

Mark and Susan Paredes
611 N. Eileen Ave
West Covina, Ca 91791

M&SP

December 20, 2020

Sent via e-mail

Ms. Jo-Anne Burns, Planning Manager

City of West Covina

1444 West Garvey Ave. South, 2nd Floor, Room 208

West Covina, California 91790

JBurnswestcovina.org

Dear Ms. Burns

We Are re-issuing our letters from August of 2020 with regards to our concerns with the Walnut Grove Residential Project.

We moved here in 1986 because our house sits in a cul-de-sac which provided a safe environment to raise our family. We hope to continue living as we have in the safe and friendly community. That we have worked hard to preserve the life we have led.

1

Please review what was already presented and agreed upon. We are in communication with Michael and Patricia Dobszewicz at 600 Eileen Ave. and those in the neighborhood. We are in agreement with their concerns and also look to resolve these issues.

Respectfully submitted

Mark and Susan Paredes

Documents attached to email

Pioneer Housing Project Lewis Land Developers. LLC

Adam Collier Project Manager

626-641-5855

adam.collier@lewismc.com

I talked over the phone to Adam Collier on Aug. 6, 2020. These are the concerns that we went over.

The cul-de-sac is ours, the whole circle. My understanding is that when the school was built the property line was just pass the circle. LLC is giving it to the City of West Covina, the circle part of the cul-de-sac. Which is good for us.

2

The whole drainage system is going to be re- done and will run thru LLC property. So those homes at the end of our cul-de-sac on Eileen will not have to worry about back up water and overflows.

3

Each new unit will have high windows on the sides that face existing home. So, we will have our privacy. The unit themselves will be 25 feet high. There will be hedges that will be planted in an 8ft wide planter. The hedges going in will be about 15ft high and will grow to about 20ft. They will be planted 4ft away from the wall and or existing homes. They will be maintained by the property maintenance services.

4

Also, the old fence around the existing homes will be taken down. LLC at their expense want to put up their own wall. This way they will not have a wall in front of an existing wall. Which would create a dead space. Aug 15' 2020. this will be discussed with the homeowners that are affected by this. It would be a 6ft high wall. They would (LLC) need your permission to take your wall down and they would build the new one. I do not know all that is involved with this, just what I was told. Which for their new homeowners, they would see one continuous wall all the way around the complex. This is the wall that will be 4 ft from the hedges that they will be planting.

5

These new units are not apartments and are not for rent. They are Townhouse and will be sold. Two car garages have been built for the units ...but I cannot remember if they are under the units or not. They also have parking for visitors.

6

We talked about the three-story homes, they will be on the east side of the property next to the commercial area. So, they will not be looking over or into any of our homes or yards. 7

We talked about the 158 units and the impact of having that many cars coming and going during the morning and the evening commutes. The numbers are in the papers that I put together for LLC of what we are concerned about. You can see the impact there. I put out a number of 100 units, but told Mr. Collier that is just a number that you can see what a difference that would be. That also is in the report that I sent him. 8

He told me this still has to go thru the City of West Covina. We will keep in touch on updates. Remembering to not to exaggerate and always be honest with each other. 9

Susan Paredes

626-339-2267

1 Our cul-de-sac? WE WANT THE CUL-DE-SAC. That includes the whole circle. We have been told by everyone that YES you still have your cul-de-sac from : CVUSD, DJP Engineering, and West Covina Planning Division.

It is especially important to us and others that use this cul-de-sac. Our children play there with parent supervision and the older ones feel safe enough to play there with out having to worry about cars coming down the street. Our children learned to ride their bikes and skate there even learned to skateboard. Many have played a game of baseball there and have hitting practice. Our children even learned to fly their kites here.

10

The trucks deliveries such as Amazon, FedEx, UPS, and especially Athens utilize the cul-de-sac by not having to back down the street. Otherwise such vehicles could endanger our children for they may not be seen by the drivers. Homeowners vehicles are also in danger of vehicles of getting hit or scratched by service trucks. Without the full cul-de-sac, it becomes a safety issue. The cul-de-sac also gives homeowners extra parking for get togethers.

2. What kind of fencing or wall will be there?

Is the old fencing staying? The one that runs along the existing homes.

How high will that wall be and how far from the existing homes there now? Will it be high enough to give our neighbors along that stretch their privacy?

Also, how far from the existing homes is a concern to us. For what ever the distance. (We would like to know the number) be it 30 feet or 60 feet.

11

From the existing homes now to a new wall for the new homes there will be a dead space. Will the Dead space be taken care of by the new property maintenance services? For we do not want any more trouble with rodents, bugs and coyotes, skunks, and opossums. Also, the overgrown vegetation that comes with dead space. Many times, it gets overlooked as it has in our past years here.

I am sure you know about the water run off from Big Lots and Food for Less, when it rains, that goes through the gutters at the back of this property, which runs along the existing homes here and empties out onto Rowland Ave. If they are not maintained by the property maintenance,

12

there could be problems. Overgrowth, even trees growing in the gutters and rodents and other animals will live there and cause a major back up to all of us on both streets, Eileen and Pioneer.

12
(cont.)

- 3 Are these new homes going to be apartments or are they going to be single family homes? Are they being sold to the individual person or are you renting them out? A town house is just another word for apartments. By the looks of the chart we have there seems to be in some of the pictures that there are four adjoining homes and even in some 5? There was no chart sent with these pictures of what all the numbers stood for. So we could wrong on the numbers of homes in one unit. But we would like to know.
-

13

Also, NO WINDOWS facing to the existing homes now. We want our privacy. It is why most of us moved in a cul-de-sac. That would be for both streets, Eileen and Pioneer. In some of the other units that will be 3 stories high, we would that same consideration. NO WINDOWS on the sides where they can look into our yards. Being very honest here, in todays world, we as parents must take every precaution, we can to keep our families and ourselves and our neighbors safe. Also, we should be able to live here and feel safe and be able to be happy with our surroundings.

14

We would like Less units. 158 units...Most of these probably will have at least 2 adults living in them. Who will have their own cars? 158 units' times 2 adults come to 316 people. 316 people times 2 cars come to 632 cars. That will be going to work each morning and coming home each evening on Rowland Ave. That is a lot of traffic. Also that is the MAIN reason we on Eileen and Pioneer want to keep our cul-de-sacs. That is way too much traffic that would be coming down our streets. If these families have older children or a friend that lives with them and are at the age that they can drive, that is going to add to more cars and more traffic. That number of 632 cars could go up to 50, 70 or even 100 more cars. Which could be 700 cars.

Are these units being built with underground parking?
Or are these units being built with the ground floor being their parking garage? How many parking spots will there be?

15

We would like to see less units. More like 100 units. Imagine the space you could give to those that will be living in these new homes. If we ever are locked down again, they would have enough room in their homes to move around and not be in each other ways. It would give more room for the existing homes to have more privacy for themselves and their families. It would be nice like our homes are, a place that we are not cramped or on top of others. Or so close that we can hear everything going on in others home. You want this to be inviting to the people that will be living there. Most of them hopefully will have children that will go to our schools. That is what we were told from the start of all the meetings that we have had with the board at CUSD. This is for the schools and the children. To bring more young families in to keep our schools open.

16

We are not stupid; these new buildings are to make money for the builders and the city of West Covina. We know that we understand that. But do not take advantage of the people that have been here. Be it 5 years or 35 years. We pay our taxes and take of each other and our streets. Please take in consideration our wants, our needs our peace of living in a secure city and street.

17

Have you ever walked down to the cul-de-sac, just to see a full Harvest Moon? Or a total eclipse of the Moon? Because that cul-de-sac is the clearest spot on Eileen Ave to enjoy so many gifts of nature and most importantly from God.

