-1 through TRA-3. There is insufficient right-of-way to accommodate the required improvements at this intersection; therefore, the proposed Project would contribute to this cumulatively considerable traffic impact. The Project would have less than significant impacts related to the other transportation and traffic issues evaluated in Section 4.13.5 above, and so would not result in any significant cumulative impacts related to these other transportation issues, and no additional mitigation is required.

4.13.7 IMPACTS OF MITIGATION MEASURES

The recommended Mitigation Measures TRA-1 through TRA-3 would require that certain traffic improvements eventually be made but are not expected to result in significant traffic or other environmental impacts in and of themselves. The implementation of Mitigation Measures TRA-4 through TRA-10 address potential construction impacts and may incrementally delay some construction activities but are not expected to result in any significant environmental impacts.

4.13.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Even with the implementation of Mitigation Measures TRA-1 through TRA-10, the Project would have direct and cumulative traffic impacts on the intersection of Sunset Avenue/Merced Avenue, as there is insufficient right-of-way to accommodate the necessary improvements. Therefore, this one operational traffic impact would remain significant and unavoidable and would require a Statement of Overriding Considerations.

4.13.9 REFERENCES

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4.14 TRIBAL CULTURAL RESOURCES

This section evaluates the proposed Project's potential to have adverse effects on Native American (NA) tribal resources. Responses to the City's correspondence regarding NA consultation under Assembly Bill (AB) 52 and Senate Bill (SB) 18 and are included in Appendix E of this Program EIR.

There were no comments by agencies or public during the Notice of Preparation (NOP) period or at the scoping meeting that dealt with tribal cultural resources.

4.14.1 RELEVANT POLICIES AND REGULATIONS

State

Assembly Bill 52

In September 2014, Governor Brown signed AB 52 (Chapter 532, Statutes of 2014), which creates a new category of environmental resources that must be considered under the California Environmental Quality Act (CEQA): "tribal cultural resources." The legislation imposes new requirements for offering to consult with California Indian Tribes regarding projects that may affect a tribal cultural resource, emphasizes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures. Recognizing that tribes may have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 is applicable to the project and NA tribes listed on the City of West Covina's consultation list have been notified of the Project and offered consultation.

Senate Bill 18

Senate Bill 18 requires cities and counties to contact and consult with California NA Tribes on an official contact list maintained by the California Native American Heritage Commission (NAHC). Before adopting or amending a General Plan, Specific Plan, or when designating land as open space, a city must contact local NA representatives to protect NA cultural places and resources. The SB 18 is applicable to this proposed Project (i.e., a new specific plan) and the City has contacted local NA tribal representatives to determine if they wish to consult with the City on the proposed Project.

California Health and Safety Code (Sections 7050.5, 7051, and 7054)

These sections of the *California Health and Safety Code* collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the *California Public Resources Code*). These sections also address the disposition of NA burials in archaeological sites and protect such remains from disturbance, vandalism, or inadvertent destruction. Procedures to be implemented are established for (1) the discovery of NA skeletal remains during construction of a project; (2) the treatment of the remains prior to, during, and after evaluation; and (3) reburial.

Section 7050.5 of the *California Health and Safety Code* specifically provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

California Public Resources Code (Section 5097.98)

Section 5097.98 of the *California Public Resources Code* states that, if remains are determined by the Coroner to be of NA origin, the Coroner must notify the NAHC within 24 hours. When the NAHC receives notification of a discovery of NA human remains from a County Coroner, it shall immediately notify those persons it believes to be most likely descended from the deceased NA. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the NA human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. This regulation also requires that, upon the discovery of NA remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the NA human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations and all reasonable options regarding the descendants' preferences for treatment. This section of the *California Public Resources Code* has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

City of West Covina

The City's General Plan (PlanWC) (West Covina 2016a), "Our Creative Community" Section, Sub-Section D, Celebrate and Promote West Covina's Cultural Assets, contains the following policy and action:

Policy 7.7 Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and Assembly Bill 52 and Senate Bill 18 for consultation with Native American tribes for development projects carried out within the City.

Action 7.7 Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

The City's Municipal Code does not contain any specific sections or codes relative to cultural or archaeological resources.

4.14.2 METHODS

Two pieces of State legislation, AB 52 and SB 18 , require the City as the Lead Agency under CEQA to consult with interested NA tribal representatives regarding the proposed Project. On August 1, 2018 the City sent formal written notices to 15 tribal representatives requesting consultation under SB 18, and on August 8, 2018 sent notices to two tribal representatives that had previously requested notice of projects under AB 52. Table 4.14-1 presents the results of the tribal consultation noticing process.

4.14.3 EXISTING SETTING

The City of West Covina and the Project area are within the ancestral territory of the Gabrielino/Tongva Indians. During prehistoric times, the area was occupied by the Gabrielino/Tongva as early as 500 BC in large, permanent villages in the fertile lowlands along rivers and streams and in sheltered areas along the coast. The Gabrielino/Tongva were hunter-gatherers and their territory eventually encompassed the greater Los Angeles Basin including the coast. They processed food resources in a variety of ways: nuts were cracked with hammer stone and anvil; acorns were ground with mortar and pestle; and seeds and berries with mano and metate. Yucca, an important resource in many areas, was eaten by the natives and exploited for its fibers. Their houses were circular domed structures of willow poles thatched with tule and were quite large, they could, in some cases, hold fifty individuals. Population estimates for the Gabrielino/Tongva are estimated around 10,000 individuals prior to European contact.¹

The City contacted 15 total tribal representatives representing 11 different tribal groups regarding consultation with the City on the proposed Project, pursuant to both SB 18 and AB 52. Table 2-2 lists the various tribes and representatives contacted by the City to determine which groups desired to consult with the City. Under SB 18, tribal groups have 90 days to indicate if they want to consult on a particular project, while tribes under AB 52 have 30 days to indicate a desire to consult.

¹ Summarized from Sutton, M et al 2009, 2010, 2011a, 2011b, and 2011c and Wallace 1955.

**TABLE 4.14-1
NATIVE AMERICAN TRIBAL CONSULTATION**

Tribal Group	Date	Contact(s)/Comments	Requirement
Gabrielino/Tongva Tribe	8-1-18	Charles Alvarez – no response	SB 18
Gabrielino/Tongva Nation	8-1-18	Sandonne Guad – no response	SB 18
Gabrielino/Tongva San Gabriel Band of Mission Indians	8-1-18	Anthony Morales – no response	SB 18
Gabrielino Band of Mission Indians – Kizh Nation	8-1-18 and 8-8-18	Andrew Salas/Brandy Salas – Letter dated 8-16-18 indicating a desire to consult, then a follow-up email dated 9-27-18 indicating a decision not to consult unless artifacts were found during grading.	SB 18 and AB 52
Barbareno/Ventureno Band of Mission Indians	8-1-18	Raudel Banuelos, Jr. – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Elenor Arrellanes – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Patrick Turnamait – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Julie Turnamait-Stenslie – no response	SB 18
San Manuel Band of Mission Indians	8-1-18	Lynn Valbuena -no response	SB 18
San Manuel Band of Mission Indians	8-1-18	Lee Claus – no response	SB 18
Soboba Band of Luiseno Indians	8-1-18 and 8-8-18	Joseph Ontiveros – no responses	SB 18 and AB 52
Kitanemuk & Yowlumne Tejon Indians	8-1-18	Delia Dominguez – no response	SB 18
Kern Valley Indian Community	8-1-18	Robert Robinson – no response	SB 18
Fernandeno Tatviam Band of Mission Indians	8-1-18	Rudy Ortega, Jr. – no response	SB 18
Santa Ynez Band of Chumash Indians	8-1-18	Kenneth Kahn – no response	SB 18
NOTE: SB 18 notice to consult period ended October 30 and AB 52 notice to consult period ended August 31. Source: City of West Covina Planning Department (see Appendix B)			

4.14.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on tribal cultural resources if it will do any of the following:

- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.14.5 ENVIRONMENTAL IMPACTS

Threshold 14.1	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.
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General Plan Consistency

The, “Our Creative Community” Section of PlanWC, Sub-Section D, Celebrates and Promotes West Covina’s Cultural Assets, and it contains the following policy and action regarding tribal resources:

Policy 7.7 Assess, avoid, and mitigate potential impacts to archeological, paleontological, and tribal resources through the CEQA review process for development projects carried out within the City. Comply with existing regulations relating to Native American resources, including California Environmental Quality Act Section 15064.5(d) and (e) and Public Resources Code §5097.98 concerning burial grounds, and Assembly Bill 52 and Senate Bill 18 for consultation with Native American tribes for development projects carried out within the City.

Action 7.7 Require development to avoid archaeological and paleontological resources, whenever possible. If complete avoidance is not possible, require development to minimize and fully mitigate the impacts to the resources. Notify California Native American tribes and organizations of proposed projects that have the potential to adversely impact cultural resources.

The City’s Municipal Code does not contain any specific sections or codes relative to tribal cultural resources.

As indicated by the West Covina General Plan EIR (West Covina 2016b), there are no known archaeological or tribal cultural sites located within the Project area or in the immediately surrounding area. According to available information, the potential for Project-related grading to have significant impacts on archaeological or tribal cultural resources is considered low; however, there is a possibility that unknown archaeological or tribal cultural resources may be encountered during grading. This is a potentially significant impact that requires mitigation, consistent with PlanWC Policy 7.7 and Action 7.7.

It should be noted that four mitigation measures previously identified in Section 4.4, *Cultural Resources*, are directly applicable to potential impacts related to tribal cultural resources.

California Register of Historic Places Listing

The California Environmental Quality Act requires a lead agency to determine whether a project would have a significant effect on one or more historical resources. According to Section 15064.5(a) of the State CEQA Guidelines, a “historical resource” is defined as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC Section 21084.1); a resource included in a local register of historical resources (14 *California Code of Regulations* [CCR], Section 15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR Section 15064.5[a][3]). The California Register of Historic Places (CRHP) database does not indicate any archaeological or historic resources within West Covina; however, the City has listed 31 built structures, which it considers historically significant in a survey commissioned by the City (City of West Covina 2006). These resources are considered eligible to be listed on the CRHP based on local significance. Of these 31 structures, one property, 1127 West Merced Avenue, is located within a half mile of the Project area. The structure is a two-story farmhouse built in 1909. The structure contains local significance for embodying the distinctive characteristics of early 20th century farmhouse architecture. None of these structures are within or immediately adjacent to the Project site, so criteria (a) under Threshold 15.1 is not met; therefore, there are no significant impacts in this regard, and no mitigation is required.

Tribal Consultation Requirements

After the close of the 90-day noticing period under SB 18 and the 30-day noticing period under AB 52, no tribal groups expressed a desire to consult with the City on the proposed Project, but one group asked to be contacted if any tribal cultural resources or artifacts were found during grading (see Table 4.14-1).

Native American Burials

Finally, regarding human remains that may be of NA origin, the following was previously presented in Section 4.4, *Cultural Resources*, Sub-Section 4.4, Threshold 4.4:

If human remains are found, state law requires proper treatment for the remain in accordance with applicable regulations. Sections 7050.5–7055 of the *California Health and Safety Code* describe the general provisions for dealing with human remains. Specifically, Section 7050.5 of the *California Health and Safety Code* describes the protocols to be followed in the event that human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. Although there is no indication that human remains are present within the Project area, Project-related grading has the potential to unearth previously undiscovered human remains. This represents a potentially significant impact that requires mitigation consistent with state regulations.

In Section 4.4 Mitigation Measure CUL-5 was recommended to address potential impacts if human remains that were of NA origin were found during Project grading, as shown below.

Previous Mitigation Measures (Section 4.4)

The following measures were previously outlined in Section 4.4 regarding Cultural Resources but are repeated here for the reader's ease of reference:

CUL-1 A qualified archaeologist (the "Project Archaeologist") shall be retained prior to the start of grading for Project-related construction. The Project Archaeologist shall monitor all ground-disturbing activities within the areas of native soil (i.e., below existing areas of artificial fill from previous hospital construction). If archaeological or historical resources are encountered during implementation of any phase of the Project, the Project Archaeologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity of the find in order to make an evaluation of the find. If historical materials are found during grading, a qualified historian ("Project Historian") shall be retained to evaluate and make appropriate recommendations on the disposition of any historical artifacts in consultation with the City local historical experts as determined appropriate by the City. The disposition of any archaeological resources shall be governed by Mitigation Measure CUL-3.

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

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

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

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

The Hospital shall relinquish ownership of all archaeological artifacts that are of Native American origin found on the Project site to the culturally affiliated Native American tribe(s) for proper treatment and disposition. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City Planning Department, the appropriate Native American tribe(s), and the South Central Coastal Information Center. All cultural material,

excluding sacred, ceremonial, grave goods and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the Project site shall be curated, as determined by the treatment plan, according to the current professional repository standards and may include a culturally affiliated tribal curatorial facility.

- CUL-5** If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code*. The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner.

The proposed Project has a low potential to impact unknown tribal cultural resources with implementation of Mitigation Measures CUL-1 through CUL-3 and CUL-5. However, implementation of the additional measure would help assure that potential impacts to tribal cultural resources are reduced to the greatest extent feasible for the proposed Project:

(Additional) Mitigation Measures

- TCR-1** Prior to the start of grading for each phase of the Project, the Queen of the Valley Hospital shall enter into a Cultural Resources Monitoring Agreement with qualified Tribal representatives, and that a professional archaeological monitor meeting Secretary of Interior standards has been retained to conduct monitoring of all grading activities and has the authority to temporarily halt and redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist and Tribal representatives shall attend any pre-grading meetings with the City and contractors to explain and coordinate the requirements of the monitoring program for each phase of Project work as appropriate.
- TCR-2** During all Project-related grading activities, the City, Queen of the Valley Hospital representatives, Project Archaeologist, and the Tribal representative(s) shall be allowed to monitor and have received a minimum of 30 days advance notice of all grading and trenching activities. The Project Archaeological Monitor shall observe all mass grading and trenching activities per the Cultural Resources Monitoring Agreement. If the Tribal representatives suspect that an archaeological resource may have been unearthed, the archaeologist, in consultation with the tribal representative, shall immediately halt and redirect grading operations in a 100-foot radius around the find to allow identification and evaluation of the suspected resource. In consultation with the appropriate Native American Tribe(s), the

archaeological monitor shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2.

Summary of Impact. The proposed Project has a potential to impact unknown tribal cultural resources but implementation of Mitigation Measures CUL-1 through CUL-5 and TCR-1 through TCR-2 would reduce this impact to a less than significant level, consistent with PlanWC policies and actions.

4.14.6 CUMULATIVE IMPACTS

Direct impacts to any tribal cultural resources would be site specific although a tribal cultural landscape feature might extend over a larger geographical area. The proposed Project could lead to accelerated degradation of previously unknown historical, archaeological, and paleontological resources. As such, impacts may be considered cumulative simply because they relate to the loss of cultural resources in general over time throughout the region. Based on the National Register, there are no cultural resources listed or determined eligible for listing. However, the Project and its surrounding area may contain unknown resources. Should unknown resources be identified, ground disturbance activities could lead to the accelerated degradation of significant cultural resources. In addition, local tribes and appropriate tribal representatives would continue to be consulted and included early in the CEQA process for projects under SB 18 and/or AB 52, as appropriate. With these processes in place, potential impacts to tribal resources can be kept at less than significant levels, which would include implementing appropriate mitigation on a project by project basis, similar to those measures recommended for the proposed Project.

4.14.7 IMPACT OF MITIGATION MEASURES

Implementation of Mitigation Measures CUL-1 through CUL-5 and TCR-1 and TCR-2 have the potential to delay grading and construction of Project-related improvements but would not in and of themselves result in any significant impacts that have not already been identified and analyzed in this Program EIR.

4.14.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potential Project-related impacts to tribal cultural resources would be reduced to less than significant levels after implementation of the recommended mitigation measures CUL-1 through CUL-5 and TCR-1 through TCR-2.

4.14.9 REFERENCES

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4.15 UTILITIES AND SERVICE SYSTEMS

This section describes the existing utilities and service systems that serve the proposed Project; addresses potential Project impacts on the availability and capacity of infrastructure and other facilities; addresses water supply availability; and addresses the potential physical environmental impacts associated with installation of infrastructure.

The Energy Conservation (pursuant to Appendix F of the California Environmental Quality Act [CEQA] Guidelines) is discussed in Section 6, Other CEQA Considerations, of this Program EIR.

There was one comment letter received from the Los Angeles County Sanitation District (LACSD) related to utilities and service systems submitted during the Notice of Preparation (NOP) period or as a result of the Scoping Meeting. The comment addressed sewerage services for the proposed QVHSP.

4.15.1 RELEVANT POLICIES AND REGULATIONS

State

Urban Water Management Planning Act

The California Urban Water Management Planning Act (*California Water Code*, Sections 10610–10656) requires urban water suppliers that provide over 3,000 acre-feet (af) of water annually or serve more than 3,000 or more connections to analyze the reliability of their water sources over a 20-year planning horizon. The Act requires urban water suppliers to prepare and update Urban Water Management Plans (UWMPs) that analyze the availability of water supplies to meet demands during normal, single-dry, and multiple-dry years, to encourage water conservation programs and create long-term planning obligations.

Water Conservation Act of 2009/Senate Bill 7

The Water Conservation Act of 2009 or Senate Bill 7 (SB X7-7) was approved in November 2009 and requires urban water retail suppliers in California to reduce per capita water use by at least ten percent on or before December 31, 2015, and to achieve a 20 percent reduction by December 31, 2020. In their 2010 Urban Water Management Plans, urban retail water suppliers must include the baseline daily per capita water use, urban water use target, interim urban water use target, and compliance daily per capita water use, along with the bases for determining those estimates and references to the supporting data. Urban wholesale water suppliers must also include an assessment of present and proposed water conservation measures, programs, and policies needed to achieve the water use reductions required by this Act. While it does not require existing customers to undertake changes in product formulation, operations, or equipment that would reduce process water use, suppliers may provide technical assistance and financial incentives to those customers to implement efficiency measures for process water.

Urban retail water suppliers and agricultural water suppliers would not be eligible for State water grants or loans for surface water or groundwater storage, recycling, desalination, water conservation, water supply reliability, and water supply augmentation unless they comply with the water conservation requirements established by this Act.

20x2020 Water Conservation Plan

The 20x2020 Water Conservation Plan, issued by the California Department of Water Resources (DWR) in 2010 pursuant to SB X7-7, established a water conservation target of 20 percent reduction in water use by 2020 compared to 2005 baseline use.

Executive Orders for Drought State of Emergency

In April 2014, Governor Brown proclaimed a continued state of emergency and asked that the State strengthen its ability to manage water and habitat effectively in drought conditions. He directed the DWR and SWRCB to expedite approvals of voluntary water transfers to assist farmers. He also directed the California Department of Fish and Wildlife to accelerate monitoring of drought impacts on winter-run Chinook salmon in the Sacramento River and its tributaries and to execute habitat restoration projects that will help fish weather the ongoing drought. In response to the increased threat of wildfire season, he called for streamlined contracting rules for the Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection to purchase equipment and allowed landowners to quickly clear brush and dead, dying, or diseased trees that increase fire danger.

In April 2014, the Governor proclaimed a continued state of emergency and asked that the State strengthen its ability to manage water and habitat effectively in drought conditions. He directed the DWR and SWRCB to expedite approvals of voluntary water transfers to assist farmers. He also directed the California Department of Fish and Wildlife (CDFW) to accelerate monitoring of drought impacts on winter-run Chinook salmon in the Sacramento River and its tributaries and to execute habitat restoration projects that will help fish weather the ongoing drought. In response to the increased threat of wildfire season, he called for streamlined contracting rules for the Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection (CAL FIRE) to purchase equipment and allowed landowners to quickly clear brush and dead, dying, or diseased trees that increase fire danger.

The Governor also called on all Californians to redouble their efforts to conserve water and to take specific actions to avoid wasting water, including limiting lawn watering and car washing; he recommended that schools, parks, and golf courses limit the use of potable water for irrigation; and he asked that hotels and restaurants give customers options to conserve water by only serving water upon request and other measures. He also prevented homeowner associations from fining residents that limit their lawn watering.

In December 2014, Executive Order B-28-14 extended the Governor's January 2014 and April 2014 proclamations and extended the operation of the provisions in these proclamations to May 2016.

On April 1, 2015, in response to historically dry conditions, the Governor signed Executive Order B-29-15, which required a 25-percent reduction of urban potable water use throughout the State of California through February 28, 2016. The DWR was directed to lead a Statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought-tolerant landscapes, and the California Energy Commission was asked to implement a Statewide appliance rebate program to provide monetary incentives for replacing inefficient household devices. On November 13, 2015, the Governor signed Executive Order B-36-15 for additional actions to build on the State's ongoing response to record dry conditions and assist recovery efforts from 2015's devastating wildfires. On May 9, 2016, the Governor signed Executive Order B-37-16, which established a new water use framework for

California that bolstered the state's drought resilience and preparedness by establishing longer-term water conservation measures.

On April 7, 2017, the Governor signed Executive Order B-40-17, which ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices. The order was built on actions taken in Executive Order B-37-16, which remains in effect. In a related action, State agencies, including DWR, released a plan to continue making water conservation a way of life.

California Integrated Waste Management Act (AB 939)

Sections 40050 to 40063 of the *California Public Resources Code* is the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), created the Board now known as California Department of Resources Recycling and Recovery (CalRecycle) and accomplished the following: (1) it required each jurisdiction in the state to submit detailed solid waste planning documents for CalRecycle approval; (2) it set diversion requirements of 25 percent in 1995 and 50 percent in 2000; (3) it established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and (4) it authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. Jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting programs that best meet the needs of their community while achieving the diversion requirements.

Construction and Demolition Waste Diversion Requirements

In 2002, SB 1374 required CalRecycle, by March 1, 2004, to adopt a model ordinance suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition (C&D) waste materials from landfills. It required jurisdictions to summarize progress made in diversion of C&D waste materials in their annual progress reports to CalRecycle. In determining penalties for a jurisdiction's failure to implement its source reduction and recycling element or its household hazardous waste element, the bill required CalRecycle to determine if the jurisdiction has provided information on whether C&D waste materials are at least a moderately significant portion of the waste stream and, if so, whether the jurisdiction has adopted a local C&D ordinance, adopted CalRecycle's model ordinance, or implemented another C&D diversion program.

Solid Waste Disposal Measurement Act of 2008

The purpose of the Solid Waste Disposal Measurement Act of 2008 (SB 1016) is to make the process of goal measurement (as established by AB 939) more simple, timely, and accurate. Senate Bill 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. It accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment) and (2) its disposal, as reported by disposal facilities.

Since 2008, CalRecycle calculates each jurisdiction's per capita (per resident or per employee) disposal rates each year. If business is the dominant source of a jurisdiction's waste generation, CalRecycle may use the per employee disposal rate. Each year's disposal rate will be compared to that jurisdiction's 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an

indicator that allows for jurisdiction growth because, as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress or other changes over time.

Assembly Bill 341

On October 6, 2011, Governor Brown signed AB 341 establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 also mandates that local jurisdictions implement commercial recycling by July 1, 2012. CalRecycle will review each jurisdiction's commercial recycling program every two to four years for compliance. Businesses and public entities generating four cubic yards of trash or more and multi-family residential dwellings with five or more units are required to establish and maintain recycling service under AB 341.

Title 24 Green Building Standards

The 2016 California Green Building Standards Code (Title 24, Part 11 of the *California Code of Regulations*), effective January 1, 2017, requires the use of green building principles and practices in site planning and building design to promote energy and water efficiency and conservation; material conservation and resource efficiency; and environmental quality. Also known as the CALGreen Code, the voluntary and mandatory standards in the Code apply to new low-rise residential buildings, privately owned non-residential buildings (i.e., theaters, restaurants, banks, offices, daycare centers, industrial buildings, laboratories, department stores, storage and accessory buildings); State-owned buildings; public schools; medical facilities; and additions/alterations to existing non-residential buildings.

Mandatory measures include storm water pollution prevention, water conservation, and recycling and/or salvage of at least 50 percent of nonhazardous construction and demolition wastes. The West Covina Municipal Code adopts the CALGreen Code by reference, with specific amendments.

Regional

Integrated Water Resources Plan

The updated Integrated Resources Plan (IRP) for the Metropolitan Water District of Southern California approved by Metropolitan in October 2015, is Metropolitan's strategic plan for water reliability through the year 2040. The plan emphasizes water-use efficiency through conservation and local supply development (Metropolitan 2015).

Suburban Water Systems 2015 Urban Water Management Plan

Suburban Water Systems is an investor-owned water utility and part of SouthWest Water Company. The Suburban Water Systems 2015 Urban Water Management Plan (UWMP) was prepared in compliance with the Water Conservation Act of 2009 (SBX 7-7) and adopted by Suburban Water System on June 15, 2016 (MNS 2016). Suburban Water System pumps groundwater from both the Main Basin and Central Basin and purchases treated surface and groundwater from Covina Irrigation Company (CIC), treated groundwater from California Domestic Water Company (CDWC), and imported surface and reclaimed water from Metropolitan Water District of Southern California (MWD) through its member agencies, Upper San Gabriel

Valley Municipal Water District (USGVMWD), Central Basin Municipal Water District (CBMWD) and Three Valleys Municipal Water District (TVMWD). Suburban Water System serves approximately 300,000 people within its service area, currently divided into two main service areas including the San Jose Hills Service Area, and the Whittier/La Mirada Service Area (MNS 2016). Suburban Water Systems provides water to an approximately 42-square-mile service area that, in addition to the majority of West Covina, includes all or portions of Glendora, Covina, La Puente, Hacienda Heights, City of Industry, Whittier, La Mirada, La Habra, Buena Park and unincorporated portions of Los Angeles and Orange counties.

Sanitation Districts of Los Angeles County (LACSD)

The LACSD adopted a Wastewater Ordinance effective April 1, 1972 (which was amended on July 1, 1980; July 1, 1983; November 1, 1989; and July 1, 1998) to protect and finance the operation of its wastewater conveyance, treatment, and disposal facilities. The LACSD also adopted a Connection Fee Ordinance in 1981 (which was amended in 1984, 1990, 1992, 1997, and 2007). Companies that discharge industrial wastewater to the sewerage system are governed by both the Wastewater Ordinance and the Connection Fee Ordinance. These legal mechanisms establish the Districts' Industrial Wastewater Discharge Permit, Connection Fee, and Surcharge Programs. The Industrial Wastewater Discharge Permit Program allows for the regulation of industrial wastewater dischargers to protect the public health, environment, and the public sewerage system. The Surcharge Program requires all industrial companies discharging to the Districts' sewerage system to pay their fair share of the wastewater treatment and disposal costs. The Connection Fee Program requires all new users of the Districts' sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities.

Los Angeles Countywide Integrated Waste Management Plan

The Los Angeles Countywide Integrated Waste Management Plan (CIWMP), adopted by the Los Angeles County Board of Supervisors in January 1998 and approved by CalRecycle in June 1999, outlines a means of addressing the County's long-term refuse disposal needs in compliance with AB 939. The CIWMP is composed of the Los Angeles Countywide Summary Plan, the Source Reduction and Recycling Element (SRRE) for the County, the Nondisposal Facility Element (NDFE) for the County, the Household Hazardous Waste Element (HHWE) for the County, and the Los Angeles Countywide Siting Element. Additionally, the Los Angeles Department of Public Works is responsible for creating an Annual Report, which serves as an annual update to the Summary Plan. The latest Annual Report for the County of Los Angeles is the 2016 Annual Report (County of Los Angeles 2016).

Local

City of West Covina Sewer System Management Plan (SSMP)

The State Water Resources Control Board (State Water Board) adopted Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems, Water Quality Order No. 2006-0003 (Sanitary Sewer Systems WDR) on May 2, 2006. The Sanitary Sewer Systems WDR requires public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and report all SSOs to the State Water Board's online SSO database. The latest Sewer System Management Plan (SSMP) prepared by the City of West Covina is the City of West Covina's SSMP 2016 Update (West Covina 2017)

West Covina Municipal Code

Chapter 7, Article XVI, Waste Reduction, Reuse and Recycling of Construction and Demolition Debris, of the City's Municipal Code, outlines the requirements for diverting construction waste into landfills for every "covered project" as set forth in section 7-261(a) and (b). Construction and demolition wastes are required to be made available for deconstruction, salvage, and recovery prior to demolition (City of West Covina 2018a). Further, demolition and construction waste is requires diversion of a minimum of 50 percent of the construction and demolition debris resulting from that project in compliance with state and local statutory goals and policies and to create a mechanism to secure compliance with the stated diversion requirements.

Chapter 12, Garbage and Rubbish Collection, of the West Covina Municipal Code contains the City's regulations for residential, industrial and commercial refuse, recyclables, and green waste collection (City of West Covina 2018b). The Chapter contains regulations set the City's requirements for issuing permits to companies providing collection and disposal services in the City. They also outline the responsibilities of the refuse collection company, including regulations for waste receptacles and collection trucks. Regulations include those for the storage of refuse, recyclables, and green wastes; the placement of collection receptacles; and the disposal of hazardous wastes. In addition, Article III, Trash Enclosure District, outline the regulations pertaining to proper storage and disposal of solid waste in commercial areas of the City.

Section 26-515, Landscape criteria of the City of West Covina Development Standards sets landscaping standards for various purposes, including to conserve water. Preliminary and final landscape and irrigation plans are required to be prepared as part of the design review process for compliance with standards and approved by the planning director (City of West Covina 2018c). In addition, all landscape areas and irrigations systems shall be subject to the water efficiency provisions contained in Division 1, of Article XIV of Chapter 26 of the Municipal Code, and the Planning Commission Guidelines for Water Efficient Landscaping, unless otherwise exempted.

Article XIV, Division 1, Water Efficient Landscaping, of the Development Code provides landscape design guidelines that would reduce irrigation demands, promote recycled water use, and minimize irrigation runoff (City of West Covina 2018d). In addition, Section 26.750 of the West Covina Municipal Code includes the requirements and standards of the Model Water Efficient Landscape Ordinance or MWELO (City of West Covina 2018e).

4.15.2 EXISTING SETTING

Water (Potable and Non-Potable)

Potable water service is currently provided to the campus by Suburban Water Systems. There are three main public water lines serving the area, each operated and maintained by Suburban Water Systems; one 12-inch water main line in Merced Avenue and two 12-inch water main lines in Sunset Avenue. Additionally, there is an existing 12-inch water line originating at the existing 12-inch water line in Merced and running through the access road for approximately 450 feet. The campus is currently serviced by an 8-inch domestic water line with a source connection from the existing southeasterly 12-inch water line in Sunset Avenue. The 8-inch water line runs northwest through the site for approximately 720 feet, turns 90 degrees along the access road and runs southwest for approximately 250 feet and connects to the existing central plant. This existing water system is to remain in place to serve the existing hospital buildings. In addition, the existing medical office building in the south corner of the Project site is served by a separate meter and water line that diverts from the existing 12-inch water line at Sunset Avenue and enters the southeast side of the building.

The onsite fire protection water system is provided by pipes varying in size from 6-inch to 10- inch diameter. The main fire water system is serviced by a 10-inch fire water line that connects to the existing 12-inch waterline in Sunset Avenue, runs through two – double back flow devices at the property line, then runs parallel to the domestic water system northwest through the site, turns 90 degrees along the access road and runs southwest for approximately 430 feet, and connects to the existing central plant. The southwest side of the hospital is serviced by a 4-inch fire water service coming off the existing public 12-inch water line in the access road. Additionally, there is a 6-inch water line coming off the existing 12-inch public water line in Sunset Avenue serving a fire hydrant at the main entrance to the hospital building. These existing fire water systems are to remain in place to serve the existing hospital buildings. The existing medical office building in the south corner of the site is served by a separate fire water line that diverts from the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building.

Currently, the Queen of the Valley Hospital campus uses potable water to satisfy its landscaping irrigation needs; however, Suburban provides recycled water in the San Jose Hills Service Area, produced by the Sanitation Districts of Los Angeles County (SDLAC) and distributed by USGVMWD to Suburban's customers.

Water Supply

Suburban Water Systems

Suburban Water System is the largest water supplier within the City and serves the majority of the City of West Covina. Suburban Water System's water supplies include groundwater and imported surface water, local surface water supplies, and recycled water. Groundwater is the primary source of water supply for the City and provides approximately 80 percent of Suburban Water Systems' water supply (West Covina 2016).

The Project site is located within the San Jose Hills Service Area of the Suburban Water System with a total of approximately 42,000 service connections within the cities of Glendora, Covina, West Covina, La Puente, Walnut, and unincorporated areas of Los Angeles County (MNS 2016). The San Jose Hills Service Area encompasses approximately 24.17 square miles (15,470 acres). The service area is divided into three public water systems, which include: (1) The San Jose Hills water system serving parts of Hacienda Heights, La Puente, West Covina and Walnut; (2) the Covina Knolls water system serving portions of Covina and; (3) the Glendora water system serving portions of Glendora. The service area serves approximately 75 percent of the City of West Covina, 54 percent of the City of La Puente, 21 percent of the City of Walnut, 6 percent of the City of Glendora, and about 1 percent each of the City of Covina and portions of unincorporated Los Angeles (MNS 2016).

Groundwater

Groundwater resources provided to the City of West Covina by Suburban Water Systems as well as the other water agencies are drawn from the Main San Gabriel Groundwater Basin. Approximately 80 percent of West Covina's potable water is from the local groundwater basin, which is supplied by several water agencies' supply (West Covina 2016a). Each agency serving the City produces groundwater from privately owned wells dispersed throughout the Main San Gabriel Groundwater Basin. The Main San Gabriel Groundwater Basin is an adjudicated basin and is managed by the Main San Gabriel Basin Watermaster, as of 1973. The Watermaster is responsible for management and control of the withdrawal of water from this basin and notification of each of the basin pumpers of their annual share of the available resources. The Basin Watermaster currently estimates the amount of water in storage at 7.45 million acre-feet and has

attributed recent declines compared to historic levels to the effects of the current drought (MNS 2018). The basin contains several contaminant plumes including nitrates, volatile organic compounds, and perchlorate from past industrial processes. Cleanup of these contaminants continues today. Despite their presence, the overall groundwater quality of the basin for potable use is high (MSN 2016).

Imported Water

Suburban Water System obtains its imported water from the Metropolitan Water District of Southern California (MWD). The district transports water from the Colorado River via the Colorado River Aqueduct and from the State Water Project via the California Aqueduct. Imported supplies are treated at MWD's Weymouth Treatment Plant before reaching water agencies supplying the City. Suburban Water Systems purchases its imported water resources through its MWD local member agencies such as the USGVMWD, the Covina Irrigation Company (CIC), the City of Glendora, and the Walnut Valley Water District (MNS 2016).

Recycled Water

Suburban Water Systems in cooperation with the USGVMWD has 14 miles of pipeline, a 2-million-gallon reservoir, a pump station, and a pressure-reducing station producing more than 440 million gallons of recycled water throughout the City of West Covina per year (West Covina 2016a). Recycled water available to agencies serving West Covina is purchased from the LACSD via the Whittier Narrows Water Reclamation Plant and the San Jose Creek Water Reclamation Plant. The Whittier Narrows Water Reclamation Plant has a capacity of 15 million gallons of wastewater per day. The San Jose Creek Water Reclamation Plant has a capacity of approximately 100 million gallons per day (MNS 2016).

Reliability of Long-Term Water Supply

The reliability of the water supply to the City of West Covina currently depends on the reliability of both groundwater and imported water supplies, which are managed and delivered by multiple water agencies, as previously discussed.

Metropolitan Water District of Southern California

As indicated in MWD's Regional UWMP (MWD 2016), Southern California faces the challenge of satisfying its water demands and securing imported water supplies from the Sacramento/San Joaquin Delta (Delta). Increased environmental regulations and the collaborative competition for water from outside the region have resulted in reduced supplies of imported water. Major sources of uncertainty include Delta pumping restrictions, organism decline, climate change and sea level rise, and levee vulnerability to floods and earthquakes. The MWD developed a long-term plan that established direction to address the range of potential changes in water supply planning, including uncertainties related to climate change and actions to protect endangered fisheries. Metropolitan has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions, as well as average year hydrologic conditions (MWD 2016).

The MWD has a 5,200-square-mile service area and imports about half of the water used in Southern California. The other half of the water comes from local surface and groundwater supplies, recycled water, and water imported from the Owens Valley by the City of Los Angeles. Urban water demands use approximately 20 percent of California's developed water supply, and agricultural uses consume approximately 80 percent. The MWD imports water from the Colorado

River and, through a contract with the State of California, from Northern California via the SWP. The State Water Project (SWP), MWD's Colorado River Aqueduct, and MWD's local water facilities and programs have many layers that provide reliability. The SWP includes the San Luis Reservoir, near the City of Los Banos in Central California, and, closer to Southern California, Pyramid and Castaic Lakes on the West Branch and Silverwood Lake and Lake Perris on the East Branch of the SWP. The MWD, in turn, has over one million af of surface water storage in Southern California, including the new Diamond Valley Lake Reservoir near Hemet, in addition to large groundwater storage projects (MWD 2017).

Suburban Water Systems

Suburban has various water supply sources available (groundwater, imported water, purchased water, and recycled water) to meet demands during normal, single-dry, and multiple-dry years. Primary sources of groundwater water supplying the Suburban's service area are from the Main Basin and the Central Basin. Both basins are managed under adjudications and are anticipated to support the same levels of water through 2040. As discussed previously, recent problems with groundwater pollution in the Main Basin are proactively being addressed and solutions are being developed by the Watermaster and the San Gabriel Basin Water Quality Authority. The Central Basin and the Main Basin are expected to continue to be utilized to their fullest extent as a source of water. Suburban's imported water is provided through MWD and Suburban purchases water from surrounding member agencies. MWD's water reliability analysis indicates it can continue to provide reliable imported water through 2040 by utilizing supplies, transfers, and storage. Additionally, water from the Covina Irrigating Company (CIC) surface water plant is supplied by reservoirs in the canyon of the San Gabriel River and provide year-round storage, which accounts for fluctuations in rainfall. The recycled water supply received from the San Jose Creek Water Reclamation Plant is not affected by rainfall as irrigation demand does not contribute to wastewater flows and does not affect the availability of recycled water and is commonly viewed as a "drought proof supply" (MNS 2016).

Table 4.15-1 shows projected average water supply and demand through the year 2040, assuming a multiple-dry year scenario. Based on UWMP projected water supply and demands, Suburban Water System has supply capabilities that would be sufficient to meet expected demands through 2040 under single-dry-year and multiple-dry year conditions (MNS 2016).

**TABLE 4.15-1
PROJECTED AVERAGE WATER SUPPLY AND DEMAND FOR SUBURBAN
WATER SYSTEMS (MULTIPLE-DRY YEAR SCENARIO)(ACRE-FEET)**

Water Supply Source	2020	2025	2030	2035	2040
Water Supply Source	44,174	44,174	44,174	44,174	44,174
Total Supply	40,850	40,850	40,850	40,850	40,850
Total Demand	3,324	3,324	3,324	3,324	3,324
Source: Suburban Water Systems, 2016					

As of 2015, Suburban Water Systems water supply portfolio for the San Jose Hills region was comprised of approximately 70 percent purchased or imported water (17,066 af), 26 percent self-produced groundwater (6,304 af), and 4 percent recycled water (743 af) with this supply mix remaining consistent through 2040 (MNS 2016).

Wastewater and Wastewater Treatment

Wastewater service within West Covina is provided by the City's Public Works Department. Wastewater from the City's system is treated by the Sanitation Districts of Los Angeles County (LACSD). The LACSD is a combination of 24 independent special districts responsible for collecting, treating, recycling, and disposing of the wastewater and industrial wastes generated by 5.5 million people living in an 824-square-mile area of Los Angeles County. The LACSD operates approximately 1,400 miles of main trunk sewers, 48 active pumping plants, and 11 wastewater treatment plants (LACSD 2018a).

West Covina's existing sewer system consists of interceptors and lift stations for the conveyance of wastewater within the City. Specifically, the collection system consists of over 227 miles of gravity sewer and three pump stations (West Covina 2016a).

The Project site's wastewater is treated and disposed of at the LACSD's San Jose Creek Water Reclamation Plant (SJCWRP) (LACSD 2018b), located at 1965 Workman Mill Road in unincorporated Los Angeles County, the SJCWRP occupies approximately 39 acres north of the Pomona Freeway (SR 60) on both sides of the San Gabriel River Freeway (SR 605), located adjacent to the City of Industry. The SJCWRP has a maximum permitted capacity of 100 million gallons of wastewater per day (MGD), serving a large residential population of approximately one million people. Currently, the SJCWRP treats an average flow of 63.8 MGD (LACSD 2018). All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson (LACSD 2018b).

Wastewater flows originating from the Project site would discharge to a local sewer line maintained by the City of West Covina for conveyance to the LACSD's Joint Outfall H Unit 8M Trunk Sewer located in Sunset Avenue north of Merced Avenue. The LACSD 27-inch diameter truck sewer has a capacity of 14.4 MGD and conveyed peak flow of 5.2 MGD as of 2015 (LACSD 2018b).

Solid Waste Collection and Disposal Services

The City of West Covina contracts with Athens Services to provide trash, recycling, and special pickup services throughout the City. Athens Services provides trash and recycling collection service to residences, as well as all commercial, governmental, and industrial facilities within West Covina (West Covina 2016). Waste collected by Athens Services within the City is taken to a Materials Recovery Facility (MRF) in the City of Industry, which accepts trash and as well as commingled materials such as glass, plastic, cardboard, etc. that is sorted and separate at the facility (West Covina 2016). The City of Industry MRF can process 5,000 tons of mixed material each day (West Covina 2016).

After waste is sorted at the Athens MRF, material that cannot be recycled is sent to the Victorville Sanitary Landfill located in the City of Victorville. Victorville Sanitary Landfill is owned and operated by the County of San Bernardino Solid Waste Management Division. The landfill has a permitted daily throughput of 3,000 tons/day, a max permitted capacity of 83,200,000 cubic yards, and an estimated remaining capacity of 81,510,000 (CalRecycle 2018a).

Assembly Bill 939 requires that each County and City prepare a source reduction and recycling element showing how it will meet the following solid waste diversion goals: 25 percent by the year 1995 and 50 percent by the year 2000 and every year after. Compliance with AB 939 is now measured in terms of actual disposal amounts per person compared to target amounts; actual disposal amounts at or below targets follow AB 939. Senate Bill 1016 passed in 2008 and

introduced a per capita disposal measurement system that measures the 50 percent diversion requirement using a disposal measurement equivalent. In 2016, California's statewide disposal was 35.2 million tons and the population were 39.2 million residents. This resulted in a per resident disposal rate of 4.9 pounds/resident/day calculated using SB 1016's measurement system. This is slightly more than the 2015 rate of 4.7 pounds/resident/day. However, the per-resident "diversion rate equivalent" to was 63 percent in 2015 and decreased to 61 percent in 2016 (CalRecycle 2018b).

The majority of waste reduction for the City of West Covina is done through Athens Services at the MRF in the City of Industry. The City of West Covina also operates waste reduction programs including a bottle and can recycling program with four certified redemption centers located within the City where residents can drop off CRV beverage containers. Additionally, West Covina residents can participate in product exchange programs sponsored by Los Angeles County Material Exchange (LACoMAX) and California Materials Exchange (CalMAX) in addition to rebates offered by the City on the purchase of composting bins (West Covina 2016a).

Existing Infrastructure

Water

There are three main public water lines serving the area, each operated and maintained by Suburban Water Systems, one 12-inch water main line in Merced Avenue and two 12-inch water main lines in Sunset Avenue. Additionally, there is an existing 12-inch water line originating at the existing 12-inch water line in Merced and running through the access road for approximately 450 feet. The campus is currently serviced by an 8-inch domestic water line with a source connection from the southeasterly existing 12-inch water line in Sunset Avenue. The 8-inch water line runs northwest through the site for approximately 720 feet, turns 90 degrees along the access road, and runs southwest for approximately 250 feet and connects to the existing central plant. This existing water system is to remain in place to serve the existing hospital buildings.

The existing medical office building in the southern corner of the site is served by a separate meter and water line that comes off the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building. This service would likely remain in place.

Fire Water

The pipe sizes for the onsite fire water systems vary from 6-inch to 10- inch diameter. The main fire water system is serviced by a 10-inch fire water line that connects to the existing 12-inch waterline in Sunset Avenue, runs through two double back flow devices at the property line, then runs parallel to the domestic water system northwest through the site, turns 90 degrees along the access road and runs southwest for approximately 430 feet, and connects to the existing central plant. The southwestern side of the hospital is serviced by a 4-inch fire water service coming off the existing public 12-inch water line in the access road. Additionally, there is a 6-inch wire water line coming off the existing 12-inch public water line in Sunset Avenue serving a fire hydrant at the main entrance to the hospital building. These existing fire water systems are to remain in place to serve the existing hospital buildings.

The existing medical office building in the southern corner of the site is serviced by a separate fire water line that comes off the existing 12-inch water line in Sunset Avenue and enters the southeast side of the building. This service would remain in place.

Sewer

There are two main public sewer lines serving the area around the site, operated and maintained by the City of West Covina, one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue. The 27-inch public sewer pipe in Sunset Avenue runs southwest and connects to the 33-inch public sewer pipe in Merced Avenue, which eventually carries the sewage to the San Jose Creek East Water Reclamation Plant (WRP) adjacent to the City of Whittier. The campus is currently serviced by three existing sewer mainlines. The main hospital building is serviced by two 8-inch sewer lines exiting the hospital on the southeastern side and joining at the property line into one 10-inch sewer line before connecting to the existing 27-inch public sewer line in Sunset Avenue. The central plant is serviced by a 6-inch sewer line running in the access road for approximately 850 feet before connecting to the existing 33-inch public sewer line in Merced Avenue.

Drainage

There are two main storm drain lines servicing the area around the site, operated and maintained by the City of West Covina, one 42-inch storm drain main in Sunset Avenue and one 120-inch storm drain main in Merced Avenue. The 42-inch public storm drain pipe in Sunset Avenue runs southwest and connects to the 120-inch public storm drain pipe in Merced Avenue that runs northwest and outlets to Walnut Creek Wash. The site, generally, has three drainage areas. The first drainage area, approximately 11.2 acres, in the southeastern half of the site surface flows southeast to Sunset Avenue where it is then collected by the 42-inch public storm drain pipe in Sunset Avenue. The second drainage area, approximately 6.5 acres, in the western quadrant of the site surface flows southwest to Merced Avenue where it is then collected by the 120-inch public storm drain pipe in Merced Avenue. The third drainage area, approximately 8.3 acres, in the northern quadrant of the site surface flows southwest to an existing 24-inch storm drain line that runs northwest for approximately 400 feet and outlets to Walnut Creek Wash. Additionally, there are several roof drain lines throughout the site varying in size from 6-inch to 12-inch. All roof drain lines connect to a 14-inch roof drain line in the access road, which runs southwest and connects to the existing 120-inch public storm drain pipe in Merced Avenue.

4.15.3 THRESHOLDS OF SIGNIFICANCE

Thresholds Addressed in this Draft EIR

According to Appendix G of the CEQA Guidelines, a project will normally have a significant adverse environmental impact on utilities and service systems if it will:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- 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?
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements are needed.

- 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.
- Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- Comply with federal, state, and local statutes and regulations related to solid waste.

4.15.4 ENVIRONMENTAL IMPACTS

Impact Analysis

Threshold 15.1	Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
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Development facilitated by the proposed Project would increase demand for wastewater treatment services, as Project implementation would add 200 new beds and 490,000 square feet of building space at the Project buildout. The demand for wastewater treatment services would incrementally increase with completion of each of the four phases of the Project.

As described previously, wastewater from the City is treated and disposed of at the LACSD's SJCWRP, and/or the WNRP. All sewage treatment/wastewater reclamation plants are subject to the water quality discharge requirements of the applicable National Pollution Discharge Elimination System (NPDES) permit. The Queen of the Valley Hospital campus is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB) and is subject to the waste discharge requirements of the Los Angeles County MS4 Permit (Order No. R4-2012-0175). Future development pursuant to the QVHSP would increase wastewater flows on LACSD sewer lines, and at the WRP. Any sewer discharges that would cause a receiving WRP to exceed applicable NPDES requirements for discharges into MS4 facilities would result in a potentially significant impact.

LACSD is empowered by the California Health and Safety Code to charge a fee for the directly or indirectly connecting to the LACSD Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. All wastewater discharges into LACSD facilities would be required to comply with the discharges standards set forth to protect the public sewerage system. The LACSD Surcharge program requires all industrial companies discharging to the LACSD sewerage system to pay their fair share of the wastewater treatment and disposal costs. The Connection Fee program requires all new users of the LACSD sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. Therefore, compliance with LACSD requirements would ensure that potential impacts related to wastewater treatment requirements would be less than significant.