18

Pioneer Housing Project and or Walnut Grove Project

Aug. 11. 2020

Mr. Collier, these are some of the concerns that were told to me as I passed out the Project Fact Sheets that you gave to me on Monday Aug, 10, 2020. I will list them for you. But I also told them to call you with their concerns in case I forget some things that they said to me. 19

It was brought to my attention on the Fact Sheet that we do not have a KMART. That is fact #5. I figured it was just a mistake. But when this is business, we have to be careful what goes out to the public. For we see it as, this is the same fact sheet that goes out to all their sites. 20

Another word that caught my attention is the word "proposed" in Fact #1 and Fact #2. Does this indicate these plans are still open for discussion? You did say, "YES" the cul-de-sacs will remain as they are. Does the word "proposed" suggest vehicles MAY still go thru the cul-de-sacs and neighborhood? In my travels yesterday there was absolute consensus that this not be allowed! This needs to be cleared up. For if not, I am telling them all the wrong information. Amazing what one WORD can CHANGE and SAY. 21

On Fact #2 regarding the block wall, again that word, proposed. That needs to be clear for all that are also reading these facts. Will the discussion be between Lewis and the neighbors involved, and/or with the City of West Covina? 22

On Aug. 6, 2020 you stated that Lewis will pay for the new walls. As I talked to our neighbors they were concerned, because this is not stated on the Fact Sheet. You may want to add this. Regarding the fumigation. I did ask you about the buildings being fumigated before they are knocked down. You agreed with me on that, Right? A lady asked me about that, I told her what you and I discussed. But she wanted to know would there be some sort pest control During the building and after all the homes were finished. I told her to call you because I could not remember exactly what we said. I did remember that you said something about pest control, but I wasn't sure if it was for after when all the homes were built. Or also for while building was going on? 23

Another concern, I told the family to call you for I do not know the law on the height of the walls. I told them I knew that I (think) the law is for 6 ft, But I couldn't tell them why only 6ft. They want the wall higher, not sure how high and they were not exact on the height either, but did mentioned 7 ft. They did not want to look into the property at all and vice a versa. I explained about the hedges, it was a good thing...but they were still concerned about the height. I am sure they will call you. 24

I did my best to explain what I was told by you. Even though some of these concerns may be minor.. to the families involved they are not. This includes me also, with businesses WE just do not know what goes on the business meetings and we have to stand up or fight for what we think is right for our neighborhood.

25

We have not been treated right by Covina Unified or the City of West Covina. So you can understand concerns and how we feel about facts that are not there or words that can mean something else.

Susan Paredes

Mark and Susan Paredes

Comment Letter Dated December 20, 2020

M&SP-1 The comment regarding reissuing the letters from August 2020 is noted and will be forwarded to the decision makers. The commenter expresses their living environment and indicates that their neighbors also have concerns, and they all hope to resolve the issues. Comment is noted, no further response is required.

M&SP-2 The commenter notes that she talked to Mr. Adam Collier on August 6, 2020 regarding a series of concerns. The first comment identifies concerns for the cul-de-sac and states that the whole circle belongs to the neighborhood. The comment is noted and will be forwarded to the decision makers.

It should be recognized that the Applicant will modify the cul-de-sac at the south of North Eileen Street to improve drainage, but it will remain essentially in its current configuration. The cul-de-sac will not be removed or incorporated into the new community. A solid perimeter wall will be installed around the cul-de-sac to discourage access and parking for new residents and guests. A solid perimeter wall will be installed around the cul-de-sac to discourage access and parking for new residents and guests. There will be a gated access point restricted to emergency vehicles only.

M&SP-3 The comment regarding the drainage system to be redone is noted and will be forwarded to the decision makers. The channel that extends across the northwest and western boundary of the site currently accepts offsite drainage from the commercial center north of the Project. With implementation of the proposed Project, the current flows from offsite will be intercepted at the northern cul-de-sac (North Eileen Street) and re-routed through the Project site through an underground drainage system. Following completion of the drainage improvements at the North Eileen Street cul-de-sac, the road will be repaired to resurface damaged areas associated with the construction effort.

M&SP-4 The comment regarding the windows facing existing homes and retaining the privacy of neighbors is noted and will be forwarded to the decision makers. The windows on the second story units along the north side of the property have been modified to a height that will make it impractical for the future residents in those units to have downward visibility into the existing adjacent properties. As such the privacy of existing homes are respected and protected.

Regarding the landscaping, the designated 7.5-foot tall landscape buffer is intended to be planted with Podocarpus Gracilior (or similar) and maintained on a regular basis. The purpose of the buffer is to provide additional privacy. The landscape buffer will not be a maintenance obligation of the individual unit owner. To keep the landscape buffer uniform, the plant material will be maintained by the homeowners association for the Project and will be kept at a manageable height that will not impact roof-mounted solar panels for the homes that have solar panels.

M&SP-5 The comment regarding replacing the old fence with a new wall is noted and will be forwarded to the decision makers. The comment indicates that the Applicant will build a wall so a dead space would not result between the old fence and the new block wall. The Applicant is currently working with some homeowners on replacing

the existing fence/wall, where appropriate. In some cases, the existing wall of the homeowner will remain in place. In other cases, the existing fence/wall will be replaced or modified. Every effort will be made to avoid or minimize a double wall condition; however, it will require cooperation from the adjacent owners.

- M&SP-6 The comment describes the types of units and parking that will be developed as part of the Project, and that the townhouses will be for-sale units. Just to supplement the description, the Project would involve construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. the Project would include 2 covered garage parking spaces per dwelling unit (for a total of 316 indoor garage spaces) and 99 uncovered guest surface parking spaces throughout the Project site.
- M&SP-7 The comment regarding the location of the three-story homes within the development is noted. As the commenter indicates the three-story attached units will be located along the eastern portion of the site. Regarding windows overlooking the existing homes, please refer to Response M&SP-4, above.
- M&SP-8 The comment regarding increased traffic associated with the 158 units is noted. Section 4.17, Transportation, of the IS/MND includes a detailed analysis of the potential traffic impacts of the proposed Project. While it is acknowledged that the Project would generate trips and increase traffic, construction traffic is not likely to create any significant impact due to the size of the proposed Project. Additionally, during Project operations, as indicated in Section 4.17, the proposed Project's daily trip generation of 1,124 trips per day, with approximately 82 AM peak hour trips and 106 PM peak hour trips is unlikely to result in any impacts at roadways and intersections near the site and in the surrounding area. The number of vehicles being added will be a relatively small percentage of the existing traffic in the area. As such, the analysis does not identify any mitigation measures, as none is required.
- M&SP-9 The comment regarding the Project being processed through the City of West Covina and staying in touch with update is noted and will be forwarded to the decision makers. No further response is required.
- M&SP-10 The commenter expresses the importance of the cul-de-sac to them and the community. The comment is noted. Please refer to Response M&SP-2, above, for more detail on the cul-de-sac.
- M&SP-11 The comment expresses concern regarding the proposed wall and inquires about the height of the wall and distance from the existing homes. The comment further asks about a potential dead space that could result and issues associated with critters and the maintenance of such space. Please also refer to Response M&SP-5, above for additional discussion.
- M&SP-12 The commenter questions the water runoff from neighboring commercial properties that ultimately empties out onto Rowland Avenue. Please refer to Response M&SP-3, above, regarding this issue.

The comment regarding maintenance of the gutters is noted and will be forwarded to the decision makers. This comment is beyond the scope of the proposed Project. No further response is required. However, it should be noted that the existing runoff from the neighboring commercial property to the north of the proposed Project

currently drains into a catch basin, which ultimately outlets above ground into a channel and swale along the north and west edge of the Project site. The proposed Project will intercept the runoff at the North Eileen Street cul-de-sac and transfer the flow through the site where it will be managed through the storm drain system.

- M&SP-13 The commenter questions the types of units proposed. The comment is noted. Information regarding the units and their numbers is detailed in Section 3.0, Project Description, of the IS/MND. For a summary of number and type of units proposed, please refer to Response M&SP-6, above.
- M&SP-14 The comment expresses concern regarding potential invasion of the privacy of existing homes. Comment is noted and will be forwarded to the decision makers. For a discussion of this issue, please refer to Response M&SP-4, above.
- M&SP-15 The comment regarding less units and the issues of parking and traffic associated with the proposed 158-unit development is noted and will be forwarded to the decision makers. The commenter makes an assumption that each unit will have two adults with each adult owning a car. Based on this assumption, the commenter erroneously states that there will be a total of 632 cars, while based on the stated assumption there will be a total of 316 cars. However, it should be recognized that the increase in traffic is not quantified based the number of cars in each household but rather based on the type of development that is proposed, in this case single- and multi-family residential. Thus, traffic trips commensurate with the type of residential development. The single-family detached units would generate 9.44 daily trips per day, and the multi-family units would generate 5.44 daily trips per unit. These generation rates have been derived from the Institute of Transportation Engineers' (ITE's) *Trip Generation Manual*, 10th Edition, as discussed in Section 4.17, Transportation, of the IS/MND. Using these rates, the proposed Project's daily trip generation is calculated. For a discussion of Project related traffic, please refer to Response M&SP-8, above.

Regarding parking, the Project would include 2 covered garage parking spaces per dwelling unit (for a total of 316 indoor garage spaces) and 99 uncovered guest surface parking spaces throughout the Project site. As indicated in Section 3.2, Project Access/Parking, of the IS/MND, in accordance with the provisions of the Walnut Grove Specific Plan, while the proposed Project is required to provide a total of 316 parking spaces for residents and 79 spaces for guests, the Project would exceed this requirement by providing 20 surplus guest parking spaces. No underground parking is proposed.

- M&SP-16 The comment expresses the benefits of less units, so the future residents will have more "space" in their homes. The comment is noted, but it is speculative, as it makes assumptions about the future resident's interests and preferences. The commenter also hopes that the future residents will have school age children who would enroll in the schools in the area to keep them open. The comment is noted. No further response is required.
- M&SP-17 The commenter asks for consideration for their needs and wants and indicates that they do not want to be taken advantage of. The comment is noted and will be forwarded to the decision makers. No further response is required.