Summary of Impacts. Implementation of the QVHSP would comply with applicable LACSD requirements and would not exceed wastewater treatment requirements of the LARWQCB. Impacts would be less than significant, and no mitigation required.

Threshold 15.2	Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
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Implementation of the QVHSP includes development of the new emergency room, new intensive care unit, new medical office building, new parking structures, and new hospital building. All proposed healthcare buildings would conform to the Office of Statewide Health Planning and Development (OSHPD) design standards. The scope of authority for OSHPD extends to many types of healthcare buildings but does not include medical office buildings or other non-hospital buildings on a campus. Therefore, the new emergency room, new intensive care unit, and new hospital building would be required to comply with OSHPD design standards. Due to OSHPD requirements a new central plant would need to be constructed as well. This central plant would be located adjacent to the existing central plant in the center of the campus and would serve the new hospital tower. All public water lines, sewer lines, and storm drain lines would be analyzed to verify that they have enough capacity for the proposed improvements.

Water Infrastructure

Domestic Water

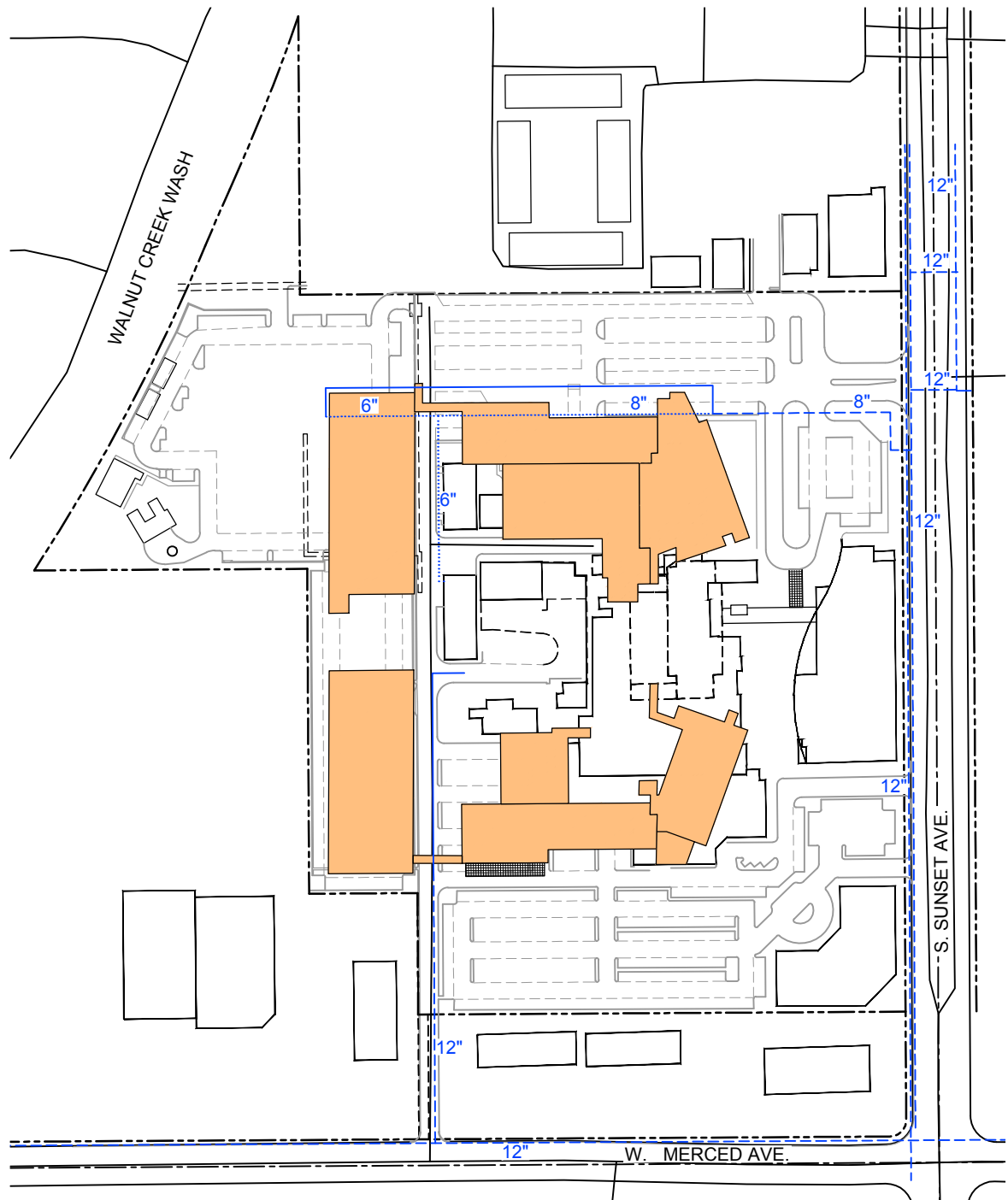
The existing domestic water system would remain in place to serve the existing medical office building, hospital buildings, and central plant. The proposed emergency room, intensive care unit, and medical office building would be served by a new domestic water lateral connected to the existing public 12-inch water line in Sunset Avenue. The proposed central plant would be serviced by a new domestic water line that would run from the central plant southwest in the access road and connect to the existing public 12-inch water line in Merced Avenue. Each new domestic water lateral would require a meter as it comes off the public mainline (refer to Exhibit 4.15-1, *Existing and Proposed Water Plan*).

Physical impacts related to installation of onsite infrastructure are addressed as part of the Project. The primary environmental impacts associated with onsite infrastructure installation and adjacent connections to existing facilities would be related to air quality and traffic, as this component of construction mainly involves grading, excavation, and movement and placement of the infrastructure materials. Mitigation Measure UTL-1 and applicable mitigation measures for construction would address potential significant impacts associated with construction of utilities (see Section 4.2, *Air Quality*, and Section 4.13, *Transportation/Traffic*). Therefore, through consistent implementation of a variety of measures related to construction, no additional impacts related to construction and operation of utility systems would occur.

Water used for irrigation and landscape purposes would be required to comply with Section 26-515, Landscape criteria of the City of West Covina Development Standards Article XIV, Division 1, Water Efficient Landscaping, of the Development Code, which includes landscape design guidelines that would reduce irrigation demands, promote recycled water use, and minimize irrigation runoff. In addition, Section 26.750 of the West Covina Municipal Code includes requirements and standards of the Model Water Efficient Landscape Ordinance or MWEL. Preliminary and final landscape and irrigation plans are required to be prepared as part of the design review process for compliance with standards and approved by the Community Development Director or his/her designee. Further, all landscape areas and irrigations systems would be subject to the water efficiency provisions contained in Division 1, of Article XIV of Chapter 26 of the Municipal Code, and the Planning Commission Guidelines for Water Efficient

LEGEND

- EXISTING WATER LINE
- ... EXISTING WATER LINE TO BE REMOVED
- PROPOSED WATER LINE



Source: Queen of the Valley Specific Plan, Psomas 2019

Existing and Proposed Water Plan

Exhibit 4.15-1

Queen of the Valley Hospital Specific Plan EIR



Map not to scale

Landscaping, unless otherwise exempted (refer to Mitigation Measure UTL-2 and Mitigation Measure UTL-3).

Fire Service

The existing fire service water system would remain in place to serve the existing medical office building, hospital buildings, and central plant. The proposed emergency room, intensive care unit, and medical office building would be served by a new fire water lateral connected to the existing public 12-inch water line in Sunset Avenue. The proposed central plant would be serviced by a new fire water line, which would run from the proposed central plant southwest in the access road and connect to the existing public 12-inch water line in Merced Avenue. Each new fire water lateral would require a meter and backflow as it comes off the public mainline (refer to Exhibit 4.15-2, *Existing and Proposed Fire Water Plan*).

Sewer Infrastructure

The existing sewer system would remain in place to serve the existing medical office building and hospital buildings. The proposed emergency room, intensive care unit, and medical office building would be served by a new sewer lateral connecting to the existing 8-inch sewer lateral in the southeast half of the site. The proposed central plant would be serviced by the existing 6-inch lateral in the access road. Both laterals may need to be upsized when demand and capacity calculations are performed (refer to Exhibit 4.15-3, *Existing and Proposed Sewer Plan*).

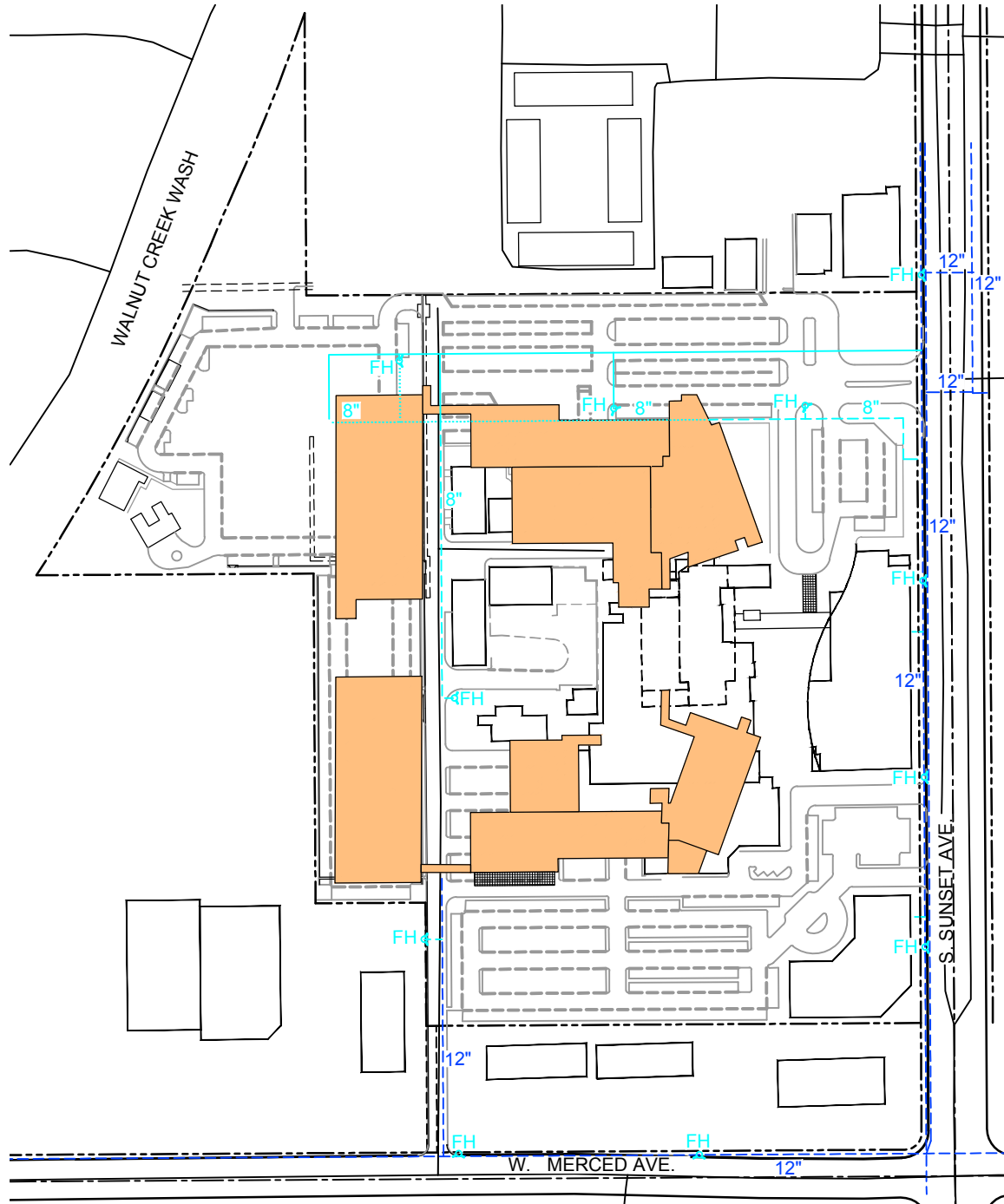
In summary, while new water, and sewer infrastructure are constructed on site, no off-site improvements would be necessary. Final water plans would be designed and infrastructure installed in compliance with applicable requirements of the Suburban Water Systems, LACSD, West Covina Municipal Code, and Development Standards of the QVHSP in compliance with West Covina Development Standards (refer to Mitigation Measure UTL-1). A letter of compliance from Suburban Water Systems would be required to show compliance of proposed water and sewer infrastructure plans with Suburban Water Systems requirements. The impact of the proposed Project related to additional demand for domestic water and recycled water and the generation of additional wastewater would be less than significant.

Physical impacts related to installation of onsite infrastructure are addressed as part of the Project. The primary environmental impacts associated with onsite infrastructure installation and adjacent connections to existing facilities would be related to air quality and traffic, as this component of construction would mainly involve grading, excavation, and movement and placement of the infrastructure materials. Mitigation Measure UTL-1 and applicable mitigation measures for construction would address potential significant impacts associated with construction of utilities (see Section 4.2, *Air Quality*, and Section 4.13, *Transportation/Traffic*). It should be noted that infrastructure improvements may also be necessary within the existing utility/access easement area just southeast of the Project site and outside of the Specific Plan area. Therefore, through consistent implementation of a variety of measures related to construction, no additional impacts related to construction and operation of utility systems would occur.

The wastewater collection system would be designed to provide adequate capacity to transmit the estimated flows. Additionally, with incorporation of the City standards requirements related to wastewater generation, the Projects' impacts on wastewater generation would be less than significant.

LEGEND

- EXISTING WATER LINE
- EXISTING FIRE WATER LINE
- EXISTING FIRE WATER LINE TO BE REMOVED
- ▽ EXISTING FIRE HYDRANT
- PROPOSED FIRE WATER LINE



Source: Queen of the Valley Specific Plan, Psomas 2019

Existing and Proposed Fire Water Plan

Exhibit 4.15-2

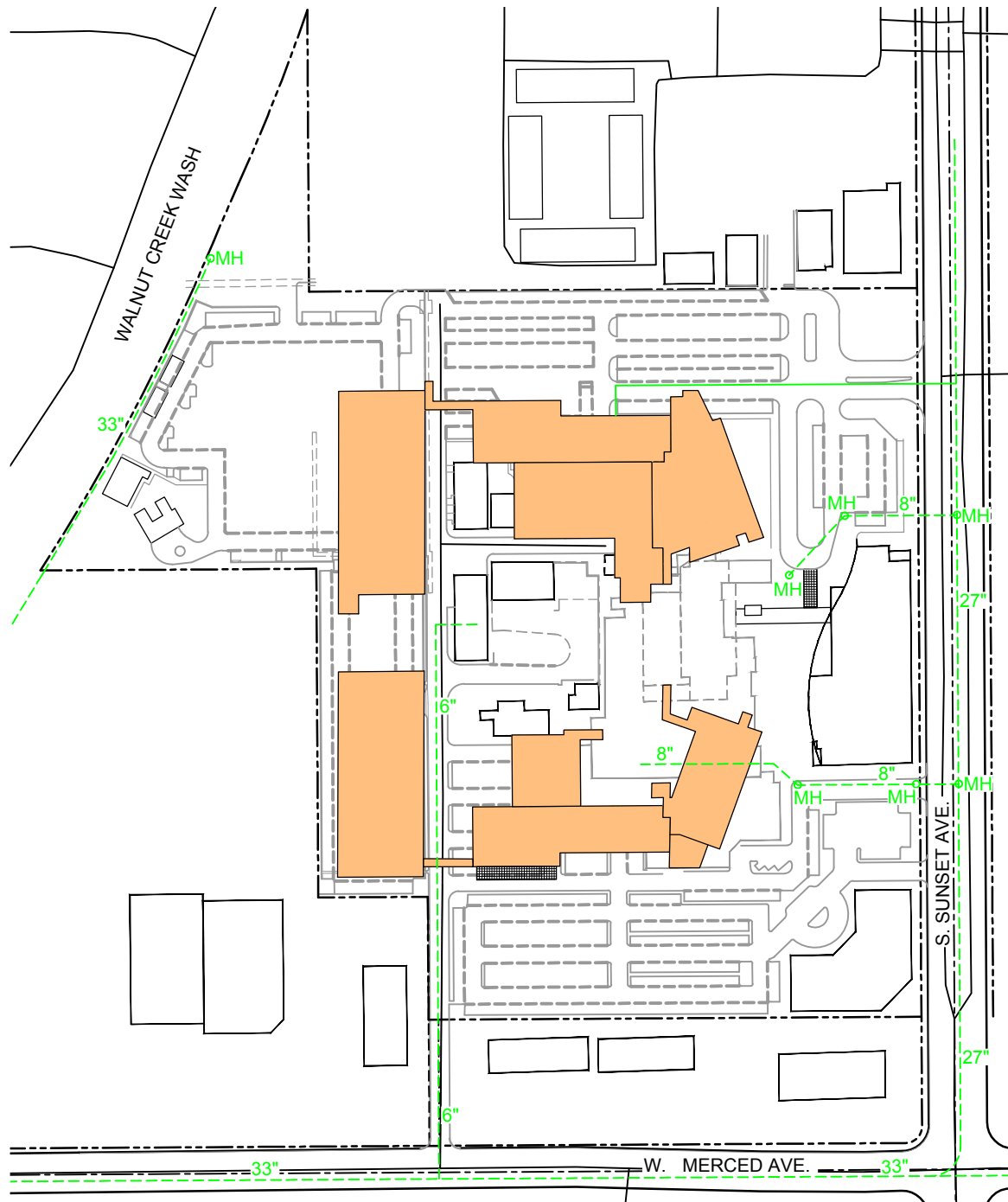
Queen of the Valley Hospital Specific Plan EIR



Map not to scale

LEGEND

- EXISTING SEWER LINE
- EXISTING SEWER MANHOLE
- PROPOSED SEWER LINE



Source: Queen of the Valley Specific Plan, Psomas 2019

Existing and Proposed Sewer Plan

Exhibit 4.15-3

Queen of the Valley Hospital Specific Plan EIR



Map not to scale

Summary of Impacts. Development allowed by the proposed QVHSP would require the construction of new water, recycled water, and sewer lines on site. However, no off-site improvements would be needed. Construction of infrastructure improvements within and immediately adjacent to the Project area would result in short-term impacts related to air quality and traffic. These impacts are addressed in Section 4.2, *Air Quality* and Section 4.13, *Transportation/Traffic*. No additional impacts related to construction and operation of utility systems would occur.

Mitigation Measures

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

UTL-2 Landscaping associated with future development in the Queen of the Valley Hospital Specific Plan (QVHSP) area shall be implemented in compliance with Section 26-515, *Landscape Criteria*, of the City of West Covina Development Standards, which sets landscape standards and water conservation requirements. In addition, all landscape areas and irrigations systems shall be subject to the water efficiency provisions contained in Division 1, of Article XIV of Chapter 26 of the Municipal Code, and the Planning Commission Guidelines for Water Efficient Landscaping, unless otherwise exempted. and Section 26.750 of the West Covina Municipal Code includes the requirements and standards of the Model Water Efficient Landscape Ordinance or MWELC.

UTL-3 Landscape plans prepared for future development in the QVHSP area shall be developed in compliance with Section 26.708, *Landscape Plans*, of the City of West Covina Development Code, which requires final map landscaping plans including planting design and an irrigation system to be prepared by a licensed landscape architect and submitted by the applicant for review and approval by the planning director or duly authorized representative.

Threshold 15.3	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?
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The proposed Project would maintain the existing drainage patterns. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) map number 06037C1700F the site is outside of the 100-year flood plain and in an area of 0.2 percent annual chance of flood. Structural or Treatment Control Best Management Practices (BMPs) are required for the proposed Project under the Standard Urban Storm Water Mitigation Plan (SUSMP) conditions assigned by the City. Volume-based or flow-based design standards may be used separately or in combination. Volume-based criteria are used in the sizing of detention or infiltration structures while flow-based criteria are used on swales, catch basin devices or wetlands. The SUSMP requirements, approved by the Regional Water Quality Control Board, call for the treatment of the peak mitigation flow rate or volume of runoff produced by a 0.75 inch 24-hour rainfall event. Various stormwater treatment facilities would be provided throughout the site to capture and treat stormwater runoff from the site.

As identified under the analysis of Thresholds 4.8-3 and 4.8-4 in Section 4.8, *Hydrology and Water Quality*, of this Program EIR, the Project site is already fully improved with impervious surfaces except for the former Sunset Field site in the northeast corner of the property. Development of this area would eventually cover the area with predominately impervious surfaces, which may incrementally increase onsite runoff. While the proposed Project would increase impervious areas on the site, the proposed storm drainage system would reduce the off-site flows through the use of onsite Low Impact Development (LID) and BMP systems that would generally be sized to handle the two-year water quality storm event, per County requirements including, hydrologic source-control, infiltration, and biorientation systems. Therefore, the proposed Project would not require construction of a new storm water drainage facility or expansion of existing facilities that would result in significant impacts.

The storm water runoff from the Project site would not exceed the capacity of the storm drain system, and no infrastructure improvements would be required beyond the installation of onsite storm drain facilities.

An Infrastructure Plan would be prepared to ensure that essential services and systems would have enough capacity and would be available in time for implementation of the new facilities. In addition, a hydrology analysis would be required for each new building and site project to determine the pre-development runoff and identify design strategies that would minimize the post-development runoff. The design of new site improvement and building projects would comply with the Los Angeles County storm water quality management program and LID Ordinance. Infiltration systems that treat and percolate storm water to recharge the local aquifer would be most highly prioritized, followed by storm water capture and reuse and high-removal-efficiency biofiltration.

As discussed previously, LID BMPs would be implemented for individual project components to regulate the amount and volume of storm water runoff and to treat the water quality before it enters the regional storm drain system. The final sizing and design of onsite facilities would occur during final building design; however, the conceptual storm drain plan and water quality treatment BMP plan have been developed to provide sufficient capacity in proposed on-campus storm drain lines to ensure that required water quality treatment is accomplished and the increase in storm water runoff from implementation of the proposed QVHSP would not exceed the capacity of the existing local storm drains serving the site.

Construction activities associated with the proposed onsite storm drain facilities would be within the physical impact area identified for the proposed Project, as shown on (Exhibit 4.15-4, *Existing and Proposed Drainage Plan*). No additional impacts associated with construction of onsite storm drains or connections to existing facilities would occur. Impacts would be less than significant, and no mitigation is required.