- M&SP-18 The comment regarding the cul-de-sac being the clearest spot on Eileen Avenue to enjoy the nature is noted and will be forwarded to the decision makers. Please refer to Response M&SP-10, regarding the cul-de-sac. No further response is required.
- M&SP-19 The comment addresses Mr. Collier and indicates that the commenter passed out the Project Fact Sheets. The comment is noted, and no further response is required.
- M&SP-20 The comment regarding the Fact Sheet as related to KMART is noted and will be forwarded to the decision makers. No further response is required.
- M&SP-21 The comment regarding the word “proposed” is noted. It should be recognized that use of the word “proposed” during the planning phase of a project is customary and standard. Until a project is approved, it is referred to as the “proposed” project, and its components (e.g., units, parking, wall, etc.) are also referred to as “proposed units”, “proposed parking”, “proposed wall”, etc.
- M&SP-22 Regarding the use of the word “proposed”, please refer to Response M&SP-22, above. The discussion regarding the block wall has been between the Applicant and the neighbors. The wall will be reviewed and approved by the City of West Covina. The cost for permitting and construction of the wall will be borne by the Applicant.
- M&SP-23 The comment regarding fumigation of existing structures and use of pest control upon completion of the units is noted and will be forwarded to the decision makers. Pest management will be included as part of the demolition of the existing school structures.
- M&SP-24 The comment inquires about the height of the wall as it relates to privacy. The perimeter wall will generally range from 6 to 8 feet in height. There may be some exceptions in cases where the existing wall of the adjacent property owner will remain. In an effort to further enhance privacy, a 7.5-foot perimeter landscape buffer adjacent to the wall will be established as part of the proposed project. A hedgerow of closely spaced shrubs will be planted to form an additional privacy barrier. The landscape buffer will be maintained by the homeowners association for the proposed Project to ensure regular care and uniformity.
- M&SP-25 The commenter indicates that she provided information about the Project to the neighbors as much as she could remember and emphasizes the importance of their concerns. The commenter further states that they have not been treated right in the past. The comment is noted and will be forwarded to the decision makers. No further response is required.

Lydia K. Frey

1615 E Rowland Ave
West Covina, CA 91791
626.627.1121
lfrey@student.mtsac.edu

19th February 2020

Joanne Burns

Planning Department, West Covina
1444 W Garvey Ave S # 208
West Covina, CA 91790

Dear Ms. Burns,

I am writing to express my concerns regarding the development planned for the Walnut Grove residential project on Rowland Avenue in West Covina (the City) by Lewis Group of Companies. Below are my concerns:

1. Environmental

- a. The Leighton and Associates, Inc. (Leighton) study detected lead, arsenic, and Organochloride Pesticides, though Leighton states the levels fall below the EPA threshold restrictions for residential land use. However, after their results findings in this Level I study, they recommend further studies. It states:

“In general, observations should be made during future subject site development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and tanks, stained soil or odorous soils. Should such materials be encountered, further investigation and analysis may be necessary at that time.” (10.0 Conclusions)

1

- 1. As a resident within 22 meters, exactly 24 yards away from this project, I agree with the scientists at Leighton and Associates, Inc. (Leighton) and demand further studies.

- b. As mentioned in my Hydrology point, the Lewis Group and the City intends to replace roughly five acres of penetrable land with impenetrable materials. Water run-off from the Walnut Grove site will have significantly more contaminants. With the cars parked in the 355+ spaces provided, contaminants will go directly into the water swale and into the catch basins as recommended by DJO Engineering. What is existing needs to be investigated and repaired before anything new gets installed. The water run-off will go to the West Covina wash and into the ocean, therefore, there is an environmental impact from this project.

2

- c. Nesting Birds - Nesting in two of the trees on the west side of the property on 1651 E Rowland Ave are three birds nests visible to the naked eye in the top two thirds of the trees. As an average lay person, I cannot tell if I tried to determine if these are the only nests existing in the trees on the property, nor can I tell what the species is.

3

| | |
|---|--------------|
| <ul style="list-style-type: none"> i. See appendix item III for reference photos of these nests. ii. I request further studies be conducted to determine protections, if any, should be provided to these nesting birds, their migration patterns, if any, whether or not these birds or any other species nesting or habitating on or in the property, will have their habitat taken away from them, and/or if any of those species rely on this property annually or on a regular schedule for nesting/mating/etc. | 3 (cont.) |
| d. Removal of the nine significant trees, including the five heritage oak trees, does, in fact, have an environmental impact. It is estimated that each tree absorbs about 31 lbs. of carbon dioxide each year, per the nonprofit corporation Saving Nature, Inc. Removing roughly five acres of grass is also detrimental, for a 1,000-square-meters area of grass will take up around one tonne of carbon per year; this proposed project removes roughly 20k square meters. | 4 |
| e. Air Quality: One study on the City website of Projects and Environmental Documents states that the equipment may only temporarily have an impact on the air quality of local residents, however, that is more than any of us asked for. | 5 |
| 2. Public Utilities & Electric | |
| a. There is no study published or list of commenters that submitted written comments on the Draft IS/MND including Southern California Edison (SCE), our local utility for electricity, which has increasingly been feverishly working to combat the occurrence of wildfires due to unforeseen circumstances where they source their power grids. What has the city/Lewis Group of Companies done to let SCE know of the additional 158 three-story dwellings that are going to be added to their power grids during our environmental crises of climate change? | 6 |
| <ul style="list-style-type: none"> i. What is the City going to do for not just the 158 dwellers likely to get a rolling blackout in peak-heat season, but the rest of us in this neighborhood? ii. Additionally, many of these community members within this neighborhood block are elderly. Putting such an additional power grid strain in such a small area will put many of these long standing community members, who happen to be seniors, in harm's way. | |
| 3. Traffic Study Flaws: | |
| a. Highway 39 - Was CalTrans alerted of this project? With the number of units planned, the number of parking spots, 150% for dwellers, assuming most of them will be commuters using their vehicles on Azusa Avenue/SR-39 traveling either northbound or southbound to use I-10 or i-210, that is adding at least 12,000 cars per day based off of the study using data from 2017 projections. | 7 |
| <ul style="list-style-type: none"> i. This data should be revisited. Using traffic studies that old, and prior to the world-changing COVID-19 pandemic lacks foresight. ii. The Northbound left-hand turn pocket is so small (200-foot length pocket) and the Lewis group plans to build 158 three-story homes (with their self-published study predicting a population increase of only three people moving in per unit) and at least 355 parking spaces, with only one entrance and exit only on Rowland Avenue. iii. Additionally, the southbound right-hand turn pocket on SR - 39 is shared with a bus stop. iv. This added traffic increases the probability of accidents because people will try to avoid the bus when turning right and people will be trying to catch that left-hand turn light. | 8 |

| | |
|---|--------------|
| v. Given that these are 3 story residential units, and that two of the schools the children residing in these homes will be assigned to are across SR-39 from the proposed project, there is also added risk of potential pedestrian strike on a state-owned highway here. | 8 (cont.) |
| b. Potential for Accidents on Rowland Ave:8 | |
| c. Currently, CALTRANS recommends in their comments traffic calming measures. There are absolutely no traffic calming measures on Rowland from Grand Ave to Sunset Ave. The only entrance and exit to this proposed development are on Rowland. With the predicted 108 peak a.m./p.m. traffic trips, it is fair to assume that many of them will want to head to I-10. I-10 takes you to the Los Angeles area and to the Ontario/Riverside area, and more. This one exit from this development will cause congestion at the Rowland Ave/Homerest Ave intersection with about 100 cars hoping to make a U-turn to get onto Azusa Ave to get onto I-10. Or, perhaps making a left onto Homerest Ave and driving through that neighborhood block and then turning left on Workman Ave, then right on Azusa Ave/SR-39. The speed limit on E Rowland Ave between Azusa Ave and Lark Ellen Ave, between three schools -- Covina High School, Traweek Middle School, and Rowland Avenue Elementary School -- is 35 MPH. Surely, as a resident, I can hear and feel the vibrations to honestly report that most of the drivers on Rowland do not follow this speed limit. Thus, roughly 108 cars will be trying to exit this complex, causing massive congestion for already-road-raged drivers at peak time, between three schools. The length between the exit driveway of Pioneer school and the U-turn point at Homerest gives exiters 513 feet of length to block drivers. What about those of us who live on Rowland between their exit and that point -- when do we get to jump in and leave? This is completely unsafe. | 9 |
| i. To my point, what is West Covina/Lewis Group of Companies' plans for traffic calming measures? | |
| ii. Between Rowland and Puente, cars drive above the speed limit as well. For drivers looking to bypass this congestion, the number of cars doing this will grow. | |
| 1. What is West Covina/Lewis Group of Companies' plans for traffic calming measures? | 10 |
| d. Potential for Pedestrian Strikes on Rowland Ave, SR-39, and neighboring neighborhoods. | |
| i. With the addition of at least 355 parking spaces, that is the potential for 300+ cars in this neighborhood and, per the traffic study, roughly 12,100 added trips per day. Again, with three nearby schools and these being 3-story dwellings, likely to attract new families, the impact on pedestrians is likely. | 11 |
| 4. Preliminary Hydrology Report Response: Water Run-Off Problems | |
| a. DJP Engineering, Inc. (DJP) conducted a Preliminary Hydrology Report (report) including findings of drainage and storm runoff. Replacing roughly five acres of grass with concrete/black-top and residential houses with roofs means replacing penetrable land with impenetrable materials, further contributing to storm runoff. | |
| b. There is one artificial water swale all along the east side of this property, draining to Eileen St and Rowland. The study indicates that roughly 70% of runoff flows to this swale, with two catch basins underground via pipe. The existing water runoff management of this property and by the city streets is completely ineffective. Phone calls to the City are, as well. See photos in the appendix for the flooding residents on the northside of Rowland Ave deal with in even short rainfall days. | 12 |