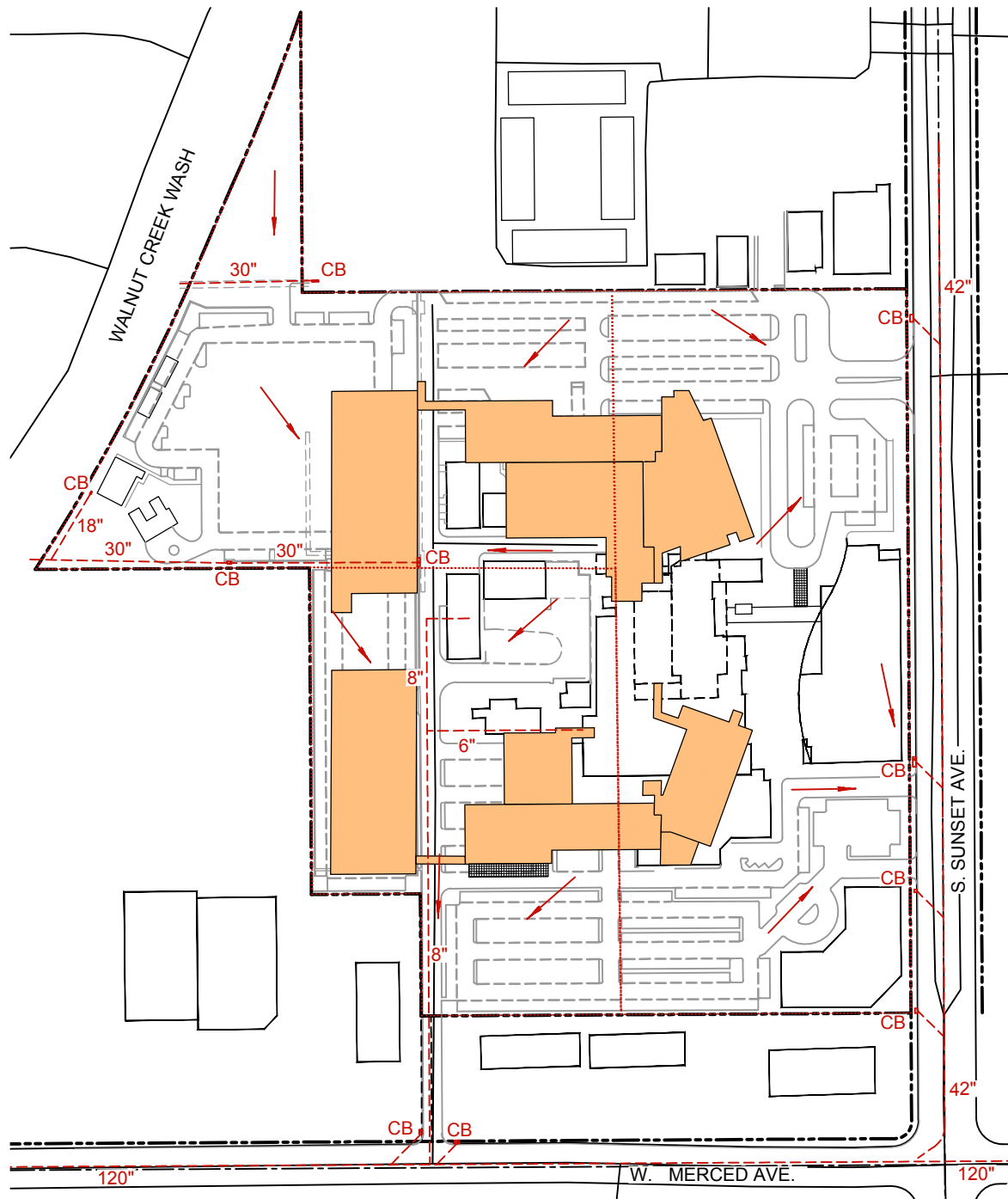
Threshold 15.4	Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
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Projected Water Demand

The existing hospital (1.1 million square feet) has 1,687 staff and 160 patients per day (based on 58,400 annual patients) or 1,847 persons per day. If each person consumed 150 gallons per person per day, the existing Hospital would consume approximately 277,050 gallons per day. The proposed Project would increase the Hospital's square footage by 45 percent, so the Project's estimated consumption (assuming 45 percent of 277,050 gallons) would be 124,673 gallons per

LEGEND

- EXISTING STORM DRAIN
- EXISTING STORM DRAIN CATCH BASIN
- ... DRAINAGE AREA BOUNDARY
- DIRECTION OF FLOW



Source: Queen of the Valley Specific Plan, Psomas 2019

Existing and Proposed Drainage Plan

Exhibit 4.15-4

Queen of the Valley Hospital Specific Plan EIR



Map not to scale

day. This projected estimated consumption for the Project would be well below the amount for 500 homes as estimated at 187,500 gallons per day or 68.4 million gallons per year (based on 2.5 persons per unit at 500 units and an individual consumption rate of 150 gallons per person per day). Therefore, no Water Supply Assessment would be required for the proposed QVHSP.

The 2016 UWMP indicates that the Suburban Water Systems would have adequate water supplies to meet demands during normal, single-dry, and multiple-dry years to 2040 (TVMWD 2016). Further, compliance with the City's water conservation requirements Mitigation Measure UTL-3 and UTL-4 regarding water efficient landscaping and irrigation systems and water conservation measures in the CALGreen Code, and water efficiency guidelines within the proposed QVHSP would also reduce water demand. Thus, with implementation of the above mitigation measures, the potential impact on water supplies would be less than significant.

Projected Supplies

Suburban Water Systems has historically met all of its water demands through various water supply sources available (groundwater, imported water, purchased water, and recycled water) to meet demands during normal, single-dry, and multiple-dry years. Primary sources of groundwater water supplying the Suburban's service area are from the Main Basin and the Central Basin. Both basins are managed under adjudications and are anticipated to support the same levels of water through 2040. As discussed previously, recent problems with groundwater pollution in the Main Basin are proactively being addressed and solutions developed by the Watermaster and the San Gabriel Basin Water Quality Authority. The Central Basin and the Main Basin are expected to continue to be utilized to their fullest extent as a source of water. Suburban's imported water is provided through MWD and Suburban purchases water from surrounding member agencies. MWD's water reliability analysis indicates it can continue to provide reliable imported water through 2040 by utilizing supplies, transfers, and storage. Additionally, water from the Covina Irrigating Company (CIC) surface water plant is supplied by reservoirs in the canyon of the San Gabriel River and provide year-round storage, which accounts for fluctuations in rainfall. The recycled water supply received from the San Jose Creek Water Reclamation Plant is not affected by rainfall as irrigation demand does not contribute to wastewater flows; does not affect the availability of recycled water; and is commonly viewed as a "drought proof supply" (MNS 2016).

Table 4.15-1 shows projected average water supply and demand through the year 2040, assuming a multiple-dry year scenario. Based on UWMP projected water supply and demands, Suburban Water System has enough capacity that would be sufficient to meet expected demands through 2040 under single-dry-year and multiple-dry year conditions (MNS 2016).

As of 2015, Suburban Water Systems water supply portfolio for the San Jose Hills region was comprised of approximately 70 percent purchased or imported water (17,066 af), 26 percent self-produced groundwater (6,304 af), and 4 percent recycled water (743 af). This supply mix would remain consistent through 2040, which is sufficient to meet future projected potable water demands within its system, including the demand from the Project.

Any future development meeting the applicable requirements would comply with the City's water conservation requirements (refer to Mitigation Measure UTL-3 and UTL-4).

Summary of Impacts. Development allowed by the proposed QVHSP would require water supplies from Suburban Water Systems. Suburban Water Systems has available water supplies to meet the water demands of the Project through 2040, including demands during normal, single dry and multiple dry years. Any future development meeting the applicable requirements would comply with the City's water conservation requirements (refer to Mitigation Measures UTL-3 and

UTL-4). Thus, impacts would be less than significant with implementation of the above mitigation measures.

Threshold 15.5	Would the project 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?
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While new water and sewer infrastructure would be constructed on site, no off-site improvements are necessary. Final water plans would be designed, and infrastructure would be installed in compliance with applicable requirements of the Suburban Water Systems, LACSD, West Covina Municipal Code, and Development Standards of the QVHSP in compliance with West Covina Development Standards (refer to Mitigation Measure UTL-2). A letter of compliance from Suburban Water Systems would be required to show compliance of proposed water and sewer infrastructure plans with Suburban Water Systems requirements. With implementation of Mitigation Measure UTL-2, the impact of the proposed Project related to additional demand for domestic water and recycled water and the generation of additional wastewater would be less than significant.

Although the proposed Project would be expected to generate additional wastewater into the existing system, the Project would not include additional water quality concerns beyond those already enforced and being met by the San Jose Creek WRP. The San Jose Creek WRP currently supports wastewater treatment and flows from the QVHSP campus and would continue to do so following implementation of the QVHSP. The proposed Project would connect to the existing wastewater system and would not include the development of major new sewer lines. The additional wastewater flow originating from the proposed Project would discharge to a local sewer line maintained by the City, for conveyance to the LACSD's Joint Outfall H Unit 8m Trunk Sewer, located in Sunset Avenue north of Merced Avenue.

As discussed previously, the LACSD 27-inch diameter truck sewer has a capacity of 14.4 mgd and conveyed peak flow of 5.2 mgd in 2015 (LACSD 2018). The San Jose Creek WRP has a capacity of 100 mgd and currently processes an average flow of 63.8 mgd. LACSD is anticipated to have sufficient capacity in the San Jose Creek WRP to treat wastewater flows from the campus with implementation of the EFMP (Phases 1A, 1B, and 2), resulting in a less than significant impact. Also, consistent with the Connection Fee program of LACSD's Wastewater Ordinance, all new users of the LACSD sewerage system or existing dischargers who increase their discharge must pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. No off-site facility upgrades are needed to serve the proposed Project.

It should also be noted that sewer service to individual uses would comply with the LACSD's Rates, Rules, and Regulations for Sewer Services and Non-Domestic Wastewater Discharge Regulations. Thus, the development under the proposed Specific Plan would pay connection fees and service charges to the LACSD for the operation and maintenance of the sewer collection system, which includes capital capacity reimbursement fees for San Jose Creek WRP treatment services. Therefore, the impacts would be less than significant, and no mitigation is required.

Summary of Impacts. Wastewater generated by non-residential and associated uses allowed by the proposed Specific Plan Amendment would be treated at the San Jose Creek WRP, which has available treatment capacity. Impacts would be less than significant, and no mitigation is required.

Threshold 15.6	Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
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The proposed Project would result in generation of solid waste during construction and operation. As identified previously, collected wastes are brought to the City of Industry MRF, where recyclables are sorted and processed. Solid waste that is not diverted is disposed of at the Victorville Sanitary Landfill, a Class III (i.e., municipal waste) landfill.

Solid Waste Generation During Construction

The onsite structures, paved surfaces, and landscape vegetation would be demolished/removed during construction of the proposed Project. Based on the U.S. Environmental Protection Agency's (USEPA's) new construction and demolition waste generation rate of 3.89 pounds per square foot (lbs/sf) for non-residential uses, construction of the proposed 490,000 sf of office/commercial use, as well as demolition of 20,000 sf of existing structures and pavement would generate approximately 992 tons¹ of solid waste over the construction period. (approximately 10 years). Chapter 7, Article XVI, Waste Reduction, Reuse and Recycling of Construction and Demolition Debris, of the City's Municipal Code, outlines the requirements for diverting construction waste into landfills for every "covered project" as set forth in section 7-261(a) and (b). Construction and demolition wastes are required to be made available for deconstruction, salvage, and recovery prior to demolition. Further, demolition and construction waste requires diversion of a minimum of 65 percent of the construction and demolition debris resulting from that project in compliance with state and local statutory goals and policies and to create a mechanism to secure compliance with the stated diversion requirements.

As discussed previously, Assembly Bill 939 requires that each County and City prepare a source reduction and recycling element showing how it will meet the following solid waste diversion goals: 25 percent by the year 1995 and 50 percent by the year 2000 and every year after. In 2016, California's statewide disposal was 35.2 million tons and the population were 39.2 million residents. This resulted in a per resident disposal rate of 4.9 pounds/resident/day calculated using SB 1016's measurement system. This is slightly more than the 2015 rate of 4.7 pounds/resident/day. However, the per-resident "diversion rate equivalent" to was 63 percent in 2015 and decreased to 61 percent in 2016 (CalRecycle 2018b).

Solid Waste Generation During Operation

Long-term solid waste generation associated with operation of maximum development allowed by the proposed QVHSP is estimated in Table 4.15-2.

¹ (490,000 sf + 20,000 sf) x 3.89 lbs/sf = 1,983,900 lbs or approximately 992 tons.

**TABLE 4.15-2
ESTIMATED SOLID WASTE GENERATION**

Employees/Patients	Waste Generation Factor ^a	Waste Generation
2,687 employees ^c	12.7 pounds per day per employee	22.7 tons per day
160 patients	12.7 pounds per day	1 ton per day
Total		23.7 tons per day
sf: square feet; CalRecycle: California Department of resources Recycling and Recovery		
^a Based on waste generation factors from CalRecycle (2018c).		

The Victorville Sanitary Landfill with remaining capacity of 81,510,000 and an anticipated closure date of October 1, 2047 would accommodate the short-term disposal of construction and demolition wastes from the Project. The proposed QVHSP estimated additional solid waste requiring disposal (23.7 tons per day) represents 0.79 percent of the County landfill's daily capacity,² and one year's waste represents 0.011 percent of the remaining permitted capacity. As such, it is not anticipated that the QVHSP additional waste stream would exceed the capacity of the Victorville Landfill. Therefore, there would be less than significant impacts related to landfill capacity and no mitigation is required.

Summary of Impact. Development allowed by the proposed QVHSP would be served by a landfill with available capacity. Impacts would be less than significant, and no mitigation is required.

Threshold 15.7	Would the project comply with federal, state, and local statutes and regulations related to solid waste?
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The waste generation factors presented in Table 4.15-7 (which reflect average waste generation in 2017), are below the 50 percent disposal rate targets sets for the City by CalRecycle (4.3 pounds per day per capita and 16.7 pounds per day per employee), in compliance with AB 939 and SB 1016 (CalRecycle 2018d). The City's 2016 calculated disposal rate was 3.5 ppd for residences and 12.7 ppd for businesses. The City is in compliance with AB 939 goals and uses several programs for diversion of solid waste from landfills including programs for self-haul of waste and greenwaste, food waste composting, mobile of periodic collection, waste exchange, business waste reduction program, and special waste materials such as construction and demolition debris to achieve the diversion goal (CalRecycle 2018d). The Queen of the Valley Hospital currently participates in waste diversion programs implemented by the City and is currently in the process of developing an expanded waste management and recycling program for the campus. Operationally, the Queen of the Valley Hospital campus would continue to comply with recycling programs in compliance with applicable policies and those that have been adopted to comply with solid waste regulations such as the California Integrated Waste Management Act (AB 939). These programs would continue to be implemented by the appropriate agencies and organizations, including Athens Services, the only entity permitted to haul solid waste in the City (pursuant to Chapter 12, of the City's Municipal Code). Implementation of the QVHSP would comply with ongoing waste management programs/requirements implemented by the City (refer to Mitigation Measure UTL-4). Construction contractors would also be required comply with existing regulations for reducing solid wastes from construction, as discussed under Threshold 15.5 above (refer to Mitigation Measure UTL-5).

² Permitted Maximum Tonnage per day = 3,000. 23.7 tons per day/3,000 tons per day = 0.79 percent (CalRecycle 2018a)

Athens Services is contracted by the City for collection of solid waste and recyclables, and the QVHSP would be required to comply with ongoing waste management programs/requirements implemented by the City, as well as comply with applicable regulations, as described above. The waste recycler is also required to meet or exceed the diversion requirements set forth in AB 939. Therefore, impacts related to solid waste regulations would be less than significant. No conflict with statutes and regulations related to solid waste would occur and no mitigation is required.

As discussed in Section 4.7, *Hazards and Hazardous Materials*, hazardous wastes generated during demolition and construction would be disposed in accordance with existing regulations. Similarly, hazardous materials' use during construction and operation, including maintenance activities, would be conducted in compliance with applicable regulations.

Summary of Impacts. Construction and operation associated with implementation the proposed Project would be conducted in compliance with applicable statutes and regulations related to solid waste (refer to Mitigation Measures UTL-4 and UTL-5). Thus, impacts would be less than significant.

Mitigation Measures

UTL-4 Demolition and construction activities during implementation of the Queen of the Valley Hospital Specific Plan shall be conducted in compliance with requirements of Chapter 7, Article XVI, *Waste Reduction, Reuse and Recycling of Construction and Demolition Debris*, of the West Covina Municipal Code, which requires diversion of construction waste into landfills for every “covered project” as set forth in section 7-261(a) and (b). Construction and demolition wastes shall be made available for deconstruction, salvage, and recovery prior to demolition. Further, demolition and construction waste requires the recycling or salvage for re-use of a minimum of 65 percent of the construction and demolition debris in compliance with State and local statutory goals and policies. Prior to permit issuance, the Project applicant shall submit a “Waste Diversion Plan” shall be submitted to the Department of Public Works. The Project Applicant may be exempt from meeting the 65 percent diversion requirement if the applicant uses the city franchised hauler/collector pursuant to section 12-17 of the West Covina Municipal Code and provides the completed documentation as required by Section 7-262 including receipts and/or other documentation from the waste hauler/collector bearing the name(s) of the City of West Covina franchised hauler/collector.

UTL-5 Development in the QVHSP area shall comply with Chapter 12, *Garbage and Rubbish Collection*, of the West Covina Municipal Code, which requires that collection and disposal of refuse, recyclables or green waste shall only be conducted by entities contracted by the City to do so (either through its own employees or through an entity under exclusive franchise with the City), as identified in the Municipal Code. In addition, the Project shall comply with Article III, *Trash Enclosure District*, of the West Covina Municipal Code, outlining the regulations pertaining to proper storage and disposal of solid waste in commercial areas of the City.

4.15.5 CUMULATIVE IMPACTS

The geographic context for the cumulative impact analysis and infrastructure systems for water, recycled water, and sewer collection services is the Suburban Service Systems service area and

LACSD service area. The geographic context for the cumulative impact analysis for the solid waste is the City of West Covina.

Water Supply

Suburban Water System has supply capacities that would be sufficient to meet expected demands through 2040 under single-dry-year and multiple-dry year conditions (MNS 2016). As of 2015, Suburban Water Systems water supply portfolio for the San Jose Hills region comprised of approximately 70 percent purchased or imported water (17,066 AF), 26 percent self-produced groundwater (6,304 AF), and four 4 percent recycled water (743 AF). This supply mix remains consistent through 2040, which would be sufficient to meet future projected potable water demand within the system, including the demand from the proposed Project. Any future development meeting the applicable requirements would be required to comply with the City's water conservation requirements (refer to MM UTL-3 and MM UTL-4). Thus, cumulative impacts related to water supply would be less than significant, and no mitigation is required.

Water, Recycled Water, and Wastewater/Sewer Facilities

As discussed above, water service is provided by the supply sources available including groundwater, imported water, purchased water, and recycled water, to meet demands during normal, single-dry, and multiple-dry years. Primary sources of groundwater water supplying the Suburban Service Systems' service area are from the Main Basin and the Central Basin. Both basins are anticipated to support the same levels of water through 2040. The 2016 UWMP indicates that Suburban Water Systems will have adequate water supplies to meet demands during normal, single-dry, and multiple-dry years to 2040. The proposed Project would not contribute to a cumulatively considerable impact to water supplies.

Cumulative impacts on trunk sewer lines and wastewater treatment would occur within the service area of the LACSD. Future growth and development in the region would generate additional wastewater that would require conveyance and treatment at the WRPs of the LACSD, including the San Jose Creek WRP. This WRP currently has a remaining capacity of 36.2 mgd. Of this, the EFMP's estimated wastewater generation represents less than one percent of the remaining capacity at the San Jose Creek WRP. Also, all future development projects in the LACSD's service area would be subject to the LACSD's Wastewater Ordinance, which includes the Connection Fee program. The Connection Fee program requires all new users of the LACSD's sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The LACSD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments. Based on continued implementation of the LACSD Wastewater Ordinance and the nominal contribution of additional wastewater flows to the LACSD system, the proposed Project would not contribute to a cumulatively considerable impact to LACSD facilities. Therefore, the LACSD is expected to have adequate wastewater treatment capacity for wastewater generation by cumulative developments in its service area. No significant cumulative impact is anticipated, and buildout of uses allowed by the proposed QVHSP would not contribute to a significant cumulative impact, and no mitigation is required.

Solid Waste Disposal

Solid waste collection services are provided on demand by private haulers, and cumulative impacts on their services from future development would be determined by their service area. Available landfill capacity is expected to decrease over time with future growth and development

in the San Gabriel Valley. Waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. Also, CalRecycle is responsible for administering and monitoring State solid waste reduction initiatives, and individual jurisdiction's ability to meet these requirements. It is assumed that the role of CalRecycle would continue in the future. The Project would produce approximately 0.79 percent of the Victorville Sanitary Landfill's daily capacity and one year's waste would represent .011 percent of the remaining permitted capacity of the landfill. Based on the available capacity of landfills in the region and the nominal contribution of additional solid waste requiring disposal, the proposed Project would not contribute to a cumulatively considerable impact to landfill capacity or solid waste regulations, and no mitigation is required.

4.15.6 IMPACTS OF MITIGATION MEASURES

Implementation of Mitigation Measures UTL-1 through UTL-5 may result in initial delays in Project construction until required plans are completed, but actual implementation of the measures would not themselves result in any significant environmental impacts related to hydrology or water quality.

4.15.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures UTIL-1 through UTIL-5, Project-related impacts related to utilities and service systems would be less than significant.

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SECTION 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 INTRODUCTION

In compliance with Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, an EIR must “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives”. The City, as the CEQA lead agency, is responsible for selecting a range of project alternatives. This section identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- *The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective or would be more costly” (Section 15126.6[b]).*
- *The specific alternative of ‘no project’ shall also be evaluated along with its impact” (Section 15126.6[e][1]).*
- *The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (Section 15126.6[e][2]).*
- *The range of alternatives required in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (Section 15126.6[f]).*
- *For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (Section 15126.6[f][2][A]).*
- *If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or*

mining project which must be in close proximity to natural resources at a given locations” (Section 15126.6[f][2][B]).

- *An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (Section 15126.6[f][3]).*

Pursuant to the guidelines stated above, a range of alternatives to the proposed project is considered and evaluated in this Program EIR. These alternatives were developed in the course of Project planning and environmental review. The discussion in this section provides the following:

- A description of alternatives considered.
- A comparative analysis of the alternatives under consideration and the proposed Project. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the Project to a less than significant level.
- An analysis of whether the alternatives meet most of the objectives of the Project (as presented in Section 3.4, *Project Objectives*, of this Program EIR and restated below).

5.2 SUMMARY OF THE PROPOSED PROJECT

As described in detail in Section 3.0, *Project Description*, of this Draft EIR, the proposed Project involves the expansion of an existing community hospital over the next ten+ years. The Queen of the Valley Hospital (QVH or Hospital) currently has 1,090,000 square feet of building area on 28.7 acres and is proposing to add 490,000 square feet of new buildings to support improved or new medical services on campus. This expansion would be accomplished in approximately five phases from 2019 to 2028+ depending on need and financing. Initially four existing buildings (Marian Rooms A and B and Buildings A-C) will be demolished to make way for new buildings. This initial work would also involve adding surface parking on the former City-owned 2.8-acre Sunset Field park property adjacent to the hospital grounds. The first phase (1A) of new construction will involve expansion and new construction of the emergency room and intensive care unit (total 66,000 square feet). Phase 1B will entail construction of a new medical office building and ambulatory surgery center and a new multi-story parking structure. Phases 1A and 1B are expected to occur in the 2020–2022 timeframe. Phase 2 construction would occur from 2022–2026 and include a new 5-6 story medical tower with 132,000 square feet of new building space. Long-range improvements planned for 2028 or later would involve consolidation of the two medical towers, a new medical office building with 90,000 square feet, a second multi-story parking structure, and a new hospital building with 132,000 square feet. New buildings may be up to 6 stories tall.

The proposed Project will increase patient and support services, add several new buildings, renovate a number of existing buildings or structures onsite, and result in the demolition of a number of buildings or structures on the site. One or two stand-alone parking structures may also be included in the master planned changes to the site. Many of these changes have the potential to generate noise and air pollutants during construction and over the long-term as the hospital serves more patients and supports additional staff. These changes will generate additional traffic over both the short- and long-term as well as require additional parking. These and other possible changes on the site will be phased over a period of many years as funding is available and services are needed. The hospital may expand services into the community and may add new services as medical practices change over time (e.g., emergency helicopter service) as needs arise. These ongoing changes may have direct or indirect impacts on surrounding neighbors or the City as a whole.

The Project will require the following discretionary approvals from the City:

- Adoption of the new Queen of the Valley Hospital Specific Plan (QVHSP).
- General Plan Amendment and Zone Change to change the land use designations of the former Sunset Field city park to commercial use compatible with the Specific Plan.
- Certify EIR for proposed Specific Plan and other discretionary approvals.

5.3 PROJECT OBJECTIVES

As stated in Section 3.4, *Project Objectives*, of this Program EIR, and pursuant to Section 15124 of the State CEQA Guidelines, the following objectives have been established for the proposed Project to aid decision makers in their review of the Project.

1. Health Care Needs. Provide hospital and outpatient service resources that evolve with the health care needs of the surrounding community.
2. Economic Vitality. Provide for additional facilities and supporting uses that will create local jobs and improve the economic vitality in West Covina.
3. Sensitivity to Surrounding Neighborhood. Plan, construct, and operate the hospital campus facilities in a manner that minimizes disruptions to the surrounding neighborhood.
4. Design Character. Establish a cohesive and contemporary design character for the campus that creates a dynamic relationship between the existing and new buildings.
5. Modern Facilities. Replace outdated and obsolete buildings with modern facilities that can accommodate innovative therapies for local, national, and international patients.
6. Enhanced Campus Entrance. Create a main entrance to the campus that establishes its identity and provides a connection to the surrounding community.
7. Accessibility. Ensure that all campus facilities and pathways are accessible to all users.
8. Multimodal Access. Improve connectivity by providing enhanced pedestrian and bicycle access to encourage multimodal transportation use.
9. Transportation Facilities. Locate transportation facilities—parking, transit stops, and vehicle and pedestrian amenities—in strategic locations throughout the Specific Plan Area.
10. Facility Integration. Integrate interrelated facilities in a single site to optimize campus operations.
11. Wayfinding. Improve wayfinding for vehicles and pedestrians at campus entrances and within the campus.
12. Parking Capacity. Expand parking capacity based on anticipated future demand.
13. Green Building Standards. Maximize energy efficiency, indoor air quality, energy-efficient lighting, building orientation, and shading through local and state standards and/or through implementation of LEED principles, and ensure that new buildings on campus comply with CalGreen standards.
14. Building Systems. Replace older buildings and infrastructure that require high maintenance with more efficient, lower-maintenance, and environmentally sensitive systems.

5.4 SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis in Sections 4.1 through 4.15 of this Program EIR concludes that, despite implementation of mitigation measures, significant environmental impacts would result from the construction and operation of the proposed Project. As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the project objectives, listed above, while reducing one or more of the significant and unavoidable impacts of the project. The following significant and unavoidable impacts would result from implementation of the proposed Project:

- **Greenhouse Gases** (exceeds SCAQMD thresholds-cumulative)
- **Traffic** (Sunset Ave/Merced Ave intersection at buildout, project and cumulative)

5.5 ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the lead agency's determination. This section of the State CEQA Guidelines states "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts".

The following alternative was considered during the scoping and planning process but was not selected for detailed analysis in this Program EIR. As described in greater detail below, the main reason for rejecting this alternative was that it would not necessarily avoid or substantially reduce the impacts associated with the proposed Project, and an alternative site not already associated with an existing hospital would not be consistent with the Project's objectives.

5.5.1 MIXED USE ALTERNATIVES

The City and Hospital team looked at a number of alternative uses to the 2.8-acre Sunset Field (former) City park property including various types of residential uses, medical offices, or institutional uses. It was determined that surface parking was the most appropriate use of that property given its location, surrounding land uses, and short- and long-term needs of the hospital. Other potential non-medical land uses on the 2.8 acres were rejected as either not infeasible or inconsistent with the overall goals of the QVHSP relative to expansion of the existing hospital. The only non-medical land use for the former park property that was selected for more detailed analysis was a residential use at 20 units/acre, which is the current zoning of the property.

5.5.2 ALTERNATIVE SITES

CEQA requires that the discussion of alternatives focus on alternatives to the Project or its location, which are capable of avoiding or substantially lessening any significant effects of the Project. The key question and first step in the analysis is determining whether any of the significant effects of the Project would be avoided or substantially lessened by developing the Project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][B]).

The proposed Project is the expansion of an existing, long-established hospital at this location. Sections 4.1 through 4.15 of the Program EIR determined that the Project would result in

significant and unavoidable impacts related to greenhouse gas (GHG) emissions and transportation/traffic (long-term (2035) impacts to the intersection of Sunset Avenue/Merced Avenue even with planned improvements to other area intersections). While construction of the Project at another location might eliminate the significant traffic impact at Sunset/Merced, the long-term GHG emissions would occur regardless of location due to the size and nature of the Project. It should be noted that existing operation of the hospital already exceeds established thresholds for GHG emissions, and traffic from hospital operations without any expansion would also eventually contribute to significant cumulative traffic impacts at Sunset/Merced due to physical limitations that prevent needed improvements. In addition, the Project is an expansion of an existing hospital on the existing hospital grounds, so the Project as proposed could not occur on another site unless it was part of another hospital or medical facility.

Many of the objectives of the proposed Project involve improving facilities and services of the existing hospital, which makes moving the Project to an alternative site even more problematic and in many ways infeasible.

The Hospital management does not own other land in the City that would accommodate the proposed Project and meet the Project objectives. CEQA does not require the consideration of sites not owned by the landowner or which could not be reasonably acquired by the landowner as alternatives to the proposed project (State CEQA Guidelines, Section 15126.6[f][1]). Additionally, the Project Applicant is not involved in the acquisition or operation of any property in the City of West Covina that could serve a similar purpose as the proposed Project. Therefore, it is not anticipated that an alternative site could be developed or redeveloped to accommodate the proposed Project.

In summary, there are no alternative sites in the City that would meet Project objectives and substantially reduce or avoid significant unavoidable impacts resulting from the Project. Therefore, further analysis of an alternative site(s) in this Program EIR is not required.

5.6 ALTERNATIVES ANALYSIS

Based on the criteria listed previously, the alternatives described below have been determined to represent a reasonable range of alternatives. As described in Sections 4.1 through 4.15 of this Program EIR, the potentially significant impacts of the proposed Project can be mitigated to a less than significant level with the exception of greenhouse gas emissions and transportation/traffic (long-term impacts on the Sunset Avenue/Merced Avenue intersection). These impacts are identified as potentially significant and unavoidable.

A total of four alternatives were considered in this Program EIR. Table 5-1, Comparison of Alternatives, identifies information regarding proposed land uses, building area, etc. for the proposed Project and each of the alternatives.

- **Alternative 1 – No Project (2 versions).** This alternative addresses both types of “No Project” alternatives identified by CEQA: (1A) the No Project/No Development alternative under which the existing hospital uses continue but the proposed Project does not proceed; and (1B) No Project/Existing General Plan and Zoning Alternative, which would allow for minimal expansion of the existing hospital under the existing Specific Plan plus develop housing on the former Sunset Field property up to 20 units per acre (estimated 50 units on 2.8 acres) as permitted by the existing land use and zoning designations.
- **Alternative 2 – Reduced Intensity (50 percent).** This alternative would allow for a modest smaller expansion of the hospital by up to 250,000 square feet or approximately half of the

proposed Project. It would also allow different recreational uses on the Sunset Field property (i.e., not athletic fields) such as a dog park or skateboard park.

- **Alternative 3 – Senior Care.** This alternative would allow for minimal expansion of the hospital by approximately 125,000 square feet (25 percent) plus development of a 120,000 square foot senior housing/services complex under the Specific Plan on the 2.8-acre former Sunset Field property.

For any of the alternatives that involve new construction, it is assumed that the relevant regulatory requirements, applicable design features, and specific mitigation measures, identified under the proposed Project, would also apply and serve to reduce or avoid potentially significant impacts, similar to the proposed Project.

**TABLE 5-1
COMPARISON OF ALTERNATIVES**

Characteristic	Proposed Project	Alternative 1A No Project/ No Development	Alternative 1B No Project/ Existing General Plan and Zoning	Alternative 2 Reduced Intensity	Alternative 3 Senior Care
New Building Area	490,000 sf	0 sf	100,000 sf	250,000 sf	125,000 sf
Total Building Area	1.6 M sf	1.1 M sf	1.15 M sf	1.35 M sf	1.225 M sf
Residential Units ¹	N/A	N/A	50	N/A	N/A
Senior Care Facility ²	N/A	N/A	N/A	N/A	120,000
New Jobs Created	1,000	0	200	500	400
Total Jobs ³	2,687	1,687	1,687	2,187	1,937
sf = square feet; M = Million; N/A = Not Applicable ¹ 2.8 acres @ 20 units/acre = 20 units ² 2.8 acres @ Floor Area Ratio (FAR) of 100% (1.0) = 120,000 square feet. ³ Proposed Project staffing based on hospital estimates, No Project equals existing staffing, Alternatives 1B, 2, and 3 include pro-rated share of proposed Project staffing plus 1.5 staff per 1,000 square feet for senior care under Alternative 3.					

Table 5-2, Alternative Trip Generation Comparison, provides a summary comparison of the vehicle trips that would be generated by the proposed Project (Psomas 2018a) and each of the alternatives. Additional information regarding trip generation for each alternative is provided in the traffic discussion for each alternative.

**TABLE 5-2
ALTERNATIVE TRIP GENERATION COMPARISON**

Alternative	New Trip Generation Estimates		
	Average Daily Weekday Trips	AM Peak Hour Trips	PM Peak Hour Trips
Proposed Project (+490,000 sf expansion of 1.1 M sf hospital)	9,587	776	924
No Project/No Development (continued operation of the existing hospital)	0	0	0
No Project/Existing General Plan and Zoning (+100,000 sf or 10 percent expansion of 1.1 M sf hospital plus 50 residential units ¹ on 2.8 acres)	2,283	185	544
Reduced Intensity (+250,000 sf expansion of 1.1 M sf hospital)	4,794	388	462
Senior Care ² (+125,000 sf expansion of 1.1 M sf hospital plus 120,000 sf senior care facility on 2.8 acres)	2,900	241	289
sf: square feet			
¹ residential portion based on ITE Code 220, Multi-Family Housing (low rise, apartments) which generates 7.32 total daily trips with 7% in the AM peak and 8% in the PM peak.			
² based on ITE Code 254, Assisted Living, which has 4.19 total daily trip per 1,000 sf with 0.39 in the AM peak and 0.48 in the PM peak.			
Source: Psomas 2018a			

5.6.1 ALTERNATIVE 1A: NO PROJECT – NO DEVELOPMENT

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate a “no project” alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternative: (a) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan and (b) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed. As previously discussed, this Program EIR addresses both types of No Project alternatives.

Description of the Alternative

Under the No Project/No Development Alternative, it is assumed that the existing hospital (1.1 million square feet) would remain in operation at its current service level with no large increase or decrease in staffing (i.e., 1,687 staff) or numbers of patients and visitors (i.e., 325 beds with 58,400 annual patients served). The Sunset Field property would not be incorporated into the Hospital property, and the City may designate it for other appropriate uses in the future. Therefore, it would be speculative to assume a specific use other than continued use as some form of low intensity recreational space. Some examples of possible uses include, but are not limited to, a dog park or skateboard park but with limited nighttime hours to minimize impacts on adjacent neighbors.

Existing General Plan and Zoning

Under this alternative, the existing Hospital would continue operating at its present level of services. No existing buildings would be demolished and no new medical office or other buildings, parking structures, or supporting infrastructure improvements would be made to the property. The Sunset Field property, which was formerly a City park with athletic fields and parking, would not be added to the Hospital property for expansion of community medical services. The City would have to designate the Sunset Field property for some other appropriate use which is not known at this time, but it is likely it would continue as some form of low intensity recreational space (but probably not ballfields as it was for in the past). This alternative is fully consistent with the existing General Plan land use and zoning designations for both properties (i.e., the Hospital and Sunset Field) but would not allow for or involve any upgrades or expansion of existing hospital facilities.

Comparison of Environmental Impacts

Since this alternative involves no new development or improvements to the existing Hospital, its evaluation of potential environmental impacts is limited to the conditions that currently exist on the site, which are summarized as follows. This alternative would have no aesthetic impacts as it would not change existing views or lighting on the Hospital property. Likewise, there would be no new air pollutant emissions but existing air pollutant emissions from the Hospital would remain at approximately their current levels. Based on data and methodologies in the Air Quality and Greenhouse Gas Emissions Assessment (Psomas 2018b), Table 5-3 estimates the amount of air pollutant emissions that could be expected from the existing hospital operations. Table 5-3 shows that air pollutant emissions from the Hospital are close to but less than established SCQAQMD thresholds. Therefore, the current air pollutant emissions from the existing use are less than significant.

**TABLE 5-3
ESTIMATED NEW OPERATIONAL AIR POLLUTANT EMISSIONS
FOR THE NO PROJECT-NO DEVELOPMENT ALTERNATIVE 1A**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Proposed Project Total Operational Emissions	20.0	15.0	99.0	<1	62.0	17.0
Emissions under Alternative 1A (i.e., existing Hospital emissions ¹)	45.0	33.8	222.8	<1	139.5	38.3
SCAQMD Significance Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. ¹ Assumes the existing hospital at 1.1 MSF would be equal to a stand-alone project similar but larger than the proposed Project at +490,000 square feet (Existing Hospital = x 2.25 Proposed Project) (i.e., worse case assumption) Source: Data from Table 4.2-8, <i>Peak Daily Operational Emissions for Full Buildout Conditions</i>						

The Hospital property contains very few biological resources other than some ornamental landscaped areas and large shrubs and trees, which may provide roosting or nesting opportunities for native or migratory birds. This alternative would have no impacts on biological resources on the site, as no demolition or new construction would occur. Similarly, there are no identified cultural resources or tribal cultural resources on the site and this alternative would have no

impacts on these resources since there would be no demolition or new construction. Geologic or soil conditions would also not be impacted, as there would be no ground disturbance and no new construction.

Table 4.6-3 in Section 4.6, *Greenhouse Gas Emissions*, estimated the proposed Project would emit 13,441 tons per year of GHG emissions, which exceeds the SCAQMD GHG emissions threshold and represents a significant impact. If the existing Hospital operations were assumed to be a stand-alone project, it could generate 30,243 tons per year¹ of GHG emissions, which is also significant based on the SCAQMD threshold outlined in Section 4.6.

In its regular operation and maintenance, the Hospital uses a number of low-level hazardous materials, which would continue under this alternative. The use of these materials is regulated by various state agencies and would not be considered a significant environmental hazard. No grading or disturbance of existing ground or activities would occur under this alternative.

This alternative would maintain the existing hydrology patterns and hydrologic characteristics of the site. There would be no increase in the amount and velocity of surface runoff or potential erosion, as there would be no increase in impervious surfaces and no soils exposed during grading. All of the existing drainage infrastructure would remain in place and would not be altered under this alternative. With implementation of the regulatory requirements identified in Section 4.8, *Hydrology and Water Quality*, this alternative would have a less than significant impact related to drainage and storm drain infrastructure, similar to the conclusions for the proposed Project.

This alternative would likely result in the State Occupational Safety and Health Administration (OSHA) requiring the hospital to close due to the seismic deficiency of the main hospital. This would significantly impact emergency services as patients would have to travel farther for emergency care. While the No Project Alternative could include seismic upgrades to the building these upgrades would be expensive and there may be aesthetic impacts due to those upgrades.

There would be no potential impacts from this alternative related to land use and planning, population and housing, noise, traffic, or utilities because the existing use of the site as a community hospital would remain and there would be no expansion of medical-related uses on the site. It is likely the Sunset Field property would still have a low intensity recreational use so the potential impacts of that activity would likely not exceed the most recent use as athletic ballfields. The potential land use change on the Sunset Field property would not be significant as long as it was limited in terms of intensity and hours of use (which is assumed for this alternative).

Attainment of Project Objectives

This alternative would not involve any expansion of the hospital or its services to accommodate growth in the community. Therefore, this alternative would not achieve any of the Project's Objectives except No. 3, which is to be sensitive to surrounding neighbors and neighborhoods. Under this alternative the Hospital may be able to achieve the following Objectives to a very limited degree by incremental upgrades to existing facilities as funding becomes available:

- No. 5, Modern Facilities
- No. 7, Accessibility
- No. 12, Wayfaring
- No. 13, Green Building Standards

¹ Assumes the existing hospital with 1.1 million square feet is 2.25 times larger than the proposed Project at 490,000 square feet

- No. 14, Building Systems (replacement)

The degree to which each alternative attains the different Project Objectives is summarized in Table 5-8, Comparison of the Alternatives to the Proposed Project—Objectives, at the end of Section 5.7, *Comparison of Project Alternatives*.

Summary of the Alternative

The No Project-No Development Alternative would only allow existing activities at the Hospital to continue at their present levels with no expansion. This alternative would therefore result in no new significant environmental impacts, as there would be no demolition of existing and no construction of new buildings. Under the current SCAQMD methodology, if the existing hospital were considered as a new stand-alone project, it would generate significant greenhouse gas emissions well over the established SCAQMD threshold.

This alternative would not fully achieve any of the Project Objectives, but it is possible a number of Objectives could be achieved at least to some degree over time through incremental upgrades of existing Hospital facilities.

5.6.2 ALTERNATIVE 1B: NO PROJECT – EXISTING GENERAL PLAN AND ZONING

As outlined in the previous section, the CEQA Guidelines Section 15126.6(e) requires the evaluation of a “no project” alternative that assumes development of the project site under existing General Plan land use and zoning designations.

Description of the Alternative

Under the No Project/Existing General Plan and Zoning Alternative, it is assumed that the existing hospital (1.1 Million square feet) would remain in operation but eventually expand to a much lesser degree compared to the proposed Project (i.e., up to ten percent) and not incorporate the additional Sunset Field property. Under this alternative, the Sunset Field property would be developed with approximately 50 residential units on 2.8 acres, consistent with the existing zoning² for the property, which allows up to 20 units per acre or a maximum of 56 additional units. The residential units may include apartment building or buildings, compatible with existing apartment and office uses to the northeast and north of the Project site. This alternative would eventually see modest increases in Hospital staffing (1,856 vs. 1,687 existing staff), patient beds (360 vs. 325 existing beds), and annual patients served (64,240 vs. 58,400 existing patients) compared to existing levels.

Existing General Plan and Zoning

Implementation of this alternative would leave the existing Hospital in place and only allow for some expansion of its present levels of service. No buildings would be demolished, and minimal expansion of medical office uses would occur under this alternative. Since the Sunset Field property would not be developed for hospital uses, a new parking structure might be needed and added if it could be accommodated within the existing campus footprint. Minimal support infrastructure improvements may also occur under this alternative.

² MF-20 zone which allows up to 20 units/acre and is consistent with ITE Code 220, Multi-Family Housing (low rise, apartments)

This alternative would be partially consistent with the existing General Plan land use designation (the former Sunset Field would need a General Plan Amendment to a residential designation. However, this alternative is consistent with the zoning designations for both properties (i.e., the Hospital and Sunset Field).

Comparison of Environmental Impacts

Aesthetics

This alternative would have reduced aesthetic impacts in terms of views of new hospital buildings and increased overall lighting compared to the proposed Project. Although the details of the future apartments on the Sunset Field property is not known at this time, they would be located adjacent to and likely have a similar appearance in terms of height and size compared to the existing apartments northeast of the site. Based on findings in Section 4.1, *Aesthetics*, the potential aesthetic impacts of the Project would be less than significant with implementation of mitigation. Therefore, the aesthetic impacts of this alternative would also be less than significant assuming similar mitigation measures were implemented under this alternative.

Air Quality

This alternative would have reduced air quality impacts in terms of AQMP consistency, short-term construction-related emissions, long-term operational emissions, and cumulative emissions based on substantially fewer new buildings and reduced traffic (2,283 vs. 9,587 daily trips or 24 percent less) compared to the proposed Project. Table 5-4, below, demonstrates that the estimated operational emissions under this alternative would be substantially less than those estimated for the proposed Project, including recommended mitigation. Both of these emission levels would be less than SCAQMD daily thresholds.

**TABLE 5-4
ESTIMATED NEW OPERATIONAL AIR POLLUTANT EMISSIONS FOR THE
NO PROJECT-EXISTING GENERAL PLAN AND ZONING ALTERNATIVE 1B**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Proposed Project Total Operational Emissions	20.0	15.0	99.0	<1	62.0	17.0
Emissions under Alternative 1B ¹	4.8	3.6	23.8	<1	14.9	4.1
SCAQMD Significance Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.						
¹ Assumes only a modest increase in hospital services plus 50 additional residential units on the Sunset Field property. Total daily traffic under this alternative would increase by 2,283 trips over existing levels compared to 9,587 additional daily trips for the proposed Project.						
Source: Data from Table 4.2-8, <i>Peak Daily Operational Emissions for Full Buildout Conditions</i>						

Construction-related emissions of this alternative would also be reduced compared to the proposed Project as it would result in much less grading and new construction. Therefore, both short- and long-term air quality impacts of this alternative would be less than significant similar to the findings in Section 4.2, *Air Quality*, for the proposed Project.

Biological Resources

The Project site contains no significant biological resources in terms of native vegetation or supporting listed or otherwise sensitive wildlife species. The site is adjacent to the Walnut Creek flood control channel and includes many large trees and shrubs that could support birds, including raptors. Section 4.3, *Biological Resources*, determined that the Project would have less than significant impacts on biological resources with implementation of the recommended mitigation. This alternative would have similar impacts compared to the Project by developing the former Sunset Field property but would result in much less change, and thus fewer impacts, to the Hospital campus property (i.e., fewer new buildings and improvements). Similar to the proposed Project, this alternative would have less than significant impacts to biological resources and would likely implement similar mitigation regarding surveys for sensitive birds prior to future construction.

Cultural Resources

The Project site contains no significant cultural (historical or archaeological) resources. Section 4.4, *Cultural Resources*, determined the Project would have less than significant impacts on these resources with implementation of the recommended mitigation. This alternative would have similar impacts compared to the Project by developing the former Sunset Field property but would result in much less change to the Hospital campus property (i.e., fewer new buildings and improvements). Similar to the proposed Project, this alternative would have less than significant impacts to cultural resources and would likely implement similar mitigation (i.e., monitoring of grading).

Geology and Soils

The geologic, seismic, and soil conditions on the Project site are similar to those in the surrounding area and region. Section 4.5, *Geology and Soils*, determined the Project would have less than significant impacts associated with geological and soil constraints with proper mitigation (i.e., preparation of and adherence to site-specific geotechnical/soils studies as construction occurs). This alternative would have similar impacts relative to geology and soils and would place much less new development on the site compared to the proposed Project. Future residential uses on the former Sunset Field property would also be required to prepare appropriate geotechnical and soils studies. Therefore, this alternative would have less than significant impacts related to geology and soils, similar to the proposed Project.

Greenhouse Gas Emissions

Section 4.6, *Greenhouse Gas Emissions*, determined the proposed Project would emit 12,341 tons³ of greenhouse gases (GHGs) each year after buildout even with installation of rooftop solar panels. This level of emissions is substantially over the established SCAQMD thresholds⁴ for such projects. This alternative would produce considerably less GHG emissions (i.e., 2,962 tons) compared to the proposed Project, based largely on a reduction of daily vehicular trips (-76 percent). This level of GHG emissions would be slightly under the established SCAQMD thresholds⁴ as outlined in the previous Table 4.6-4. Therefore, this alternative would result in less than significant impact.

³ Million metric tons of carbon dioxide equivalents per year (MTCO₂e/year)

⁴ Both the Tier 3 numerical threshold of 3,000 tons and the Tier 4 efficiency threshold

Hazards and Hazardous Materials

Based on the findings in Section 4.7, *Hazards and Hazardous Materials*, the existing hospital uses a number of hazardous materials (hazmat) in its daily operations, but compliance with existing laws and regulations reduces the potential impacts to less than significant levels. In addition, Section 4.7 concluded the Project site was not subject to any significant public health or safety hazards related to flooding, fire, or airport activities, or emergency access with implementation of the recommended mitigation (i.e., procedures to follow if hazmat was found during grading). This alternative would result in less grading and new buildings compared to the proposed Project, and the change in land use of the former park site would be mainly residential on the former Sunset Field property (+50 apartments). Therefore, this alternative would have less than significant impacts with mitigation relative to hazards and hazardous materials, compared to the proposed Project.

Hydrology and Water Quality

The Walnut Creek flood control channel is adjacent and to the north of the site, but the site is not located within an identified flood zone. Construction and operational activities of the Project may increase the potential for surface water contaminants, but based on the analysis in Section 4.8, *Hydrology and Water Quality*, compliance with the recommended mitigation and existing regulatory requirements would reduce potential impacts to less than significant levels. This alternative would include construction of fewer hospital buildings and improvements but would add 50 residential units on the former Sunset Field property. With similar mitigation as the proposed Project, this alternative would have less than significant impacts related to hydrology and water quality.

Land Use

Section 4.9, *Land Use and Planning*, concluded the proposed Specific Plan and zone change (for the Sunset Field property) would be consistent with the goals and policies of the City General Plan as well as the regional goals of the Southern California Association of Governments (SCAG) regarding jobs/housing balance and reductions in vehicle miles travelled (VMT). It also concluded the Project would not conflict with existing residential uses to the northeast and north with the recommended mitigation measures in the Land Use and other EIR sections (e.g., aesthetics, air quality, etc.). This alternative would not require a Zone Change but would require a General Plan Amendment, so its land use impacts would also be less than significant, assuming equivalent mitigation was implemented on development of the former Sunset Field property.

Noise

The noise environment of the Hospital is typical of suburban communities, dominated by vehicular road noise. Section 4.10, *Noise*, determined the Project as proposed would have less than significant on-site or off-site noise and vibration impacts⁵ even without mitigation. This alternative would involve less grading, construction, and ultimate development of the Hospital site compared to the proposed Project but would add 50 residential units to the former Sunset Field property. This alternative would reduce Project-related traffic by 76 percent, so its noise impacts would similarly be less compared to the Project and less than significant.