| | |
|--|-----------------------|
| <p>c. This flooding will only be exacerbated by the replacement of penetrable land with impenetrable materials. Besides the inconvenience of having to chase after our trash cans as they get swept away on trash day on rainy days, we face the danger of having to leap nearly four feet over floods of rain to get to cars parked on the street or walk across neighbors driveways while taking a walk.</p> | <p>12 (cont.)</p> |
| <p>i. This is a safety hazard for us residents that must be addressed before construction begins.</p> <p>ii. What is the City/Lewis Group prepared to do for flooding and water run-off?</p> | |
| <p>d. With the added impenetrable materials, the flooding will be worse, traffic will have added traffic, roads will be used more frequently, and on a flooded E Rowland Ave on rainy days.</p> | <p>12 (cont.)</p> |
| <p>i. What is the City/Lewis Group prepared to do for flooding and water run-off causing flooding and other infrastructure changes to E Rowland Ave, warranting infrastructure investment -- asphalt changes, studies, and/or upkeep?</p> | |
| <p>5. Too Many Units</p> | |
| <p>a. Roughly nine acres for 158 units is far too many people in such a small space.</p> <p>b. Market research flaws - While the studies conducted for this project provide data indicating that the average household in West Covina houses roughly three persons per household, I request a new survey be taken to assess what the new residential developments with three-story levels attract, for that does not seem to match up. Market research of new, three-story residential housing units contradicts these statements.</p> | <p>13</p> |
| <p>c. Added crime & impact on WCPD - With 158 new three-story residential housing units just a couple hundred feet from SR-39, less than one mile from I-10, and with the imminent economic crisis of the COVID-19 pandemic, with nonprofit Economic Roundtable reporting “catastrophic” impact, in fact, chronic homelessness in Los Angeles (LA) County is expected to skyrocket by 86% in next 4 years, West Covina can expect a significant increase in a vagrant and/or homeless population residing near this project, with little to no options except property theft crime to get by. With easy in-and-out access points to I-10, 158 additional homes to rob from, 355 cars to break into, West Covina Police Department (PD) can anticipate an influx of calls and crime. Us neighboring houses do not welcome an increase in crime, nor in police presence.</p> | <p>14</p> |
| <p>i. With police and fire dominating 88% of the City budget (PD-55%, Fire-33%), without this development, is the City prepared to take on such additional risk?</p> <p>1. Crime, particularly violent crime, has already begun going up all across Los Angeles County, and that will extend out here. Adding this many units, this many people, this many West Covina residents, puts us all at an added risk for opportunistic, desperate and dire times.</p> <p>a. Again, I ask, is West Covina PD prepared for this? We do not welcome this added risk.</p> | <p>14</p> |
| <p>d. Schools - Given the demographic this type of development is likely to attract, young and/or developing families will move in. This will cause an added impact on local schools. Are the local schools prepared, budget-wise for the added students they are likely to receive? This is giving West Covina the property-tax dollars, and imposing the school budget for the middle school and high school on Covina Unified School District.</p> | <p>15</p> |

e. Why are there so many? Why can't these be built farther from the existing residential single-family units, and why are they so stacked at three stories? Can they not have driveways, a yard, and some type of unifying aesthetic to resemble existing structures nearby, if even two-story ones?

16

i. Is the number of units because the City of West Covina is in such a dire situation financially and is relying on the property taxes of 158 property tax-payers? Is this simply an imposition on residents, without regard for them, and without taking a deep look at other means necessary for revamping the financial situation of the City budget?

6. Three Story Structures' Proximity to Residents

a. Many of the new high-rise developments that have been erected around the LA Metro area, particularly most if not all of the ones in West Covina, are near existing two-story or three-story civic, retail, or other non-residential type structures. This will be a huge imposition on us residents. Correct me if I am wrong, but a project of this magnitude at such a height, of such close proximity to existing residential units is unprecedented in West Covina.

b. As I mention, I live 24 yards away from the property line of this project. My backyard pool will be about 30-40 yards from a resident's closest window. Our views of the hills and skies will be drastically cut - the view of the sunrise taken away from me - but there are also no measurements put in place to protect our families from peeping Toms ogling at us in our backyards and pools.

17

i. I request an amendment to the plans for all neighboring property lines with existing residential units to be lined with shady privacy trees, not only to give privacy, but to address potential environmental mitigation impact, if this project moves forward.

7. Transparency

a. Additionally, as a resident, I hope there is transparency with this project and we can be assured without a doubt that there is no biased relation between Planning Commissioner Nickolas Lewis and Lewis Land Developers LLC, and/or Lewis Group of Companies, and/or any shared interests and/or shareholders. Furthermore, I would like a statement ensuring transparency on all levels between all contractors and all Planning Commissioners/Committee members, and Council Members.

18

Thank you for your time and attention in this matter. I look forward to hearing from you.

Regards,

Lydia K. Frey

Comment Letter Dated February 19, 2021

The general comment regarding the commenter's concerns about the proposed Walnut Grove Residential Project is noted and will be forwarded to the decision makers. It should be noted that in accordance with the State CEQA Guidelines, Section 15073, the Draft IS/MND was circulated for a 30-day public review beginning on November 19, 2020 and ending on December 21, 2020. During that time, the Draft IS/MND was available at the City of West Covina website. In light of this, it should be acknowledged that this comment letter was submitted approximately two months past the end of the review period. Nevertheless, the following responses are prepared to address the comments.

Environmental

LKF1-1 The comment states that the Leighton and Associates, Inc. *Phase I and Limited Phase II ESA* detected lead, arsenic, and organochloride pesticides and that the study recommended further studies even though the levels were identified as below the EPA thresholds for residential uses. The comment is noted and will be forwarded to the decision makers. However, as indicated in the comment, the Leighton study recommends that during site development, upon encountering the types of finds stated in the quote from the study, further investigation and analysis may be necessary. The study does not require further investigation at this time.

Section 4.9, Hazards and Hazardous Materials, of the IS/MND, was prepared based on the findings of the Leighton Phase I/II ESA in addition to the *Limited Asbestos Inspection Report* and *Lead-Based Paint/Ceramic Tile Inspection Report*, prepared by Executive Environmental and provided adequate level of detail pursuant to CEQA and CEQA Guidelines. The analysis in Section 4.9 indicated that,

The Phase I ESA did not identify the presence of previous or current hazardous materials or wastes on the site. No underground or aboveground storage tanks were observed, and no stains, corrosion, drains, sumps, pits, or wells are present on the site. The existing school uses are not occupied. Miscellaneous trash, consisting of abandoned school and office supplies and equipment, was observed in the classroom buildings, the administration building, and the cafeteria. Minor amounts of trash were observed on the exterior of the Project site. According to the Phase I ESA, this debris is not considered a recognized environmental condition (REC) associated with the Project site. Commercial and residential uses near the site do not represent a significant environmental concern due to their distances or case status. No evidence of RECs (either historical or controlled) was found on the site, and no additional assessment was recommended. The Project site is not listed as a facility that handled hazardous materials or generated hazardous wastes.

Additionally, as indicated in the comment,

According to the Limited Phase II ESA, the Project site did not detect concentrations of arsenic, lead, or organochlorine pesticides (OCPs) in excess of the U.S. Environmental Protection Agency (USEPA) Residential Regional Screening Levels (RSLs) or Department of Toxic Substance Control Screening Levels (DTSC-SLs).