⁵ less than a 3 decibel or dB increase in ambient levels

Population and Housing

The Project would not add any residences to the site, but this alternative would add 50 apartment units on the former Sunset Field property, which would increase the local population by approximately 125 residents assuming a population generation factor of 2.5 persons per unit. This alternative would not involve as much new construction or generate as many new staff compared to the proposed Project (200 vs. 1,000 new staff under the proposed Project). The Project would add more employment and no population, resulting in a positive effect on long-term jobs/housing balance in the City, given that the City is housing rich at present. Section 4.11, *Population and Housing*, determined the Project would have less than significant impacts related to population or housing. This alternative would not positively affect the City's jobs/housing balance, as it would introduce new residents to the City's population. Regardless, this alternative would result in less than significant impacts related to population or housing.

Public Services and Recreation

The Hospital is a critical care/emergency facility, and its expansion under the Project would require incrementally greater police, fire, and general government services. The Project would also eliminate the former Sunset Field park but would provide funds to purchase replacement parkland elsewhere in the City. Section 4.12, *Public Services*, determined the Project would have less than significant impacts on public services, including recreation, with implementation of recommended mitigation (e.g., payment of impact fees and safe facility design/construction). This alternative would include substantially less hospital-related development but 50 additional residential units. Similar to the Project, while this alternative would generate increased demand for public services. However, this alternative would require that a number of hospital services would have to be relocated out of the primary building or it would have to be seismically retrofitted which may have aesthetic impacts beyond those identified for the Project due to the required design of the upgrades. This reduction and/or loss of services would result in significant public service impacts.

Transportation and Traffic

As outlined in the previous Table 5-2, Alternative Trip Generation Comparison, the Project would generate 9,587 additional daily vehicular trips at buildout, which would result in significant impacts at the Merced Avenue/Sunset Avenue intersection both on a direct and cumulative basis even with implementation of the recommended mitigation (improvements at various intersections where feasible). Table 5-2 also shows that this alternative would generate 2,283 daily trips or 24 percent less traffic than the Project at buildout. However, Section 4.13, *Transportation/Traffic*, and the Project traffic study also pointed out that the Merced/Sunset intersection would experience significant and cumulative impacts without construction of the Project. Therefore, development of this alternative would also contribute to significant impacts at the Merced/Sunset intersection, even with implementation of mitigation equivalent to that recommended for the Project.

Tribal Cultural Resources

One local Native American tribal group provided the City with input relative to AB 52 and mitigation for future development in the City. Section 4.14, *Tribal Cultural Resources* and Section 4.4, *Cultural Resources*, recommended a number of mitigation measures to address tribal concerns, mainly monitoring of grading by a qualified archaeologist as well as tribal representatives. With the recommended mitigation, as concluded in Section 4.14, the potential impacts related to tribal cultural resources would be reduced to less than significant levels. This alternative would disturb less land (i.e., less grading) compared to the proposed Project, resulting in less than significant

impacts related to tribal cultural resources assuming implementation of mitigation equivalent to that proposed for the Project.

Utilities and Service Systems

Development of the Project would result in substantial increases in on-site water consumption, wastewater generation, energy consumption in the form of more electricity and natural gas, and the production of disposable and recyclable solid waste. It is estimated that the Project would increase these consumption levels by approximately 10 percent based on the anticipated increase in square footage of hospital-related uses. The Project would also generate a considerable amount of solid waste during construction. Section 4.15, *Utilities and Service Systems*, concluded that potential Project-related impacts on utilities and service systems would be less than significant with recommended mitigation. This alternative would result in less development of hospital-related uses but 50 additional apartments on the former Sunset Field property, which would increase demand. Overall, the potential utility impacts of this alternative would be less than the Project demand due to the reduced amount of construction and future buildings proposed. Therefore, utility impacts of this alternative would be less than significant, similar to the proposed Project.

Attainment of Project Objectives

This alternative would involve only a modest expansion (i.e., 10 percent) of the hospital and its services to accommodate growth in the community. Therefore, this alternative would not achieve any of the Project's Objectives except No. 3, which is to be sensitive to surrounding neighbors and neighborhoods. This conclusion assumes the design of the new residential units on the former Sunset Field property would not result in any incompatibility impacts with the adjacent apartments to the northeast of the hospital site. This conclusion also assumes mitigation measures equivalent to those proposed for the Project would be implemented by this alternative.

Under this alternative the Hospital may be able to achieve the following Objectives to some limited degree by upgrades to existing facilities and limited new construction in the future:

- No. 1, Health Care Needs
- No. 5, Modern Facilities
- No. 7, Accessibility
- No. 12, Wayfaring
- No. 13, Green Building Standards
- No. 14, Building Systems (replacement)

Table 5-8, Comparison of the Alternatives to the Proposed Project—Objectives, at the end of Section 5.7, *Comparison of Project Alternatives*, summarizes the degree to which each alternative attains the Project Objectives.

Summary of the Alternative

Alternative 1B – No Project – Existing General Plan and Zoning, would allow for only a modest (up to 100,000 square feet) expansion of the Hospital and development of 50 apartments on the former Sunset Field property. This alternative would reduce the significant GHG Emissions associated with the proposed Project to just under the current SCAQMD thresholds. However, the significant traffic impacts to the Merced Avenue/Sunset Avenue intersection would remain.

5.6.3 ALTERNATIVE 2: REDUCED INTENSITY (50 PERCENT)

The following alternative examines if a smaller development (approximately half of the proposed square footage) would eliminate one or both significant impacts of the proposed Project (i.e., GHG emissions and traffic).

Description of the Alternative

This alternative would allow for a more modest expansion of the hospital with an additional 250,000 square feet or approximately half of the new construction proposed by the Project. Additionally, this alternative would allow non-ballfield recreational uses, such as a dog park or skateboard park, on the former Sunset Field property.

Existing General Plan and Zoning

Similar to the proposed project, implementation of this alternative would likely require preparation of a new or highly modified Specific Plan, as this level of new construction (i.e., 250,000 square feet) was not envisioned in the existing Specific Plan. This alternative is fully consistent with the existing General Plan land use and zoning designations for both properties (i.e., the Hospital and Sunset Field). Similar to the proposed Project, this alternative is consistent with the goals and policies of the City General Plan.

Comparison of Environmental Impacts

Aesthetics

This alternative would have reduced aesthetic impacts in terms of views of new hospital buildings and increased overall lighting compared to the proposed Project. At this time, the specific type of new recreational use on the Sunset Field property is not known, and thus it would be speculative to discuss the aesthetic impacts of any future recreational use on the property. The future use would need to be designed and operated such that would not result in incompatibility impacts with the existing apartments northeast of the site. Section 4.1, *Aesthetics*, concluded that visual impacts of the Project would be less than significant with implementation of mitigation. Therefore, the aesthetic impacts of this alternative, proposing smaller development/expansion, is also anticipated to be less than significant assuming similar mitigation measures would be implemented, especially for future recreational use on the Sunset Field property.

Air Quality

This alternative would have reduced air quality impacts in terms of AQMP consistency, short-term construction-related emissions, long-term operational emissions, and cumulative emissions in light of substantially reduced new development and traffic (4,794 vs. 9,587 daily trips or 50 percent less) compared to the proposed Project. Table 5-5, Estimated New Operational Air Pollutant Emissions, below demonstrates that the estimated operational emissions under this alternative would be half of those estimated for the proposed Project, including implementation of similar mitigation as recommended for the proposed Project. The emission levels of both the proposed Project and this alternative would be less than SCAQMD daily thresholds.

**TABLE 5-5
ESTIMATED NEW OPERATIONAL AIR POLLUTANT EMISSIONS
FOR THE REDUCED INTENSITY ALTERNATIVE 2**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Proposed Project Total Operational Emissions	20.0	15.0	99.0	<1	62.0	17.0
Emissions under Alternative 2 ¹	10.0	7.5	49.5	<1	31.0	8.5
SCAQMD Significance Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. ¹ Assumes a 50 percent increase in hospital space plus relatively low intensity recreational use (but not ballfields) on the Sunset Field property. Total daily traffic under this alternative would increase by 4,794 trips over existing levels compared to 9,587 additional daily trips for the proposed Project. Source: Data from Table 4.2-8, <i>Peak Daily Operational Emissions for Full Buildout Conditions</i>						

Construction-related emissions of this alternative would also be reduced compared to the proposed Project, as it would result in much less grading and new construction. Therefore, both short- and long-term air quality impacts of this alternative would be less than significant, similar to the proposed Project.

Biological Resources

The Project site contains no significant biological resources in terms of native vegetation or supporting listed or otherwise sensitive wildlife species. The site is adjacent to the Walnut Creek flood control channel and does have many large trees and shrubs that could support birds including raptors. Section 4.3, *Biological Resources*, determined the Project would have less than significant impacts on biological resources with implementation of the recommended mitigation. This alternative would have similar impacts compared to the Project by developing the former Sunset Field property but would result in much less change to the Hospital campus (i.e., fewer new buildings and improvements). Similar to the proposed Project, this alternative would have less than significant impacts to biological resources and would likely implement similar mitigation regarding surveys for sensitive birds prior to construction.

Cultural Resources

The Project site contains no significant cultural (historical or archaeological) resources. Section 4.4, *Cultural Resources*, determined the Project would have less than significant impacts on these resources with implementation of the recommended mitigation. This alternative would have similar impacts compared to the Project by developing the former Sunset Field property but would result in much less change to the Hospital campus property (i.e., fewer new buildings and improvements). Similar to the proposed Project, this alternative would have less than significant impacts to cultural resources and would likely implement similar mitigation (i.e., monitoring of grading).

Geology and Soils

The geologic, seismic, and soil conditions on the Project site are similar to those in the surrounding area and region. Section 4.5, *Geology and Soils*, determined the Project would have less than significant impacts related to geological and soil constraints with proper mitigation (i.e.,

preparation of and adherence with site specific geotechnical/soils studies as construction occurs). This alternative would have similar impacts relative to geology and soils but would result in reduced new development on the site compared to the proposed Project. The construction of different recreational uses on the former Sunset Field property would likely be required to prepare appropriate geotechnical and soils studies. Therefore, this alternative would have less than significant impacts related to geology and soils, similar to the proposed Project.

Greenhouse Gas Emissions

Section 4.6, *Greenhouse Gas Emissions*, determined the proposed Project would emit 12,341 tons⁶ of greenhouse gases each year after buildout, which is substantially over the established SCAQMD thresholds⁷ for such projects, even with installation of rooftop solar panels. This alternative would produce considerably less GHG emissions compared to the proposed Project at approximately 6,171 tons based largely on a 50 percent reduction of daily vehicular trips compared to the proposed Project. This level of GHG emissions would still be substantially above the established SCAQMD thresholds⁴ as outlined in Table 4.6-4, in Section 4.6. Therefore, this alternative would result in a significant and unavoidable impact from GHG emissions, similar to the proposed Project, even with implementation of mitigation similar to that proposed for the Project (i.e., rooftop solar panels).

Hazards and Hazardous Materials

Section 4.7, *Hazards and Hazardous Materials*, indicated the existing hospital used a number of hazardous materials (hazmat) but that compliance with existing laws and regulations reduced potential impacts to less than significant levels. In addition, Section 4.7 concluded the Project site was not subject to any significant public health or safety hazards related to onsite hazardous materials, flooding, fire, airport activities, or emergency access with implementation of the recommended mitigation (i.e., procedures to follow if hazmat was found during grading). This alternative would result in less grading and new building compared to the proposed Project. The only changes in land use would be associated with different recreational uses on the former Sunset Field property (i.e., not ballfields). Therefore, this alternative would have similar and less than significant impacts relative to hazards and hazardous materials compared to the proposed Project and would likely implement similar mitigation.

Hydrology and Water Quality

The Walnut Creek flood control channel is adjacent and to the north of the site, but the site is not located within an identified flood zone. Construction and operational activities of the Project may increase the potential for surface water contaminants, but Section 4.8, *Hydrology and Water Quality*, concluded that compliance with the recommended mitigation and existing water quality laws and regulations would reduce potential water-related impacts to less than significant levels. This alternative would result in fewer hospital- buildings and improvements and low intensity recreational uses on the Sunset Field property. If similar mitigation was implemented, this alternative would have less than significant impacts related to hydrology and water quality, similar to the proposed Project.

Land Use

Section 4.9, *Land Use and Planning*, concluded the proposed Specific Plan and Zone Change (for the Sunset Field property) would be consistent with the goals and policies of the City General

⁶ Million metric tons of carbon dioxide equivalents per year (MTCO₂e/year)

⁷ Both the Tier 3 numerical threshold of 3,000 tons and the Tier 4 efficiency threshold

Plan as well as the regional goals of the SCAG regarding jobs/housing balance and reductions in VMT. It also concluded the Project would not conflict with existing residential uses to the northeast and north with the mitigation measures recommended in the EIR sections (e.g., aesthetics, air quality). Similar to the Project, this alternative would likely require the existing Specific Plan to be modified but would not require a General Plan Amendment or a Zone Change. This alternative would not add as many new jobs so it would not improve the City's jobs/housing balance or reduce area VMT over the long-term to nearly the same degree as the proposed Project. However, all land use impacts would still be less than significant, assuming equivalent mitigation was implemented for the development of the hospital and former Sunset Field property.

Noise

The noise environment of the Hospital is typical of suburban communities, dominated by vehicular road noise. Section 4.10, *Noise*, determined the Project as proposed would have less than significant on-site or off-site noise and vibration impacts⁸ even without mitigation. This alternative would involve less grading, construction, and ultimate development of the Hospital site compared to the proposed Project, but it would add low intensity recreational uses on the former Sunset Field property. Any facilities on this property would have to be carefully designed to minimize noise impacts on adjacent residential uses. This alternative would reduce Project-related traffic by 50 percent, so its noise impacts would similarly be less than significant.

Population and Housing

Neither the Project nor this alternative would add any residences to the site. This alternative would not involve the same level of development/construction or generate as many new staff compared to the proposed Project (500 vs. 1,000 new staff, respectively). As the Project would add more employment and no population, it would have a positive influence on long-term jobs/housing balance in the City given that the City is housing rich at present. Section 4.11, *Population and Housing*, determined the Project would have less than significant impacts related to population or housing. This alternative would improve the City's jobs/housing balance to a lesser degree in light of reduced employment compared to the Project. However, similar to the Project, this alternative would result in less than significant impacts related to population or housing.

Public Services and Recreation

The Hospital is a critical care/emergency facility and its expansion under the Project would require incrementally greater police, fire, and general government services. The Project would also eliminate the former Sunset Field park but would provide funds to purchase replacement parkland elsewhere in the City. Section 4.12, *Public Services*, determined the Project would have less than significant impacts on public services including recreation with implementation of recommended mitigation (e.g., payment of impact fees and safe facility design/construction). This alternative would allow substantially less (i.e., 50 percent) hospital-related development but would add low intensity recreational uses to the Sunset Field property (i.e., non-ballfield recreational uses). The proposed uses under this alternative would generate demand for additional public services, but to a lesser extent compared to the proposed Project. In both cases, the public service impacts would be less than significant with implementation of mitigation.

⁸ less than a 3 decibel or dB increase in ambient levels

It should be noted that this alternative could allow for new construction that meets State OSHA requirements and the critical care services could continue on the main campus without the need to construct significant seismic upgrades to the primary hospital building.

Transportation and Traffic

As outlined in the previous Table 5-2, Alternative Trip Generation Comparison, the Project would generate 9,587 additional daily vehicular trips at buildout, which would result in significant impacts at the Merced Avenue/Sunset Avenue intersection on a direct and cumulative basis even with implementation of the recommended mitigation (i.e., improvements at various intersections where feasible). Table 5-2 also shows that this alternative would generate 4,794 daily trips or 50 percent less traffic than the Project at buildout. Section 4.13, *Transportation/Traffic*, and the Project traffic study also pointed out the Merced/Sunset intersection would experience significant and cumulative congestion (impacts) even without construction of the Project. Therefore, development of this alternative would also contribute to significant impacts at the Merced/Sunset intersection, even with implementation of mitigation equivalent to that recommended for the Project.

Tribal Cultural Resources

One local Native American tribal group provided the City with input relative to AB 52 and recommended mitigation for future development in the City. Section 4.14, *Tribal Cultural Resources* and Section 4.4, *Cultural Resources*, included a number of mitigation measures to address tribal concerns, mainly monitoring of grading by a qualified archaeologist as well as tribal representatives. With the recommended mitigation, Section 4.14 determined impacts related to tribal cultural resources would be reduced to less than significant levels. This alternative would disturb less land, and thus less grading, compared to the proposed Project. It would have less than significant impacts related to tribal cultural resources assuming implementation of mitigation equivalent to that proposed for the Project.

Utilities and Service Systems

Development of the Project would result in substantial increases in on-site water consumption, wastewater generation, energy consumption in the form of more electricity and natural gas, and the production of disposable and recyclable solid waste. It is estimated the Project would increase these levels by approximately 50 percent based on the anticipated increase in square footage of hospital-related uses. The Project would also generate a considerable amount of solid waste during construction. Section 4.15, *Utilities and Service Systems*, concluded that potential impacts on utilities and service systems would be less than significant with recommended mitigation. This alternative would include less development of hospital-related uses but add low intensity recreational uses on the former Sunset Field property. Overall, utility impacts of this alternative would be less than those of the Project due to reduced development and associated demand on utilities. Therefore, utility impacts of this alternative would be less than significant, similar to the proposed Project.

Attainment of Project Objectives

This alternative would involve modest expansion of the hospital (up to 250,000 square feet or half of that of the Project). This alternative would not achieve the Project's Objectives to nearly the same degree as the proposed Project but it would be consistent with Objective No. 3, which is to be sensitive to surrounding neighbors and neighborhoods. This conclusion assumes the design of the low-intensity recreational uses on the former Sunset Field property would not result in any significant impacts by being adjacent to existing apartments northeast of the hospital site. It is

further assumed that mitigation measures equivalent to those proposed for the Project would also be implemented by this alternative.

The degree to which each alternative attains the different Project Objectives is summarized in Table 5-8, Comparison of the Alternatives to the Proposed Project—Objectives, at the end of Section 5.7, *Comparison of Project Alternatives*.

Summary of the Alternative

Alternative 2 – Reduced Intensity proposes expansion of the Hospital up to 250,000 square feet and addition of low intensity recreational uses on the former Sunset Field property. This alternative would incrementally reduce environmental impacts related to the size and amount of traffic generated compared to the Project but would not eliminate the significant impacts of the proposed Project (i.e., GHG emissions and traffic [i.e., long-term congestion at the Merced Avenue/Sunset Avenue intersection]).

5.6.4 ALTERNATIVE 3: SENIOR CARE

The following alternative examines if a substantially reduced hospital expansion in conjunction with another health care-related use on the former park site would eliminate one or both significant impacts of the proposed Project (i.e., GHG emissions and traffic).

Description of the Alternative

This alternative would allow for a much smaller expansion of the Hospital (approximately 125,000 square feet or 25 percent of the Project) plus development of a 120,000-square-foot senior housing/services complex on the 2.8-acre former Sunset Field property.

Existing General Plan and Zoning

Implementation of this alternative would not require preparation of a new or modified Specific Plan but a Zone Change may still be required for the Sunset Field property, currently zoned MF-20 (residential uses up to 20 units per acre), to a zone that would allow the senior care facility. Similar to the proposed Project, this alternative is considered to be consistent with the goals and policies of the City General Plan.

Comparison of Environmental Impacts

Aesthetics

This alternative would have reduced aesthetic impacts in terms of views of new hospital buildings, from public vantage points, and increased lighting, compared to the proposed Project. As the details of the senior care facility are not known at this time, it would be speculative to discuss the specific aesthetic impacts of the proposed use under this alternative. The senior care facility would need to be designed and operated such that would not result in incompatibility impacts with the existing apartments northeast of the site. Section 4.1, *Aesthetics*, concluded that aesthetic impacts of the Project would be less than significant with implementation of mitigation. Therefore, the aesthetic impacts of this alternative are also anticipated to be less than significant assuming similar mitigation measures would be implemented, especially for the new senior care use on the Sunset Field property.

It should be noted that under this alternative the main hospital building would still require extensive seismic retrofitting which would likely be visible on the exterior of the building, which would have

different aesthetic impacts than those identified under the proposed Project. These types of visible changes would have to be reviewed and approved at a minimum by the City Planning Commission.

Air Quality

This alternative would have reduced air quality impacts in terms of AQMP consistency, short-term construction-related emissions, long-term operational emissions, and cumulative emissions based on substantially reduced new development and traffic (2,900 vs. 9,587 daily trips or 70 percent less) compared to the proposed Project. Table 5-6, *Estimated New Operational Air Pollutant Emissions*, below demonstrates that the estimated operational emissions under this alternative would be half of those estimated for the proposed Project, including mitigation as recommended for the proposed Project. It should be noted that under both of these scenarios (i.e., proposed Project and this alternative), emission levels would be less than SCAQMD daily thresholds.

**TABLE 5-6
ESTIMATED NEW OPERATIONAL AIR POLLUTANT
EMISSIONS FOR THE SENIOR CARE ALTERNATIVE 3**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Proposed Project Total Operational Emissions	20.0	15.0	99.0	<1	62.0	17.0
Emissions under Alternative 3 ¹	6.0	4.5	29.7	<1	18.6	5.1
SCAQMD Significance Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District. ¹ Assumes a 25 percent increase in hospital space plus 120,000 square feet of senior care facilities on the Sunset Field property. Total daily traffic under this alternative would increase by 2,900 trips over existing levels compared to 9,587 additional daily trips for the proposed Project. Source: Data from Table 4.2-8, <i>Peak Daily Operational Emissions for Full Buildout Conditions</i>						

Construction-related emissions of this alternative would also be reduced compared to the proposed Project as it would result in much less grading and new construction. Therefore, both short- and long-term air quality impacts of this alternative would be less than significant, similar to the proposed Project.

Biological Resources

The Project site contains no significant biological resources in terms of native vegetation or supporting listed or otherwise sensitive wildlife species. The site is adjacent to the Walnut Creek flood control channel and does have many large trees and shrubs that could support birds including raptors. Section 4.3, *Biological Resources*, determined the Project would have less than significant impacts on biological resources with implementation of the recommended mitigation. This alternative would have similar impacts compared to the Project by developing the former Sunset Field property with a senior care facility but would result in much less change to the Hospital campus (i.e., fewer new buildings and improvements). Similar to the proposed Project, this alternative would have less than significant impacts to biological resources and would likely implement similar mitigation regarding surveys for sensitive birds prior to construction.

Cultural Resources

The Project site contains no significant cultural (historical or archaeological) resources. Section 4.4, *Cultural Resources*, determined the Project would have less than significant impacts on these resources with implementation of the recommended mitigation. This alternative would have similar impacts compared to the Project by developing the former Sunset Field property with a senior care facility but would result in much less change to the Hospital campus (i.e., fewer new buildings and improvements). Similar to the proposed Project, this alternative would have less than significant impacts to cultural resources and would likely implement similar mitigation (i.e., monitoring of grading).

Geology and Soils

The geologic, seismic, and soil conditions on the Project site are similar to those in the surrounding area and region. Section 4.5, *Geology and Soils*, determined the Project would have less than significant impacts related to geological and soil constraints with proper mitigation (i.e., preparation of and adherence with site specific geotechnical/soils studies as construction occurs). This alternative would have similar impacts relative to geology and soils but would result in reduced new development on the site compared to the proposed Project. The construction of senior care facilities on the former Sunset Field property would likely be required to prepare appropriate geotechnical and soils studies. Therefore, this alternative would have less than significant impacts related to geology and soils, similar to the proposed Project.

Greenhouse Gas Emissions

Section 4.6, *Greenhouse Gas Emissions*, determined the proposed Project would emit 12,341 tons⁹ of greenhouse gases each year after buildout, which is substantially over the established SCAQMD thresholds¹⁰ for such projects, even with installation of rooftop solar panels. This alternative would produce considerably less GHG emissions compared to the proposed Project at approximately 3,702 tons based largely on a 70 percent reduction of daily vehicular trips compared to the proposed Project. This level of GHG emissions would still be above the established SCAQMD thresholds⁴ as outlined in the Table 4.6-4 in Section 4.6. Therefore, this alternative would result in significant and unavoidable impact from GHG emissions, similar to the proposed Project, even with implementation of the mitigation recommended for the Project (i.e., rooftop solar panels).

Hazards and Hazardous Materials

Section 4.7, *Hazards and Hazardous Materials*, indicated the existing hospital used a number of hazardous materials (hazmat) but that compliance with existing laws and regulations reduced potential impacts to less than significant levels. In addition, Section 4.7 concluded the Project site was not subject to any significant public health or safety hazards related to onsite hazardous materials, flooding, fire, or airport activities, or emergency access with implementation of the recommended mitigation (i.e., procedures to follow if hazmat was found during grading). This alternative would result in less grading and new building compared to the proposed Project. The only change in land use would be associated with development of a new senior care facility on the former Sunset Field property. Therefore, this alternative would have similar and less than significant impacts relative to hazards and hazardous materials compared to the proposed Project and would likely implement similar mitigation.

⁹ Million metric tons of carbon dioxide equivalents per year (MTCO₂e/year)

¹⁰ Both the Tier 3 numerical threshold of 3,000 tons and the Tier 4 efficiency threshold

Hydrology and Water Quality

The Walnut Creek flood control channel is adjacent and to the north of the site, but the site is not located within an identified flood zone. Construction and operational activities of the Project may increase the potential for surface water contaminants, but Section 4.8, *Hydrology and Water Quality*, concluded that compliance with the recommended mitigation and existing water quality laws and regulations would reduce potential water-related impacts to less than significant levels. This alternative would result in fewer hospital buildings and improvement in addition to a senior care facility on the former Sunset Field property. If similar mitigation was implemented, this alternative would have less than significant impacts related to hydrology and water quality, similar to the proposed Project.

Land Use

Section 4.9, *Land Use and Planning*, concluded the proposed Specific Plan and Zone Change (for the Sunset Field property) would be consistent with the goals and policies of the City General Plan as well as the regional goals of the SCAG regarding jobs/housing balance and reductions in VMT. It also concluded the Project would not conflict with existing residential uses to the northeast and north with the mitigation measures recommended in the EIR sections (e.g., aesthetics, air quality). Similar to the Project, this alternative would likely require the Specific Plan to be modified and would require a General Plan Amendment. However, a Zone Change would not be required to accommodate the proposed senior care facility as it is consistent with the existing MR-20 zone on the former Sunset Field property. This alternative would not add as many jobs and would increase City residents so it would not improve the City's jobs/housing balance or reduce area VMT over the long-term to nearly the same degree as the proposed Project. However, all land use impacts would still be less than significant, assuming equivalent mitigation was implemented for the development of the hospital and former Sunset Field property.

Noise

The noise environment of the Hospital is typical of suburban communities, dominated by vehicular road noise. Section 4.10, *Noise*, determined the Project as proposed would have less than significant on-site or off-site noise and vibration impacts¹¹ even without mitigation. This alternative would involve less grading, construction, and ultimate development of the Hospital site compared to the proposed Project, but it would add a senior care facility on the former Sunset Field property. Any facilities on this property would have to be carefully designed to minimize noise impacts on adjacent residential uses. This alternative would reduce Project-related traffic by 70 percent, so its noise impacts would similarly be less than significant.

Population and Housing

This alternative would not involve the same level of development/construction or generate as many new staff compared to the proposed Project (400 vs. 1,000 new staff, respectively). The Project would not add any residences to the site, but this alternative could add several hundred long-term care patients/residents at the new senior care facility. As the Project would add more employment and no population, it would have a positive influence on long-term jobs/housing balance in the City given that the City is housing rich at present. Section 4.11, *Population and Housing*, determined the Project would have less than significant impacts related to population or housing. Compared to the Project, this alternative would improve the City's jobs/housing balance to a lesser degree in light of reduced employment at the Hospital although there will also be

¹¹ less than a 3 decibel or dB increase in ambient levels

additional future employment at the senior care facility. Similar to the Project, this Alternative would result less than significant impacts related to population or housing.

Public Services and Recreation

The Hospital is a critical care/emergency facility and its expansion under the Project would require incrementally greater police, fire, and general government services. The Project would also eliminate the former Sunset Field park but would provide funds to purchase replacement parkland elsewhere in the City. Section 4.12, *Public Services*, determined the Project would have less than significant impacts on public services including recreation with implementation of recommended mitigation (e.g., payment of impact fees and safe facility design/construction). This alternative would allow substantially less (i.e., 25 percent) hospital-related development but would add a senior care facility, which typically has a lower public service demand, with the possible exception of emergency medical services, than typical residential or commercial land uses. The proposed uses would generate demand for additional public service, but to a lesser extent compared to the proposed Project. In both cases, the public service impacts would be less than significant with implementation of mitigation.

It should be noted that this alternative would still require the primary hospital building to undergo seismic retrofitting to continue operation.

Transportation and Traffic

As outlined in the previous Table 5-2, Alternative Trip Generation Comparison, the Project would generate 9,587 additional daily vehicular trips at buildout, which would result in significant impacts at the Merced Avenue/Sunset Avenue intersection on a direct and cumulative basis even with implementation of the recommended mitigation (i.e., improvements at various intersections where feasible). Table 5-2 also shows that this alternative would generate 2,900 daily trips or 70 percent less traffic than the Project at buildout. Section 4.13, *Transportation/Traffic*, and the Project traffic study also pointed out the Merced/Sunset intersection would experience significant and cumulative congestion (impacts) even without construction of the Project. Therefore, development of this alternative would also contribute to significant impacts at the Merced/Sunset intersection, even with implementation of mitigation equivalent to that recommended for the Project.

Tribal Cultural Resources

One local Native American tribal group provided the City with input relative to AB 52 and recommended mitigation for future development in the City. Section 4.14, *Tribal Cultural Resources* and Section 4.4, *Cultural Resources*, included a number of mitigation measures to address tribal concerns, mainly monitoring of grading by a qualified archaeologist as well as tribal representatives. With the recommended mitigation Section 4.14 determined impacts related to tribal cultural resources would be reduced to less than significant levels. This alternative would disturb less land, and thus less grading, compared to the proposed Project. It would have less than significant impacts related to tribal cultural resources assuming implementation of mitigation equivalent to that proposed for the Project.

Utilities and Service Systems

Development of the Project would result in substantial increases in on-site water consumption, wastewater generation, energy consumption in the form of more electricity and natural gas, and the production of disposable and recyclable solid waste. It is estimated the Project would increase these levels by approximately 25 percent based on the anticipated increase in square footage of

hospital-related uses. The Project would also generate a considerable amount of solid waste during construction. Section 4.15, *Utilities and Service Systems*, concluded that potential impacts on utilities and service systems would be less than significant with recommended mitigation. This alternative would include less development of hospital-related uses but add senior care facilities on the former Sunset Field property. Overall, utility impacts of this alternative would be less than those of the Project due to reduced development and associated demand on utilities. Therefore, utility impacts of this alternative would be less than significant, similar to the proposed Project.

Attainment of Project Objectives

This alternative would involve expansion of the hospital up to 125,000 square feet or a quarter of the Project's proposed expansion. This alternative would not achieve the Project's Objectives to nearly the same degree as the proposed Project but would be consistent with Objective No. 3, which is to be sensitive to surrounding neighbors and neighborhoods. This conclusion assumes the design of the senior care facility on the former Sunset Field property would not result in any significant impacts by being adjacent to existing apartments northeast of the hospital site. It is further assumed that mitigation measures equivalent to those proposed for the Project would also be implemented by this alternative.

The degree to which each alternative attains the different Project Objectives is summarized in Table 5-8, Comparison of the Alternatives to the Proposed Project—Objectives, at the end of Section 5.7, *Comparison of Project Alternatives*.

Summary of the Alternative

Alternative 3 – Senior Care would allow for an expansion of the hospital up to 125,000 square feet and addition of a senior care facility to the former Sunset Field property. This alternative would incrementally reduce environmental impacts related to the size and amount of traffic compared to the Project but would not eliminate the significant impacts of the proposed Project (i.e., GHG emissions and traffic [long-term congestion at the Merced Avenue/Sunset Avenue intersection]).

5.7 COMPARISON OF PROJECT ALTERNATIVES

Based on the preceding analysis, Table 5-7, Comparison of Project Alternatives, compares the impacts of the build alternatives with those of the proposed Project. This table identifies whether or not the alternatives result in a reduction of the impact, a greater impact than the Project, or the same impact as the Project. The impacts of the respective alternatives are identified followed parenthetically by the comparison to the impact of the proposed Project. The only alternative that reduces any of the Project's significant impacts is the No Project – Existing General Plan and Zoning (Alternative 1B), which reduces GHG emissions to just under the established SCAQMD numerical (Tier 3) threshold.

In addition, Table 5-8, Comparison of the Alternatives to the Proposed Project – Objectives, compares if or to what degree the various alternatives achieve the Project objectives compared to the proposed Project.

**TABLE 5-7
COMPARISON OF THE ALTERNATIVES TO THE PROPOSED PROJECT – IMPACTS**

Environmental Issue	Proposed Project	<u>Alternative 1A</u> No Project/ No Development	<u>Alternative 1B</u> No Project/ Existing General Plan and Zoning	<u>Alternative 2</u> Lower Intensity (50%)	<u>Alternative 3</u> Senior Care (25%)
Aesthetics					
Construction	LTS	NI	LTS	LTS	LTS
Operation	LTS	NI	LTS	LTS	LTS
Air Quality					
Construction	LTS	NI	LTS	LTS	LTS
Operation	LTS	NI	LTS	LTS	LTS
Cumulative	LTS	NI	LTS	LTS	LTS
AQMP Consistency	LTS	NI	LTS	LTS	LTS
Biological Resources	LTS	NI	LTS	LTS	LTS
Cultural Resources	LTS	NI	LTS	LTS	LTS
Geology and Soils	LTS	NI	LTS	LTS	LTS
Greenhouse Gas Emissions	SU	NI¹	LTS	SU	SU
Hazards and Hazardous Materials	LTS	NI	LTS	LTS	LTS
Hydrology and Water Quality	LTS	NI	LTS	LTS	LTS
Land Use and Planning	LTS	NI	LTS	LTS	LTS
Noise					
Construction	LTS	NI	LTS	LTS	LTS
Operation	LTS	NI	LTS	LTS	LTS
Population and Housing	LTS	NI	LTS	LTS	LTS
Public Services and Recreation	LTS	SU	SU	LTS	LTS
Transportation and Traffic					
Construction	LTS	NI	LTS	LTS	LTS
Operation	SU	NI	LTS	SU	SU
Tribal Cultural Resources	LTS	NI	LTS	LTS	LTS
Utilities and Service Systems	LTS	NI	LTS	LTS	LTS
AQMP: Air Quality Management Plan; LTS: Less Than Significant; NI = No Impact; SU : Significant and Unavoidable					
¹ assuming the existing Hospital was considered as a stand-alone new project, GHG emissions would far exceed the established SCAQMD thresholds					

**TABLE 5-8
COMPARISON OF THE ALTERNATIVES TO THE PROPOSED PROJECT – OBJECTIVES**

Project Objective	Proposed Project	Alternative 1A No Project/ No Development	Alternative 1B No Project/ Existing General Plan and Zoning	Alternative 2 Lower Intensity (50%)	Alternative 3 Senior Care (25%)
1. Health Care Needs. Provide hospital and outpatient service resources that evolve with the health care needs of the surrounding community.	Yes	No	Minimal	Reduced	Reduced
2. Economic Vitality. Provide for additional facilities and supporting uses that will create local jobs and improve the economic vitality in West Covina.	Yes	No	No	Reduced	Reduced
3. Sensitivity to Surrounding Neighborhood. Plan, construct, and operate the hospital campus facilities in a manner that minimizes disruptions to the surrounding neighborhood.	Yes	Yes	Yes	Yes	Yes
4. Design Character. Establish a cohesive and contemporary design character for the campus that creates a dynamic relationship between the existing and new buildings.	Yes	No	No	Reduced	Reduced
5. Modern Facilities. Replace outdated and obsolete buildings with modern facilities that can accommodate innovative therapies for local, national, and international patients.	Yes	Minimal	Minimal	Reduced	Reduced
6. Enhanced Campus Entrance. Create a main entrance to the campus that establishes its identity and provides a connection to the surrounding community.	Yes	No	No	Reduced	Reduced
7. Accessibility. Ensure that all campus facilities and pathways are accessible to all users.	Yes	Minimal	Minimal	Reduced	Reduced
8. Multimodal Access. Improve connectivity by providing enhanced pedestrian and bicycle access to encourage multimodal transportation use.	Yes	No	No	Reduced	Reduced
9. Transportation Facilities. Locate transportation facilities—parking, transit stops, and vehicle and pedestrian amenities—in strategic locations throughout the Specific Plan Area.	Yes	No	No	Reduced	Reduced
10. Facility Integration. Integrate interrelated facilities in a single site to optimize campus operations.	Yes	No	No	Reduced	Reduced
11. Wayfinding. Improve wayfinding for vehicles and pedestrians at campus entrances and within the campus.	Yes	No	No	Reduced	Reduced
12. Parking Capacity. Expand parking capacity based on anticipated future demand.	Yes	Minimal	Minimal	Reduced	Reduced
13. Green Building Standards. Maximize energy efficiency, indoor air quality, energy-efficient lighting, building orientation, and shading through local and state standards and/or through implementation of LEED principles, and ensure that new buildings on campus comply with CalGreen standards.	Yes	Minimal	Minimal	Reduced	Reduced
14. Building Systems. Replace older buildings and infrastructure that require high maintenance with more efficient, lower-maintenance, and environmentally sensitive systems.	Yes	Minimal	Minimal	Reduced	Reduced
Summary of Attaining Project Objectives Compared to the Proposed Project	YES	LOW	LOW	MODERATE	MODERATE

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The No Project/Existing General Plan and Zoning Alternative has the least impact to the environment and would avoid significant and unavoidable impacts of the Project associated with GHG emissions (i.e., exceeds SCAQMD Tier 3 and 4 thresholds). However, cumulative traffic impacts related to congestion at the Merced Avenue/Sunset Avenue intersection would remain significant under this alternative. This alternative would also create significant public service impacts by reducing hospital services from not constructing needed seismic improvements to the main hospital building.

Both the Reduced Intensity Alternative 2 and Senior Care Alternative 3 reduce the overall level of impacts of the Project by reducing anticipated long-term traffic (50 and 70 percent, respectively), but neither alternative reduces any of the significant impacts of the Project (GHG emissions and traffic at Merced/Sunset). All of the proposed alternatives are generally consistent with the policies and actions in the City's General Plan, although using the Sunset Field property for uses other than medium density residential or open space would require a Zone Change.

While the No Project/Existing General Plan and Zoning Alternative is environmentally superior to the proposed Project, it does not meet the project objectives to nearly the same degree as the proposed project. Notably, this alternative would not allow the Hospital to expand to meet the anticipated health care needs of the community in the future, and the former Sunset Field property would only be used for low intensity recreation, which may not be the highest and best use for this property given its location and adjacent uses. In addition, the No Project Alternative would not allow for seismic rehabilitation for existing buildings and would eventually curtail the services that could be offered by the Hospital. Additionally, this alternative would not help achieve long-term regional goals of jobs/housing balance and VMT reduction to nearly the same degree as the proposed Project.

5.9 REFERENCES

———. 2016b. Final Environmental Impact Report, 2016 General Plan Update and Downtown Plan and Code. Rincon Consultants, Inc. Adopted December 2016.

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SECTION 6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project (including planning, acquisition, development, and operation) be considered when evaluating the project's impact on the environment. Section 15126 also sets forth general content requirements for environmental impact reports (EIRs). This section identifies (1) significant irreversible environmental changes that would result from implementing the proposed project; (2) growth-inducing impacts of the proposed project; and (3) potential energy impacts of the proposed project.

6.1 **SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED**

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if the following occurs:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Determining whether the proposed project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project site has historically been used for health care-related uses and before that for agricultural purposes. The site has already been permanently altered by construction and operation of the existing hospital, and the proposed Project would continue and expand the overall use of the site for similar purposes (i.e., health care). The site contains no identified significant or sensitive environmental resources, so there would be no loss or substantial impacts to important environmental resources as a result of the Project.

Construction and long-term operation of the proposed Project would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including petroleum fuels and

natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures) as well as lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction and utility infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Project implementation; these include air quality (through the combustion of fossil fuels and production of greenhouse gases) and water supply (through the increased potable water demands for drinking, cleaning, landscaping, and general maintenance needs).

An incremental increased commitment of public services and utilities (e.g., police, fire, sewer, and water services) would also be required. Project development is a continued irreversible commitment of the land, energy resources, and public services. After the 50- to 75-year structural lifespan of the buildings is reached, it is improbable that the site would revert to permanently undeveloped conditions due to the large capital investment that will already have been committed.

6.2 GROWTH-INDUCING IMPACTS OF THE PROPOSED ACTION

CEQA requires that EIRs include a discussion of ways in which a proposed project could induce growth. The State CEQA Guidelines identify a project as “growth inducing” if it fosters economic or population growth or if it encourages the construction of additional housing either directly or indirectly in the surrounding environment (State CEQA Guidelines, Section 15126.2[d]). New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

To address this issue, potential growth-inducing effects are examined through analysis of the following questions:

1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?
2. Would this project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

A project could indirectly induce growth by reducing or removing barriers to growth, or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, the potential for growth inducement is not considered necessarily detrimental nor necessarily beneficial, and neither is it automatically considered to be of little significance to the environment. This issue is presented to provide additional information on ways in which the proposed Project could contribute to significant changes in the environment, beyond the direct consequences of implementing the proposed Project examined in the preceding sections of this Program EIR.

1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?

The Project site is already served by existing roadways although onsite parking areas and access routes may be improved as Project improvements occur. As outlined in Section 4.13, *Transportation/Traffic*, the Project would need to improve or make fair share contributions to various improvements at a number of local intersections during the phasing of Project improvements. However, these are not considered removing obstacles to growth but rather the natural accommodation of overall growth in the community, which is planned for and outlined in the City's General Plan (i.e., the "Circulation Element"). The overall effect of Project improvements will be an incremental ability of the City to better accommodate the level of growth outlined in the General Plan.

The Project does request a change in land use designations onsite (General Plan and zoning) mainly to accommodate the new Specific Plan and inclusion of the former Sunset Field park property into the Hospital property. The additional planned medical office and other Project-related uses would support the expansion of health care services offered by the Hospital in the future. The Queen of the Valley Hospital is long established and has been providing health services to the community for many years, so the Project does not represent unplanned or unexpected growth.

The Project site already has substantial infrastructure in place relative to various utilities. As identified in Section 4.15, *Utilities and Service Systems*, the proposed Specific Plan would not involve development that would require or establish the need for new or substantially increased public services or utility/service systems. The Project site and surrounding areas are already served by essential public services and an extensive network of utility/service systems and other necessary infrastructure to accommodate or allow the existing conditions and planned growth.

The utility infrastructure improvements that would be installed as part of the Project would be sized and located expressly to serve the proposed uses of the Project, and therefore would not induce growth in the surrounding area. Furthermore, other future development would be reviewed on a project-by-project basis in order to determine the utility/service systems necessary to serve the specific proposed land uses.

For the reasons listed above, the proposed Project is not considered to be growth-inducing with respect to removal of obstacles to growth. The reader is also referred to the discussion of Item 3 below, which addresses potential opportunities for redevelopment, revitalization, or intensification of areas in the vicinity of the Project site.

2. Would this project result in the need to expand one or more public services to maintain desired levels of service?

As discussed in Section 4.12, *Public Services and Recreation*, of this Program EIR, the proposed Project would only incrementally increase the demand for public services (police, fire, schools, libraries, and parks and recreational facilities). As detailed under police, fire, schools, libraries, and parks, the proposed expansion of hospital associated facilities onsite would not result in increased demand such that would result in significant impacts. The Project would not introduce any new housing or substantial additional commercial or industrial uses that would require additional public services beyond the services currently in place to accommodate the Queen of the Valley Hospital uses. Additionally, funding mechanisms are in place through existing regulations and standard

practices to accommodate growth in the City, including the proposed Project. Therefore, this Project would not have significant growth-inducing consequences with respect to public services.

3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

During Project construction, a number of design, engineering, and construction-related jobs would be created. This would last until Project construction is completed (assumed to be up to ten years or more). In addition, the hospital currently employs a total of 1,687 workers and full buildout of the proposed Project would be expected to add approximately 1,000 (+60 percent) additional workers in all categories (e.g., support, administration, nursing, doctors, etc.). This growth in employment would be an indirect, growth-inducing effect of the proposed Project.

As further discussed in Section 4.11, *Population and Housing*, of this Program EIR, buildout of the maximum amount of development allowed by the proposed Queen of the Valley Hospital Specific Plan would not result in any new housing or population effects, although increased employment at the hospital may have indirect effects on the local population and housing if new residents move into the City as a result of new employment opportunities at the hospital. However, the Project is not anticipated to increase local housing and/or population above that already anticipated in the City of West Covina General Plan or in SCAG's 2012-2035 Regional Growth Forecasts. It is expected that some of the short-term construction jobs and new positions during operation would be filled by workers who already reside in the local area or region. However, it would be overly speculative to estimate how many of the future new employees would become new residents in the City.

It should also be noted there is a lack of vacant land in the general vicinity of the hospital, so it is unlikely that development of the proposed Project would accelerate development of nearby vacant land.

For these reasons, implementation the proposed Specific Plan would mainly facilitate the growth already envisioned in and planned for by the City of West Covina in its General Plan.

4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

As identified above, the proposed Project involves a General Plan Amendment and Zone Change for the former Sunset Field (park) property mainly to assist in providing additional surface parking for the future hospital buildings. In addition, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement this Project. The Project would comply with existing laws and regulatory requirements, as well as the various Mitigation Measures that have been identified in Sections 4.1 through 4.15 of this Program EIR. This would ensure that implementation of the Project complies with all applicable City plans, policies, and ordinances; that there would be no conflicts with adopted land development regulations; and that environmental impacts are minimized. The Project proposes uses that are consistent with existing uses and does not propose any precedent-setting actions that, if approved, would specifically allow or encourage other projects and resultant growth to occur.

6.3 ENERGY CONSERVATION

Section 21100(b)(3) of the *California Public Resources Code* and Appendix F to the State CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

- (1) Decreasing overall per capita energy consumption,
- (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
- (3) Increasing reliance on renewable energy sources.

Appendix F of the State CEQA Guidelines also identifies that “EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy”.

Section 4.15, *Utilities and Service Systems*, of the General Plan EIR, identifies General Plan Policies and Actions to promote energy efficiency and use of alternative energy sources as part of implementing future growth in the City. The consistency of the proposed Project with these goals and policies is discussed in Section 4.9, *Land Use and Planning*, of this Program EIR.

The Project is expansion or improvement of existing hospital uses in an infill location and already surrounded by residential and commercial development. The site is in walking distance to retail stores and restaurants, reducing the need for vehicle use to these destinations, which is representative of the efficient land use development that reduce vehicle trips and their associated energy use. The site also has access via a short drive to the local Metrolink Station to the north in Baldwin Park.

The analysis in this section utilizes the data and assumptions from air quality and greenhouse gas (GHG) analyses evaluated in Section 4.2, *Air Quality* and Section 4.6, *Greenhouse Gas Emissions*, respectively, and Appendix C of this Program EIR. Because the California Emissions Estimator Model (CalEEMod) program used in these technical analyses, does not display the amount and fuel type for construction-related sources, additional calculations were conducted and are summarized below. Other computer data models that were used include the California Air Resources Board’s Offroad model for offroad construction vehicles as well as the EMFAC model for roadway vehicles.

6.3.1 SHORT-TERM CONSTRUCTION

Project construction would require the use of construction equipment for grading, hauling and building activities; all off-road construction equipment is assumed to use diesel fuel. Construction also includes the vehicles of construction workers and vendors traveling to and from the Project site and on-road haul trucks for the export of materials from site clearing and demolition and the export and import of soil for grading.

Off-road construction equipment use was calculated from the equipment data (mix, hours per day, horsepower, load factor, and days per phase) provided in the CalEEMod construction output files included in Appendix C of this Program EIR. The total horsepower hours for the Project was then multiplied by fuel usage estimates per hours of construction activities included in the CalEEMod modeling.

Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding miles per gallon factor using California Air Resources Board's (CARB's) EMFAC 2014 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks.

As shown in Table 6-1, the Project would consume a total 495,939 gallons of diesel fuel and 669 gallons of gasoline during construction, based on the nature and setting for this Project (i.e. urban hospital).

**TABLE 6-1
ENERGY USE DURING CONSTRUCTION**

Source	Gasoline - gallons	Diesel Fuel - gallons
Off-road Construction Equipment	0	204,457
Worker commute	567	1
Vendors	98	2
On-road haul	4	279
Total	669	204,739
Sources: Psomas 2019 based on data from CalEEMod, Offroad and EMFAC2014.		