The analysis identified that due to the age of the structures, asbestos-containing materials (ACM) and lead based paint (LBP) were anticipated to be present. However, the studies concluded that demolition, removal, and disposal of ACM and LBP would comply with existing regulatory requirements, including the Federal and State Occupational Safety and Health Regulations (OSHA and CalOSHA); SCAQMD Regulation X, Subpart M – National Emission Standards For Asbestos and Rule 1403 – Asbestos Emissions (see RR HAZ-2); and California Code of Regulations Title 8, Section 1532.1 – Lead and Section 1529 – Asbestos. With compliance with these regulations, which are reflected in RR HAZ-1 through RR HAZ-3, the impacts would be less than significant.

- LKF1-2 The comment pertaining to hydrology states that by replacing five acres of penetrable land with impenetrable materials, there will be significant impacts, as runoff from the site will have more contaminants. The comment also says that “with the cars parked in the 355+ spaces provided, contaminants will be directly into the water swale and into the catch basins . . .” The comment is not clear and does not identify where the 355+ spaces are provided. The proposed Project will include a total of 99 surface guest parking spaces in addition to 316 spaces in garages.

Section 4.10, Hydrology and Water Quality, of the IS/MND provided a detailed analysis of potential water quality impacts during construction and operation of the Project and concluded that impacts would be less than significant with compliance with regulations. During operations, the analysis indicates that the Project would generate sediment, trash and debris, oil and grease, bacterial indicators, nutrients, and pesticides that would come from landscaped areas, drive aisles, parking areas, and outdoor residential activities. However, the Project Applicant would be required to prepare and implement a standard urban stormwater mitigation plan (SUSMP) (reflected in RR HYD-2), which would include low impact development, structural and non-structural BMPs and source control BMPs. Compliance with RR HYD-1 and RR HYD-2 would reduce the risk of water degradation from soil erosion and other pollutants, and potential violations of water quality standards would be minimized through required BMPs. Consequently, the Project would not violate water quality standards or waste discharge requirements.

- LKF1-3 The comment expresses concerns for the nesting birds and identifies nests on existing trees (photographs provided in Appendix III, Nesting Birds). The comment is noted and will be forwarded to the decision makers. Section 4.4, Biological Resources, of the IS/MND provides a detailed discussion of potential impacts pertaining to nesting birds, as related to Threshold (d). Based on the analysis, in light of the presence of trees and vegetation on the site, there is potential for birds protected by the Federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code to nest at the site. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 Code of Federal Regulations [CFR] Section 10.13, as amended). In order to protect the birds, if demolition and site clearing activities occur during the nesting season, a mitigation measure (MM BIO-1) is recommended to avoid impacts to nesting birds and their fledglings. Per MM BIO-1, a pre-construction survey will occur to find out if nests are present. The provisions of MM BIO-1 require that the start of demolition and site preparation would occur outside of the bird nesting and breeding season; if nests are within 200 feet of the impact area, a temporary buffer will be erected; and construction activities will be postponed until juveniles have fledged from the nest. Additionally, a biologist will serve as a construction monitor during those periods

when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

It should also be noted that upon completion of construction and landscaping activities on the site, newly planted trees and landscaping would provide nesting habitat for migratory birds. In light of the above provisions in place, impacts would be less than significant.

- LKF1-4 The comment states that removal of trees would be an environmental impact and further identifies the importance of trees and grass in terms of carbon dioxide absorption. The comment is noted and will be forwarded to the decision makers. Section 4.4, Biological Resources (Threshold e), of the IS/MND identifies removal of the said trees in order to accommodate development of the Project. Per the discussion, a permit will be required to remove trees, as oak trees are native to California and are considered heritage trees. Therefore, the Project would be subject to Chapter 26, Article VI, Division 9, Preservation, Protection, and Removal of Trees, of the West Covina Municipal Code. This requirement is reflected in RR BIO-1.

Additionally, the carbon dioxide emissions for the Project were quantified and were found to be under the SCAQMD-recommended threshold of 3,000 MTCO₂e/year, as stated in Section 4.XX, Greenhouse Gas Emissions, of the IS/MND. Also, the Project would plant over 200 trees and provide ample landscaping, which would sequester carbon dioxide.

- LKF1-5 The commenter states that the study on the City's website indicates that "the equipment may only temporarily have an impact on the air quality of local residents". Please note, Section 4.3, Air Quality, of the IS/MND provides a detailed analysis of construction and operations air quality for the proposed Project. Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program. CalEEMod is designed to model construction and operational emissions for land development projects. Based on the quantified analysis, none of the criteria pollutants for the estimated maximum daily emissions during construction of the Project exceeded the South Coast Air Quality Management District's (SCAQMD's) daily regional emission thresholds. As shown in Table 4-5 on page 4-19 of the Air Quality section, all criteria pollutants are below the SCAQMD's respective thresholds. Therefore, no significant impacts would result.

Public Utilities & Electric

- LKF1-6 The commenter states that there is no study published with the list of commenters, including Southern California Edison (SCE). The comment pertaining to the potential rolling blackout in peak heat season is noted and will be forwarded to the decision makers.

Please note, the *Responses to Comments on the Draft Initial Study/Mitigated Negative Declaration, Walnut Grove Residential Project*, dated February 2021 has been available on the City's website. Section 2.0 of the document includes a table that lists the commenters. The City received a total of eight comments, one comment from Caltrans District 7; one comment from Los Angeles County Sanitation Districts; and six comment letters from individuals. No letter was received from SCE, even though an electronic copy of the IS/MND and a Notice of Intent (NOI) were sent, and they were received by the SCE. Thus, SCE has been made aware of the Project.

Traffic Study Flaws

LKF1-7 The comment inquires if Caltrans was notified of this Project. Caltrans is aware of the Project and provided comments, indicating that the Project is unlikely to have a notable impact to their facilities. The Project is expected to generate 1,124 trips per day, not the 12,000 noted in the comment. The proposed resident parking (i.e., 2 spaces per unit) and 99 parking spaces for the guests are consistent with City standards as well as the Walnut Grove Specific Plan. Existing traffic volumes were taken from 2017 and a growth rate was applied to estimate 2020 volumes, as detailed in the report. Traffic volumes have decreased significantly during the ongoing COVID-19 pandemic, so volumes collected now would not accurately represent non-pandemic conditions.

LKF1-8 The comment expresses concern about the number of units and “only one” entrance and exit on Rowland Avenue as well as potential accidents. The comment is noted and will be forwarded to the decision makers. Trip generation is not based on number of occupants, but instead is based on number of units. The Project will have two driveways on East Rowland Avenue, both of which will serve entering and exiting traffic. Approximately 40 total inbound Project trips are expected to be added to the East Rowland Avenue/Azusa Avenue intersection in the peak hour for all approaches combined, which may have a nominal effect on operations. However, the northbound left turn operates as a protected only movement (left turns are only allowed on green arrow, not during southbound through traffic), so there should not be any conflicts between northbound left turn vehicles and southbound right turn vehicles unless a driver is running a red light. If red light running is an issue at the intersection, law enforcement can be notified, and enforcement can be increased at the intersection.

Additionally, it should be recognized that not all units in the proposed development will be three stories. The Project would include construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories.

This comment also expressed concern for potential pedestrian accident. The comment is noted and will be forwarded to the decision makers. If students from the Project site decide to walk to school, they will be able to cross the major roadways (Lark Ellen or Azusa Avenue) to reach their school at a signalized intersection. While additional pedestrians can generally increase the risk of pedestrian-involved crashes, having the opportunity to cross at a signalized intersection is generally considered one of the safest options for pedestrians. It is the responsibility of the pedestrians to be aware of their surroundings and cross when indicated, and it is the responsibility of drivers to yield to pedestrians. If the intersection has a high incidence of drivers running red lights or not yielding to pedestrians, law enforcement presence can be increased to help improve driver behavior.

LKF1-9 The comment states that Caltrans recommends traffic calming measures. The comment is noted; however, Caltrans comments do not specifically recommend traffic calming measures; instead, they recommend incorporation of multi-modal and complete streets elements. The Project will include on-site pedestrian and bicycle facilities and on-street parking will be prohibited along the frontage of the Project, providing additional area for cyclists. The comments state support for traffic calming

features, but none is required by the City at this time. However, if speeding is an existing issue, the City can evaluate various approaches to reducing speeds including increased enforcement and/or construction of a road diet (reducing travel lanes to one per direction).

At most, there are expected to be 61 vehicles exiting the property during the AM peak hour (fewer in the PM peak hour), and they will be able to do so from either property access point. The west access will allow left turns directly on to Rowland Avenue. If drivers do choose to make a U-turn at Homerest, the outside through lane will allow other drivers to continue west. Of the 61 exiting vehicles, approximately 60 percent (36 vehicles) are expected to travel towards Azusa Avenue.

LKF1-10 Assuming this comment is concerning cut-through traffic through the residential areas between East Rowland Avenue and Puente, the concern is noted and will be forwarded to the decision makers. This issue is beyond the scope of this Project. The commenter can discuss speed calming measures with the City, and the City may evaluate other options to reduce cut-through traffic.