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Project would also implement Mitigation Measure AIR-2 (Section 4.2, Air Quality), which requires equipment to be properly maintained, minimize idling, and use electric or clean alternative fuel equipment, where feasible. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than comparable equipment at construction sites in other parts of the State. Energy used in the construction of the Project would enable the development of buildings that meet the latest energy efficiency standards, as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

6.3.2 TRANSPORTATION

As further discussed in Section 4.9, *Land Use and Planning*, the Southern California Association of Governments' (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City of West Covina General Plan include goals and policies that encourage transit-oriented and mixed-use development to reduce daily vehicle trips and VMT. As identified in Section 3.0, Project Description, the proposed Specific Plan encourages non-vehicular access and less dependency on the automobile. However, the hospital cannot control how its patients and visitors travel to and from the hospital.

As further described in Section 3.0, *Project Description*, the overall circulation concept for the proposed Project places an emphasis on pedestrian, bicycle, and vehicular connectivity, although the closest Metrolink Transit Station is 1.5 miles north of the site in Baldwin Park. By adding employment and expanded medical services in a housing rich area, the Specific Plan would eventually result in an incremental reduction in the number and length of vehicle trips and an associated reduction in GHG emissions and an increase in energy conservation. It is estimated that the Project-generated traffic would use 24,005 gallons of diesel fuel, and 641,855 gallons of

gasoline per year (see Table 6-2). Fuel consumption associated with vehicle trips generated by the proposed Project would not be considered inefficient, wasteful, or unnecessary.

**TABLE 6-2
ENERGY USE DURING OPERATIONS**

Land Use	Gasoline	Diesel	Natural Gas (kBTU/yr)	Electricity (kWh/yr)
Hospital Buildings	321,237	13,149	9,701,050	5,305,650
Medical Office Buildings	320,618	10,857	936,900	1,799,316
Total	641,855	24,005	10,637,950	7,104,966
Sources: Psomas 2019				

6.3.3 ENERGY DEMAND

As identified in Section 4.6, *Greenhouse Gas Emissions*, Title 24 of the *California Code of Regulations* (CCR, specifically, Part 6) is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The current applicable standards are the 2016 Standards.

The 2016 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools, and hospitals) throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The proposed Project would promote building energy efficiency through compliance with energy efficiency standards (Title 24 and CALGreen) and providing energy efficiency measures that exceed required standards. Based on the CalEEMod, the electricity demand from the Project would be approximately 7.1 million kilowatt hours per year (kWh/yr), and the natural gas consumption would be approximately 10.6 billion British Thermal Units per year (BTU/yr), which includes peak demands. The 2019 Title 24 standards would reduce energy consumption by approximately 30 percent over the 2016 standards (CEC 2018). Because the Project proposes expanded medical services to meet the needs of the local population, they would not need to travel further to obtain these services. Based on the above, the proposed Project is not expected to result in excessive long-term operational building energy demand.

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SECTION 7.0 SUMMARY OF ENVIRONMENTAL EFFECTS

7.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines states that “an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.” As discussed in Section 2.0, *Introduction*, the NOP for the proposed Project indicated that all potential environmental issues and impacts of the Project would be evaluated in the Draft Program EIR (see Appendix A). However, the Queen of the Hospital Specific Plan (QVHSP) Project site does not contain any resources related to Agriculture and Forestry Resources and Mineral Resources. Therefore, these two environmental topics are not included or analyzed in Section 4.0 of this Program EIR. The following provides a discussion and justification as to why these are not evaluated further in this Program EIR. For a discussion of all the environmental effects, which were found to be less than significant, refer to Section 7.1 of this document.

7.1.1 AGRICULTURE AND FORESTRY RESOURCES

- **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to Non-Agricultural Use:** Pursuant to the 2016 California Department of Conservation, Farmland Mapping and Monitoring Program (CDC 2016a), the entire City, including the Project site are designated “Urban and Built-Up Land”. These categories are not considered “Farmland” under CEQA. Because the Project site is not designated as Prime, Unique, or Statewide Important Farmland, no impact would occur.
- **Conflict with Agricultural Zoning or a Williamson Act Contract:** Pursuant to the California Department of Conservation, Williamson Act Program (CDC 2016b), the entire City, including the Project site is designated as “Non-Enrolled Land” under the Williamson Act Program, which includes land not enrolled in a Williamson Act contract and not mapped by Farmland Mapping & Monitoring Program (FMMP). The Project site is currently designated as “Specific Plan” (SP-1) and “MF-20 - Residential 20 du/ac”. The proposed Project includes a new Specific Plan document that would supersede the previously adopted QVHSP. The Project proposes to amend the City’s zoning map to change the zoning for the northeastern portion of the Project site from “MF-20 - Residential 20 du/ac” to “Specific Plan”. Further, the proposed Project is consistent with the zoning for the Hospital property and the City has approved conversion of the Sunset Field property to hospital-related uses under the QVHSP. Neither the City’s General Plan nor the QVHSP envision future use of the Project site as agricultural land. Because the Project site and surrounding areas are not zoned for agricultural uses, implementation of the proposed Project would not conflict with zoning for agricultural uses. Also, the Project site is not covered under a Williamson Act Contract; therefore, implementation of the Project would not conflict with any Williamson Act Contract.
- **Conflict with Zoning for Forest Land or Timberland, Cause Forest Land or Timberland to Be Rezoned, or Result in the Loss or Conversion of Forest Land to Non-Forest Use:** The Fire and Resource Assessment Program (FRAP), maintained by the California Department of Forestry and Fire Protection (CDFFP), indicates the entire City, including the Project site, does not contain any forest or forest-related resources. Therefore, the proposed Project would not conflict with existing forest zoning; cause rezoning of forest land; or result in the loss or conversion of forest lands to non-forest uses.

- **Involve Other Changes that Could Result in Conversion of Farmland or Forest Land:** Due to the lack of existing farmland, forest lands, or areas zoned for agriculture, or timberlands on the Project site or in the immediately surrounding areas, development of the Project site would not involve changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. The Project site is developed with hospital and medical service-related uses except for the former Sunset Field City park site on approximately 3 acres at the northern portion of the Project site. The property, currently developed as athletic fields, contains some ornamental trees but would be redeveloped as a surface parking under the QVHSP Project. The Project site contains no agricultural or forest resources, so there is no potential for any significant impacts from the Project relative to agricultural or forest resources. Therefore, these issues would not be evaluated further in this Program EIR. Components of the Project, including construction and operation, would be limited to the Project site, thus, no impact would occur.

7.1.2 MINERAL RESOURCES

- **Loss of Availability of a Known, Valuable Mineral Resource or a Locally Important Mineral Resource Recovery Site:** According to the CGS mapping website, the Project site, is located within a Mineral Resource Zone 2 (MRZ-2), as classified by the State Mining and Geology Board (CGS 2015). MRZ-2 is classified as an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. However, the entire City, including the Project site, is developed with various urban uses, thus there are no areas within City containing known mineral resources appropriate for mineral extraction. Therefore, there would be no loss of availability of known mineral resources or of locally important mineral resource recovery sites. As a result, no impacts relating to mineral resource extraction would occur from implementation of the proposed Project.

7.2 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Pursuant to Section 15126.2(a) of the California Environmental Quality Act (CEQA) Guidelines, this Program Environmental Impact Report (EIR) must identify and focus on the significant environmental effects of the proposed Project. The Project's potentially significant environmental impacts are summarized below and discussed in detail in Section 4.0 of this Program EIR. Although following mitigation, there would be no significant effects from the Project, the analyses in Sections 4.1 through 4.15 indicate the Project would result in significant environmental effects prior to mitigation for the following topical issues: aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, public services and recreation, transportation and traffic, tribal cultural resources, and utilities and services systems.

7.2.1 AESTHETICS

- **Visual Character.** The proposed Project would be compatible with the surrounding use and not visually intrusive; the mass and scale of the proposed structures would be generally consistent with existing buildings on the Queen of the Valley Hospital campus. Implementation of Mitigation Measure AES-1 would require that staging areas be located as far from as possible from residential uses during construction. Changes in the visual character of the site (as seen by the public such as pedestrians and motorists traveling along adjacent roadways) would occur with implementation of development allowed by the Specific Plan. However, development of the proposed buildings and the associated

uses in compliance with the development standards and design guidelines of the Specific Plan and with implementation of Mitigation Measure AES-2, would create a visually cohesive community that would not substantially degrade the existing visual character or quality of the site and its surroundings. Impacts would be less than significant.

- **Light and Glare.** New sources of light and glare would be introduced with the proposed Project; however, adherence to the development standards and design guidelines (architectural and landscape) outlined in the Specific Plan would ensure that potential impacts related to light and glare would be less than significant. Potentially construction-related lighting impacts would be reduced to a less than significant level with incorporation of Mitigation Measure AES-.

7.2.2 AIR QUALITY

- **Construction Air Quality Emissions.** Project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants except for VOC and NOx emissions. VOC emissions during the Long-Range Improvements would exceed thresholds in 2029, and therefore, implementation of Mitigation Measure AIR-1 is proposed to reduce impacts to less than significant by requiring the use of paints that have a VOC content of 10 grams/Liter (g/L) or less for all architectural coating activities during the Long-Range Improvements Phase. To reduce NOx without reducing the quantity or operating hours of construction equipment, which would extend the duration of the construction activities, equipment with newer, low-emission engines should be used. Mitigation Measure AIR-2 requires the use of construction equipment with Tier 3 diesel engines. Project emissions generated during construction would be mitigated by the use of Tier 3 Final-compliant construction equipment and paints with a VOC content of 10 g/L or less during the Long-Range Improvements Phase. All Project-related emissions would be below the regional significance thresholds with the implementation of Mitigation Measures AIR-1 and AIR-2. As such, regional impacts associated with Project-related construction emissions would be less than significant with mitigation. Combined construction and operations emissions would not exceed the operational emissions thresholds established by the SCAQMD. Thus, regional and local construction emissions would be less than significant with the incorporation of Mitigation Measures AIR-1 and AIR-2.
- **Toxic Air Contaminant Emissions.** Emergency generators may emit Toxic Air Contaminants (TACs) during testing and operation. Implementation of AIR-3, which requires that prior to the start of any construction activities, proposed building plans will demonstrate that any standby emergency generator in that phase is powered by natural gas, would reduce potential impacts from onsite TACs to less than significant levels.

7.2.3 BIOLOGICAL RESOURCES

- **Migratory Birds and Nesting Raptors.** Trees and large shrubs on the Project site and in the surrounding area may contain or have the potential to provide suitable nesting opportunities for avian species. In addition, the many trees in the area have a potential to provide suitable nesting opportunities for a variety of raptor species. It should be noted that, under the QVHSP, hundreds of new trees would be planted on the Hospital property during construction of the various Project-related improvements, and these trees would eventually provide additional nesting and roosting opportunities for migratory birds and raptors as they mature. Compliance with the MBTA and Sections 3503, 3503.5, 3511 and 3513 of the California Fish and Game Code, as outlined in Mitigation Measures BIO-1 and

BIO-2, would ensure that potential impacts to nesting birds and raptors are less than significant.

7.2.4 CULTURAL RESOURCES

- **Archaeological Resources.** As indicated by the City's General Plan EIR, there are no known archaeological sites located within the Project area or in the immediately surrounding area. According to available information, the potential for Project-related grading to have significant impacts on archaeological resources is considered low; however, there is a possibility that unknown archaeological artifacts or resources may be encountered during grading. This is a potentially significant impact that requires mitigation, consistent with PlanWC Policy 7.7 and Action 7.7. Implementation of Mitigation Measures CUL-1 through CUL-3 would reduce this impact to a less than significant level, consistent with PlanWC's policies and actions.
- **Paleontological Resources.** According to the PlanWC's Resource Conservation Element, soils and geologic formations within the City, including the Project area, have a low potential to contain significant paleontological resources. In addition, no fossil localities have been previously recorded within one mile of the Project site. Paleontological resources are not anticipated to be discovered during excavation in younger (Holocene) alluvial fan deposits. However, it is possible that grading in older alluvial materials (i.e., Quaternary) could impact previously undiscovered paleontological resources. Thus, the proposed Project has the potential to significantly impact unknown paleontological resources, but implementation of Mitigation Measure CUL-4 would reduce this potential impact to a less than significant level, consistent with the City's General Plan policies and actions.
- **Human Remains.** If human remains are found, state law requires proper treatment for the remain in accordance with applicable regulations. Sections 7050.5–7055 of the California Health and Safety Code describe the general provisions for dealing with human remains. Specifically, Section 7050.5 of the California Health and Safety Code describes the protocols to be followed in the event that human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented. Although there is no indication that human remains are present within the Project area, Project-related grading has the potential to unearth previously undiscovered human remains. If Project-related grading exposes buried human remains, implementation of Mitigation Measure CUL-5 and compliance with existing regulations would ensure that impacts in this regard are reduced to a less than significant level.

7.2.5 GEOLGY AND SOILS

- **Seismic Ground Shaking.** The possibility of ground acceleration or shaking on any part of the campus, including any areas to be developed in the future under the proposed QVHSP, is similar to that for all of Southern California and is considered a potentially significant impact that requires mitigation. Implementation of MM GEO-1 requires preparation of a site-specific Geotechnical Report to determine appropriate site and building designs, which would reduce potential impacts related to soil and geologic constraints to less than significant levels. In addition, the proposed Project would comply with applicable local and State regulatory requirements. Compliance with applicable regulatory requirements, and incorporation of site-specific geotechnical recommendations into the design and construction of the Project would ensure that people and/or structures

would not be exposed to potential substantial adverse effects from strong seismic groundshaking.

- **Soil Erosion or the Loss of Topsoil.** Ground disturbance during grading and construction could lead to erosion and loss of topsoil during wind or rain events, resulting in a potentially significant impact. Development projects that disturb one acre or more of land are required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Compliance with the NPDES Construction General Permit, Mitigation Measure HYD-1 and City of West Covina grading requirements, as outlined in Mitigation Measure GEO-2, would reduce erosion and sedimentation during construction and long-term operations. Therefore, Project-related storm water quality impacts resulting from erosion during construction and long-term operations would be less than significant after mitigation.

7.2.6 HAZARDS AND HAZARDOUS MATERIALS

- **Release of Hazardous Materials.** Available information indicates the potential for accidental release of hazardous materials during grading is low. In addition, due to the age of construction of some of the onsite hospital buildings, it is possible that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) may be present. If present, these materials would need to be remediated prior to demolition of any buildings or before substantial remodeling of any existing buildings. With implementation of Mitigation Measures HAZ-1 and HAZ-2, the proposed Project would have a less than significant impact associated with the accidental release of hazardous materials that would represent a significant impact on the environment or a significant risk to public health or safety,
- **Hazardous Materials within One-Quarter-Mile of an Existing or Proposed School.** Edgewood Middle School and Edgewood High School are located 0.05 mile southwest of the Project site just across Merced Avenue. However, the hospital building is over 0.20 mile from the closest classroom or administration building of the schools. Hospital facilities staff have indicated they are not aware of any recent or historical incidents in the buildings or on the grounds of the hospital involving hazardous materials. With implementation of Mitigation Measure HAZ-3, the potential impacts on local schools from construction and operation of the proposed Project would be reduced to less than significant levels.

7.2.7 HYDROLOGY AND WATER QUALITY

- **Water Quality Standards and Waste Discharge Requirements.** Compliance with the requirements of the NPDES Construction General Permit, including preparation of an SWPPP as outlined in Mitigation Measure HYD-1, would ensure impacts from the proposed Project to receiving waters from storm water and non-storm water discharges during construction would be reduced to less than significant levels. Implementation of onsite BMPs would remove pollutants in the storm water from the site and prevent contributions to water pollution to Walnut Creek Wash and ultimately to the San Gabriel River. Compliance with Mitigation Measures HYD-1 and HYD-2 would prevent violations of water quality standards and the degradation of storm water quality. Both short- and long-term potential water quality-related impacts would be reduced to less than significant levels with implementation of these measures.
- **Impacts to Onsite Drainage Patterns and Storm Drainage Systems.** The Project site is fully improved with impervious surfaces except for the former Sunset Field (park) site in the northeast corner of the property. Development of this area would eventually cover over the area with impervious surfaces, which may incrementally increase onsite runoff. It

would be the responsibility of the engineers working on Project-related improvements to assure that onsite runoff does not exceed current levels or does not exceed the capacity of downstream flood control or storm runoff facilities. Further, implementation of Mitigation Measure HYD-3, would reduce potential changes in drainage patterns on site that could lead to erosion, siltation, or flooding at downstream facilities, to less than significant levels.

7.2.8 LAND USE

- **Conflict with Applicable Land Use Plan, Policy, or Regulation.** With approval of the General Plan Amendment, Zone Change, and Specific Plan, the proposed Project would be consistent with short- and long-range goals, policies, and actions outlined in PlanWC and would be consistent with regional planning goals developed by the Southern California Association of Governments (SCAG). The design of the Project would also be made compatible with surrounding land uses to the extent feasible. With implementation of Mitigation Measure LUP-1, potential land use or planning impacts of the Project would be less than significant.

7.2.9 PUBLIC SERVICES AND RECREATION

- **Fire Protection.** No new, expanded, or altered fire protection services or facilities would be required to provide fire protection services in the future. Therefore, no physical impacts associated with new or altered fire protection facilities would occur as a result of the proposed Project. Implementation of Mitigation Measures PS-1 and PS-2 would help assure that impacts related to fire protection services would be reduced to less than significant levels.
- **Police Protection.** The proposed Project would comply with all applicable codes, ordinances, and requirements related to safety in addition to payment of DIFs. The Project would not require new or physically altered WCPD facilities that would cause significant environmental impacts. With implementation of Mitigation Measures PS-1 and PS-3, impacts related to police protection services would be less than significant.
- **Schools.** It is not anticipated that schools within the vicinity of the Project site would be impacted by increased demand from the proposed Project. Further, similar to other developments in the area, the proposed Project would be required to pay all applicable school impact fees (Mitigation Measure PS-4). With implementation of Mitigation Measure PS-4, the proposed Project would not result in construction of new or physically altered school facilities, no physical impacts to schools would occur, and this impact would be reduced to less than significant level.

7.2.10 TRANSPORTATION/TRAFFIC

- **Construction and Operation Traffic Impacts, Parking, and General Plan Consistency.** With implementation of Mitigation Measures TRA-1 through TRA-9, the proposed Project would have less than significant impacts during all phases of construction and operation, pertaining to parking and General Plan consistency. However, there would be a significant adverse and unavoidable impact under buildout conditions (2035) at Merced Avenue/ Sunset Avenue (ROW constraints) due to lack of feasible mitigation.

This analysis also determined that the following intersections had significant impacts under the Existing Plus Project scenario: (1) Merced Avenue/Sunset Avenue (ROW constraints); (2) Cameron Avenue/Sunset Avenue (PM Peak); and (3) West Covina

Parkway/Sunset Avenue (PM Peak). However, the Existing Plus Project analysis represent a theoretical condition and is not an actual building scenario, therefore it does not require mitigation.

7.2.11 TRIBAL CULTURAL RESOURCES

- **Unknown Tribal Cultural Resources.** The proposed Project has a potential to impact unknown tribal cultural resources but implementation of Mitigation Measures CUL-1 through CUL-5 and TCR-1 through TCR-2 would reduce this impact to a less than significant level, consistent with PlanWC policies and actions.

7.2.12 UTILITIES AND SERVICE SYSTEMS

- **Water and Water Treatment Facilities.** Development allowed by the proposed QVHSP would require the construction of new water, recycled water, and sewer lines on site. However, no off-site improvements would be needed. Construction of infrastructure improvements within and immediately adjacent to the Project area would result in short-term impacts related to air quality and traffic. These impacts are addressed in Section 4.2, *Air Quality* and Section 4.13, *Transportation/Traffic*. No additional impacts related to construction and operation of utility systems would occur.
- **Solid Waste Federal, State, and Local Statutes and Regulations.** Implementation of the QVHSP would comply with ongoing waste management programs/requirements implemented by the City. Construction contractors would also be required to comply with existing regulations for reducing solid wastes from construction and operation associated with implementation of the proposed Project. Development of the Project would be in compliance with applicable statutes and regulations and through implementation of Mitigation Measures UTL-1 through UTL-5. Thus, impacts would be less than significant

7.3 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE MITIGATED

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this Program EIR also considers the significant environmental effects, which cannot be avoided if the Project is implemented. Implementation of the proposed Project would result in potentially significant and unavoidable impacts associated with Greenhouse Gas Emission (GHG) and Transportation/Traffic, as follows:

7.3.1 GREENHOUSE GAS EMISSIONS

- **Project Generated Greenhouse Gas Emissions.** The Project would generate GHG emissions, either directly or indirectly, that would exceed the Tier 3 and Tier 4 interim thresholds and would potentially have a significant impact on the environment related to the magnitude and GHG efficiency thresholds. These exceedances are primarily the result of the size of the Project and the associated transportation-related emissions, which cannot be feasibly reduced as the Project has little or no control over vehicular trips to and from the hospital by the patients and visitors. The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, due to the exceedances of the SCAQMD's significance Tier 3 and Tier 4 thresholds, even with the implementation of Mitigation Measure GHG-1, this impact would remain significant and unavoidable, and a Statement of Overriding Significance would be required.

7.3.2 TRANSPORTATION/TRAFFIC

- **Local Intersection Traffic Impacts.** Even after implementing Mitigation Measure TRA-1, there would still be significant adverse traffic impacts at the following intersections: Merced Avenue/Sunset Avenue (ROW constraints); Cameron Avenue/Sunset Avenue (PM Peak); and West Covina Parkway/Sunset Avenue (PM Peak) under the Existing Plus Project scenario, as shown in Table 4.13-6. Existing Plus Project Impacts (2018) – Local Intersections – With Mitigation. These impacts would require adoption of a Statement of Overriding Considerations.

7.4 REFERENCES

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SECTION 8.0

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Alia Hokuki QA/QC Reviewer
Aimee Frappied Assistant Project Manager
Alejandro Angel Traffic Group Manager
Darlene Danehy Traffic Engineer/Lead
Tin Cheung Director, Air Quality & Acoustical Programs
Daria Sarraf Environmental Analyst
Charles Cisneros Senior Archaeologist
Kassie Sugimoto Archaeologist
Bob Talafus Director, Engineering Group/Lead
Jaylee Williamson Engineering Assistant
Melissa Macias Paleontologist
Sheryl Kristal Word Processor
Michael Deseo GIS Technician/Graphics

8.2 SPECIFIC PLAN PREPARERS

8.2.1 KTG Y

John Moreland Project Manager
Jason Gavin Assistant Project Manager
Lora Kennedy QA/QC Project Assistant

8.2.2 H R & A (FISCAL IMPACT ASSESSMENT)

Amitabh Barthakur Principal
Jane Carlson Project Manager

8.3 PROJECT APPLICANT

8.3.1 QUEEN OF THE VALLEY HOSPITAL

Charles “Chip” Riddle..... Chief, Hospital Support Services
Tony Blakely Facilities Director, Design and Construction

8.3.2 CUNNINGHAM GROUP (ARCHITECTURE)

Wayne Hunter Architectural Principal
Kevin McQuaid..... Project Architect

8.4 ORGANIZATIONS AND PERSONS CONSULTED

8.4.1 STATE AGENCIES

Scott Morgan..... Director, Office of Planning and Research
Charles Chu Sergeant, California Highway Patrol
Dave Kereazis..... Permitting Division - CEQA, Department of Toxic Substances Control
Pete Cooke .. Site Mitigation and Restoration Program, Department of Toxic Substances Control

8.4.2 REGIONAL AND LOCAL AGENCIES

Alyson Stewart..... Senior Regional Planner, Los Angeles County
Lijin Sun Program Supervisor, South Coast Air Quality Management District
Ping Chang Acting Manager, Southern California Association of Governments
Adriana Raza Customer Service Specialist, County Sanitation District of Los Angeles County
Bruce Durbin Supervising Regional Planner, Airport Land Use Commission

8.4.3 NATIVE AMERICAN TRIBES

Charles Alvarez..... Gabrielino/Tongva Tribe
Sandonne Guad..... Gabrielino/Tongva Nation
Anthony Morales Gabrielino/Tongva San Gabriel Band of Mission Indians
Andrew Salas/Brandy Salas Gabrielino /Tongva Band of Mission Indians/Kizh Nation
Raudel Banuelos, Jr..... Barbaeno/Ventureno Band of Mission Indian
Lynn Valbuena San Manuel Band of Mission Indians
Joseph Ontiveros Soboba Band of Luiseno Indians
Delia Dominguez..... Kitanemuk & Yowlumne Tejon Indians
Robert Robinson Kern Valley Indian Community
Rudy Ortega, Jr..... Fernandeno Tatviam Band of Mission Indians
Kenneth Kahn Santa Ynez Band of Chumash Indians



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