LKF1-11 It should also be noted that the increase in traffic is not quantified based the number of cars in each household but rather based on the type of development that is proposed, in this case single- and multi-family residential. Thus, traffic trips commensurate with the type of residential development. The single-family detached units would generate 9.44 daily trips per day, and the multi-family units would generate 5.44 daily trips per unit. These generation rates have been derived from the Institute of Transportation Engineers' (ITE's) *Trip Generation Manual*, 10th Edition, as discussed in Section 4.17, Transportation, of the IS/MND. Using these rates, the proposed Project's daily trip generation is 1,124 trips per day, with approximately 82 AM peak hour trips and 106 PM peak hour trips. In light of this, please note, the Project will not add a total of 12,100 trips per day as indicated in the comment. Pedestrian facilities will be provided on site and will tie into the existing sidewalks along East Rowland Avenue. If school children do move into the area and end up walking to their perspective schools, they will be able to do so by crossing one signalized intersection. Further, if students walk to school (accompanied by parents or alone), that may reduce the total number of trips generated by the site.

Preliminary Hydrology Report Response: Water Run-Off Problems

LKF1-12 The comment regarding the findings of drainage and storm runoff is noted and will be forwarded to the decision makers. Please refer to Response LKF-2, above, regarding replacement of "penetrable land" with "impenetrable materials," contributing to runoff.

The comment regarding runoff (photos in Appendix I) and the existing management of runoff being ineffective is noted and will be forwarded to the decision makers. The channel that extends across the northwest and western boundary of the site currently accepts offsite drainage from the commercial center north of the Project. With implementation of the proposed Project, the current flows from offsite will be intercepted at the northern cul-de-sac (North Eileen Street) and re-routed through the Project site through an underground drainage system. Following completion of the drainage improvements at the North Eileen Street cul-de-sac, the road will be repaired to resurface damaged areas associated with the construction effort.

Further, the comment repeats that the replacement of “penetrable land” with “impenetrable materials,” will exacerbates the flooding condition. Please refer to Response LKF-2, above for additional discussion. It should also be noted that the current flooding condition referenced by the commenter and shown on photos in Appendix I is a condition that exists regardless of the proposed Project, and the Applicant bears no responsibility for addressing it.

Too Many Units

LKF1-13 The comment regarding market research flaws is noted and will be forwarded to the decision makers. As noted above in Response LKF-9, not all units in the proposed development will be three stories. The Project would include construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories. Additionally, it should be recognized that the three-story multi-family units will be located on the eastern portion of the site, along the existing commercial uses and/or surface parking lot, while the two-story single-family units will be located on the western portion and adjacent to existing residential uses.

LKF1-14 The comment regarding crime and impact on West Covina Police Department (WCPD) is noted and will be forwarded to the decision makers. The comment regarding the City experiencing an increase in homeless population near the Project leading to property theft crimes is the opinion of the commenter and speculative at best. Additionally, there is no nexus between development of the proposed Project and increase in crimes by the homeless population. The conclusion is drawn based on personal opinion and speculation. No backup documentation, with the exception of the Economic Roundtable reporting, and no substantial evidence is provided. No further response is required.

LKF1-15 The comment regarding impact on local schools by the future residents of the proposed Project is noted and will be forwarded to the decision makers. The analysis in the IS/MND acknowledges that the 529 future residents of the development will potentially have school aged children requiring school services from the Covina-Valley Unified School District (C-VUSD). The C-VUSD serves 12,500 students¹ in eight elementary schools, three middle schools, and four high schools. According to student generation rates for residential land uses within the C-VUSD, the Project may generate 28 elementary school students, 15 middle school students, and 24 high school students, for a total of 66 students.

The Project would pay school development fees to the C-VUSD for the improvement of school facilities that would be needed to serve the Project’s demand for school services and facilities. This requirement is reflected in RR PS-3 in Section 4.15, Public Services, of the IS/MND. As provided under Section 17620 of the *California Education Code* and Section 65970 of the *California Government Code*, the payment

¹ Based on 2013-2014 student enrollment at C-VUSD, last available data from California Department of Education Educational Demographics Unit: <https://dq.cde.ca.gov/dataquest/Enrollment/EthnicEnr.aspx?cChoice=CoEnrEth2&cYear=2013-14&TheCounty=19,Los%20Angeles&cLevel=County&cTopic=Enrollment&myTimeFrame=S&cType=ALL&cGender=B>

of statutory school development fees would fully mitigate a project's impacts on schools. Thus, the impacts would be less than significant.

- LKF1-16 The commenter questions the number of proposed units and assumes the Project is a three-story development. Please refer to Response LKF-11, above, for a discussion of the proposed components of the Project.

The comment regarding the City of West Covina being in a dire financial situation is noted and will be forwarded to the decision makers. This is not CEQA issues, and no further response is required.

Three Story Structures' Proximity to Residents

- LKF1-17 The comment states that the Project with the proposed height and close proximity is an imposition on the existing residential units, and that such a project should be located near non-residential uses. The comment implies that the proposed Project is a high-rise development. The comment is noted and will be forwarded to the decision makers.

The proposed Project includes construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories. A maximum height of three stories is not considered a high-rise development. According to California Building Code (CBC), a *high-rise building* is defined in Chapter 2 as "Every building of any type of construction or occupancy having floors used for human occupancy located more than 75 feet above the lowest floor level having building access . . ." Typically, a 5-story building could be considered a "high-rise" building. Thus, the proposed Project with a maximum height of approximately 40 feet (40'-4") is not considered a high-rise.

The proposed Project provides adequate setback along the northern property line, which interfaces the existing residential units. In fact, the proposed setback is larger than what the zoning requires for the adjacent residential zone. Additionally, the features in place would create buffers between the existing and proposed homes, which would provide and maintain privacy, soften the interface, and promote compatibility.

Regarding backyard pool privacy, it should be noted that the windows on the second story units along the north side of the property have been modified to a height that will make it impractical for the future residents in those units to have downward visibility into the existing adjacent properties. Further, the designated 7.5-foot landscape buffer is intended to be planted with *Podocarpus Gracilior* (or similar) and maintained on a regular basis. The purpose of the buffer is to provide additional privacy. The landscape buffer will not be a maintenance obligation of the individual unit owner. To keep the landscape buffer uniform, the plant material will be maintained by the homeowners association for the Project.

Regarding views, the discussion in Section 4.1, Aesthetics, of the IS/MND provides a detailed analysis of potential visual impacts of the proposed Project. While the proposed Project would alter the existing visual character of the Project site from a school use to a residential development and would change views from the

surrounding public vantage point² (i.e., East Rowland Avenue), this change would not be considered a degradation of the Project site or its surroundings. The new development would replace older structures and increase visual interest and character of the site with quality design and landscaping. The Project would be required to comply with Section 26-547, Specific Plan (S-P) zone, which has requirements for design elements, such as orientation of buildings and uses, building bulk and scale, building height and setback, parking, traffic generation, noise and landscaping (RR AES-1). Therefore, this would ensure that the design of the Project uses would be compatible with the surrounding uses and the General Plan requirements. Additionally, as indicated above, the proposed units adjacent to existing residential uses will be two-story single family units and not three stories.

Transparency

LKF1-18 The commenter is hoping for transparency and that there is no relation between the Planning Commissioner Nickolas Lewis and the Applicant. The commenter also asks for a statement ensuring transparently. The comment is noted and will be forwarded to the decision makers. No further response is required.

² Please note, the updated Appendix G of the State CEQA Guidelines (Aesthetics section, Threshold c), considers “public” and not “private” views of the site. The threshold defines public views as, “those that are experienced from publicly accessible vantage point).

Amendments

- I. Rather than 128 three-story units, I want to submit that, instead, something benefiting the community is preferable to me, Lydia K. Frey, an E Rowland Ave resident.
- II. Aquatics Center -- In Southern California, particularly in this area, many homes have pools. For people who don't, they know their children will either visit a grandparent or a friend with a pool, and it is a safety concern, as well as a socialization concern and developmental concern, to provide their children with aquatic safety lessons. I suggest a community recreation center with a pool.
 - A. I own a small business providing aquatic safety lessons; a project like this would actually be my competition. However, given my experience and expertise, there is a real need that is not being met for sufficient aquatic safety lessons.
 - B. Tearing down a school and, rather than stacking 128 three-story units, increasing West Covina's risk for infrastructure problems, crime problems to residents, West Covina's carbon footprint and effectively offsetting a significant portion of its current mitigation, replacing it with something similar to the La Verne Aquatics center, with a small park, will be of major benefit to the City and the Community.

If this land has already been sold and the Lewis Group is unwilling to sell it back, the Lewis Group can commodify this, similar to other sports parks and soccer centers, and charge a fee for use and/or rentals, whilst providing lifeguards on duty.

I would rather see something benefitting my community.

Thank you, Joanne. Please confirm that these will be in the Packet, added to my statements. Thank you.

Regards,
Lydia

Lydia K. Frey
February 24, 2021

Lydia K. Frey

Comment Letter Dated February 24, 2021

LKF2-1 The commenter provides suggestions and ideas for the development of the site that would replace the proposed development concept. The comment erroneously makes references to the proposed Project as a “three-story” development. As indicated in the responses to the previous letter by the commenter, not all units in the proposed development will be three stories. The Project would include construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be three stories, and the single-family units will be two stories. The three-story multi-family units will be located on the eastern portion of the site, along the existing commercial uses and/or surface parking lot, while the two-story single-family units will be located on the western portion and adjacent to existing residential uses.

The commenter’s suggestion regarding an “Aquatics Center” in lieu of the proposed development is the opinion of the commenter. No further response is required.

To: Joanne Burns, West Covina Planning Department

I am writing to express my concerns regarding the proposed Walnut Grove Residential Project, 1651 East Rowland Avenue. I have lived three houses down from this site, on the same side of the street, for many years. I have many reservations about this project. But first I ask you to consider, as a homeowner, how you would feel if a project of this size, housing so many people, were to be built next to you. I think it is easy to forget that this is an established neighborhood, where people have lived for many years in relative peace and quiet, so this project would negatively affect us. Below are my concerns:

1

1) There are too many proposed single family homes and townhouses for such a small space. As I drive around West Covina and surrounding cities, I have seen many new condo/townhouse complexes spring up. I have not seen any built in neighborhoods surrounded by other houses. The ones I've seen are surrounded by businesses or on the edge of a business district with no single family homes nearby. The complex is it's own neighborhood and there are no other homes to disturb or interfere with. I have not seen a combination of single family dwellings and Condo/townhouses. This project looks like the developers are trying to build as many dwellings as they can to boost their profits, much to the detriment of the current homeowners in the surrounding area.

2

2) I am concerned that there are only a few entrances and exits for so many people and cars. I am also concerned that they are only located on Rowland Avenue. They are not spread throughout the surrounding streets to help offset congestion. The traffic now is busy. I can't imagine what it will be like if over two hundred more drivers are in such a small space and all coming onto Rowland Avenue.

3

3) These proposed dwellings will bring in many new families. The neighborhood and surrounding areas will be hard pressed to absorb this many people.

4

4) All the added concrete will cause more water runoff and no rain absorption. Right now when it rains the northside of Rowland Avenue will sometimes get flooded. When this happens, my neighbors and I have to put our trash barrels on the grass in front of the street and not in front of the curb. We do this to keep our barrels from being swept away since our side of the street (north) is lower than the south side of the street. Even though it hasn't rained much this Winter, I have already had to retrieve my barrels several houses away when a downpour happened unexpectedly.

5

I hope you will consider my concerns and rethink this proposed site or at least reduce the number of structions. We don't need a seperate village within an existing neighborhood.

Thank you for considering my concerns.

Vicki Claudius

Comment Letter Dated February XX, 2021

The general comment regarding the commenter's concerns about the proposed Walnut Grove Residential Project is noted and will be forwarded to the decision makers. It should be noted that in accordance with the State CEQA Guidelines, Section 15073, the Draft IS/MND was circulated for a 30-day public review beginning on November 19, 2020 and ending on December 21, 2020. During that time, the Draft IS/MND was available at the City of West Covina website. In light of this, it should be acknowledged that this comment letter was submitted to the City of West Covina approximately two months past the end of the review period. Nevertheless, the following responses are prepared to address the comments.

VC1-1 The commenter expressed reservations about the proposed Walnut Grove Residential Project living three houses from the site, and that the proposed development will negatively affect the existing neighborhood and the peace and quiet that they have enjoyed. The comment is noted and will be forwarded to the decision makers. No further response is required.

VC1-2 The comment regarding the type and number of units proposed is noted and will be forwarded to the decision makers. The commenter states that she has not seen the combination of single-family and condo/townhouses being built within an established residential neighborhood. The Project would include construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories. Additionally, it should be noted that in consideration of the existing uses, the three-story multi-family units will be located on the eastern portion of the site, along the existing commercial uses and/or surface parking lot, while the two-story single-family units will be located on the western portion and adjacent to existing residential uses.

Additionally, the proposed Project provides adequate setback along the northern property line, which interfaces the existing residential units. In fact, the proposed setback is larger than what the zoning requires for the adjacent residential zone. Additionally, the features in place would create buffers between the existing and proposed homes, which would provide and maintain privacy, soften the interface, and promote compatibility. In light of the above design consideration, no incompatibility impacts would be anticipated.

The comment regarding the developers boosting their profits is noted and forwarded to the decision makers. This comment expresses the opinion of the commenter. No further response is required.

VC1-3 The commenter is concerned about few entrances/exits for the Project in light of the number of people and cars, and all cars "coming onto Rowland Avenue" will exacerbate traffic. The comment is noted and forwarded to the decision makers. The proposed Walnut Grove Residential development is designed per the requirements as stated in the Walnut Grove Specific Plan and in compliance with City regulations. In designing the entries/exits for the Project, the number of units and the future residents were considered. Thus, in light of safety requirements, the number of entries/exits are appropriate for the proposed development.

In terms of traffic, Section 4.17, Transportation, of the IS/MND includes a detailed analysis of the potential traffic impacts of the proposed Project. While it is acknowledged that the Project would generate trips and increase traffic, construction traffic is not likely to create any significant impact due to the size of the proposed Project. Additionally, during Project operations, the limited number of Project trips is unlikely to result in any impacts at roadways and intersections near the site and in the surrounding area. The number of vehicles being added will be a relatively small percentage of the existing traffic in the area. As such, the analysis does not identify any mitigation measures, as none is required.

VC1-4 The comments states that the proposed Project will result in a large number of people in the area. The comment is noted and will be forwarded to the decision makers. Section 4.14, Population and Housing, of the IS/MND provides an analysis of the future population associated with the development. The Walnut Grove Project would directly generate approximately 529 residents. This would increase the City's resident population of 105,999 persons by 0.5 percent to 106,528 residents. It would also increase the City's housing stock of 32,919 (Department of Finance 2020) by 0.48 percent to 33,077 units. However, these increases would be within anticipated growth for the City as projected by Southern California Association of Governments (SCAG) at 116,700 residents, 35,000 households, and 34,300 jobs by 2040 (SCAG). Therefore, the increase in population in the area is not such that would negatively impact the surrounding area.

VC1-5 The comment regarding the increase in runoff as a result of the proposed development is noted and will be forwarded to the decision makers. The Project includes drainage improvements. The channel that extends across the northwest and western boundary of the site currently accepts offsite drainage from the commercial center north of the Project. With implementation of the proposed Project, the current flows from offsite will be intercepted at the northern cul-de-sac (North Eileen Street) and re-routed through the Project site through an underground drainage system. Following completion of the drainage improvements at the North Eileen Street cul-de-sac, the road will be repaired to resurface damaged areas associated with the construction effort. It should be noted that the current flooding condition referenced by the commenter is a condition that exists regardless of the proposed Project.

The comment regarding reducing the number of structures is noted and will be forwarded to the decision makers. The comment regarding the Project being a separate village within an existing neighborhood is the opinion of the commenter. No further response is required.

The comment regarding runoff is noted and will be forwarded to the decision makers. The channel that extends across the northwest and western boundary of the site currently accepts offsite drainage from the commercial center north of the Project. With implementation of the proposed Project, the current flows from offsite will be intercepted at the northern cul-de-sac (North Eileen Street) and re-routed through the Project site through an underground drainage system. Following completion of the drainage improvements at the North Eileen Street cul-de-sac, the road will be repaired to resurface damaged areas associated with the construction effort. It should be noted that the current flooding condition referenced by the commenter is a condition that exists regardless of the proposed Project.

February 20, 2020

Joanne Burns

Planning Department, West Covina
1444 W Garvey Ave S #208
West Covina, CA 91790

Dear Ms. Burns,

I am writing to express additional concerns regarding the development planned for the Walnut Grove residential project on Rowland Avenue in West Covina (the City) by Lewis Group of Companies. Below are my concerns:

1. Environmental

- a. The Leighton and Associates, Inc. (Leighton) study detected lead, arsenic, and Organochloride Pesticides, though Leighton states the levels fall below the EPA threshold restrictions for residential land use. However, after their results findings in this Level I study, they recommend further studies. It states:

“In general, observations should be made during future subject site development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, and tanks, stained soil or odorous soils. Should such materials be encountered, further investigation and analysis may be necessary at that time.”

1

- i. As a resident on Rowland Avenue between Azusa Avenue and Homerest Avenue, I agree with Leighton and Associates, Inc. (Leighton) and demand further studies.

- b. As mentioned in my Hydrology point, the Lewis Group and the City intends to replace roughly five acres of penetrable land with impenetrable materials. Water run-off from the Walnut Grove site will have significantly more contaminants. With the cars parked in the 355+ spaces provided, contaminants will go directly into the water swale and into the catch basins as recommended by DJP Engineering Inc.. What is existing needs to be investigated and repaired before anything new gets installed. The water run-off will go to the West Covina wash and into the ocean, therefore, there is an environmental impact from this project.

2

- c. Nesting Birds - Nesting in two of the trees on the west side of the property on 1651 E Rowland Ave are three birds nests visible to the naked eye in the top two thirds of the trees. As an average lay person, I cannot tell if I tried to determine if these are the only nests existing in the trees on the property, nor can I tell what the species is.

- i. I request further studies be conducted to determine protections, if any, should be provided to these nesting birds, their migration patterns, if any, whether or not these birds or any other species nesting or habitating on or in the property, will have their habitat taken away from them, and/or if any of those species rely on this property annually or on a regular schedule for nesting/mating/etc.

3

| | | |
|-------|---|---|
| d. | Removal of the nine significant trees, including the five heritage oak trees, does, in fact, have an environmental impact. It is estimated that each tree absorbs about 31 lbs. of carbon dioxide each year, per the nonprofit corporation Saving Nature, Inc. Removing roughly five acres of grass is also detrimental, for a 1,000-square-meters area of grass will take up around one tonne of carbon per year; this proposed project removes roughly 20k square meters. | 4 |
| e. | Air Quality: One study on the City website of Projects and Environmental Documents states that the equipment may only temporarily have an impact on the air quality of local residents, however, that is more than any of us asked for. | 5 |
| <hr/> | | |
| 2. | Public Utilities & Electric | |
| a. | There is no study published or list of commenters that submitted written comments on the Draft IS/MND including Southern California Edison (SCE), our local utility for electricity, which has increasingly been feverishly working to combat the occurrence of wildfires due to unforeseen circumstances where they source their power grids. What has the city/Lewis Group of Companies done to let SCE know of the additional 158 three-story dwellings that are going to be added to their power grids during our environmental crises of climate change? | 6 |
| i. | What is the City going to do for not just the 158 dwellers likely to get a rolling blackout in peak-heat season, but the rest of us in this neighborhood? | |
| ii. | Additionally, many of these community members within this neighborhood block are elderly. Putting such an additional power grid strain in such a small area will put many of these long standing community members, who happen to be seniors, in harm's way. | |
| <hr/> | | |
| 3. | Traffic Study Flaws: | |
| a. | Highway 39 - Was CalTrans alerted of this project? With the number of units planned, the number of parking spots, 150% for dwellers, assuming most of them will be commuters using their vehicles on Azusa Avenue/SR-39 traveling either northbound or southbound to use I-10 or I-210, that is adding at least 12,000 cars per day based off of the study using data from 2017 projections. | 7 |
| i. | This data should be revisited. Using traffic studies that old, and prior to the world-changing COVID-19 pandemic lacks foresight. | |
| ii. | The Northbound left-hand turn pocket is so small (200-foot length pocket) and the Lewis group plans to build 158 three-story homes (with their self-published study predicting a population increase of only three people moving in per unit) and at least 355 parking spaces, with only one entrance and exit only on Rowland Avenue. | |
| iii. | Additionally, the southbound right-hand turn pocket on SR - 39 is shared with a bus stop. | 8 |
| iv. | This added traffic increases the probability of accidents because people will try to avoid the bus when turning right and people will be trying to catch that left-hand turn light. | |
| v. | Given that these are 3 story residential units, and that two of the schools the children residing in these homes will be assigned to are across SR-39 from the proposed project, there is also added risk of potential pedestrian strike on a state-owned highway here. | |
| <hr/> | | |
| b. | Potential for Accidents on Rowland Ave: | |
| c. | Currently, CALTRANS recommends in their comments traffic calming measures. There are absolutely no traffic calming measures on Rowland from Grand Ave to Sunset Ave. The only entrance and exit to this proposed development are on Rowland. With the predicted 108 peak | 9 |

| | |
|--|----------------------|
| <p>a.m./p.m. traffic trips, it is fair to assume that many of them will want to head to I-10. I-10 takes you to the Los Angeles area and to the Ontario/Riverside area, and more. This one exit from this development will cause congestion at the Rowland Ave/Homerest Ave intersection with about 100 cars hoping to make a U-turn to get onto Azusa Ave to get onto I-10. Or, perhaps making a left onto Homerest Ave and driving through that neighborhood block and then turning left on Workman Ave, then right on Azusa Ave/SR-39. The speed limit on E Rowland Ave between Azusa Ave and Lark Ellen Ave, between three schools -- Covina High School, Traweek Middle School, and Rowland Avenue Elementary School -- is 35 MPH. Surely, as a resident, I can hear and feel the vibrations to honestly report that most of the drivers on Rowland do not follow this speed limit. Thus, roughly 108 cars will be trying to exit this complex, causing massive congestion for already-road-raged drivers at peak time, between three schools. The length between the exit driveway of Pioneer school and the U-turn point at Homerest gives cars 513 feet of length to block drivers.</p> | <p>9 (cont.)</p> |
| <p>i. To my point, what is West Covina/Lewis Group of Companies' plans for traffic calming measures?</p> <p>ii. Between Rowland and Puente, there are side streets where cars drive above the speed limit as well. For drivers looking to bypass this congestion, the number of cars doing this will grow.</p> <p>1. What is West Covina/Lewis Group of Companies' plans for traffic calming measures?</p> | <p>10</p> |
| <p>d. Potential for Pedestrian Strikes on Rowland Ave, SR-39, and neighboring neighborhoods.</p> <p>i. With the addition of at least 355 parking spaces, that is the potential for 300+ cars in this neighborhood and, per the traffic study, roughly 12,100 added trips per day. This adds potential for pedestrians being struck by a car, whether on state-owned SR-39, city-owned Rowland Ave, and right-of-way sidewalks, while crossing the street. Additionally, with three nearby schools and these being 3-story dwellings, likely to attract new families, the impact on pedestrians is likely.</p> | <p>11</p> |
| <p>4. Preliminary Hydrology Report Response: Water Run-Off Problems</p> <p>a. DJP Engineering, Inc. (DJP) conducted a Preliminary Hydrology Report (report) including findings of drainage and storm runoff. Replacing roughly five acres of grass with concrete/black-top and residential houses with roofs means replacing penetrable land with impenetrable materials, further contributing to storm runoff.</p> <p>b. There is one artificial water swale all along the east side of this property, draining to Eileen St and Rowland. The study indicates that roughly 70% of runoff flows to this swale, with two catch basins underground via pipe. The existing water runoff management of this property and by the city streets is completely ineffective. Phone calls to the City are, as well.</p> <p>c. This flooding will only be exacerbated by the replacement of penetrable land with impenetrable materials. Besides the inconvenience of having to chase after our trash cans as they get swept away on trash day on rainy days, we face the danger of having to leap nearly four feet over floods of rain to get to cars parked on the street or walk across neighbors driveways while taking a walk.</p> <p>i. This is a safety hazard for us residents that must be addressed before construction begins.</p> | <p>12</p> |

| | |
|---|---------------|
| <ul style="list-style-type: none"> ii. What is the City/Lewis Group prepared to do for flooding and water run-off? | 12 |
| <ul style="list-style-type: none"> d. With the added impenetrable materials, the flooding will be worse, traffic will have added traffic, roads will be used more frequently, and on a flooded E Rowland Ave on rainy days. <ul style="list-style-type: none"> i. What is the City/Lewis Group prepared to do for flooding and water run-off causing flooding and other infrastructure changes to E Rowland Ave, warranting infrastructure investment -- asphalt changes, studies, and/or upkeep? | 12 (cont.) |
| <hr/> | |
| 5. Too Many Units | |
| <ul style="list-style-type: none"> a. Roughly nine acres for 158 units is far too many people in such a small space. b. Market research flaws - While the studies conducted for this project provide data indicating that the average household in West Covina houses roughly three persons per household, I request a new survey be taken to assess what the new residential developments with three-story levels attract, for that does not seem to match up. Market research of new, three-story residential housing units contradicts these statements. | 13 |
| <hr/> | |
| <ul style="list-style-type: none"> c. Added crime & impact on WCPD - With 158 new three-story residential housing units just a couple hundred feet from SR-39, less than one mile from I-10, and with the imminent economic crisis of the COVID-19 pandemic, with nonprofit Economic Roundtable reporting “catastrophic” impact, in fact, chronic homelessness in Los Angeles (LA) County is expected to skyrocket by 86% in next 4 years, West Covina can expect a significant increase in a vagrant and/or homeless population residing near this project, with little to no options except property theft crime to get by. With easy in-and-out access points to I-10, 158 additional homes to rob from, 355 cars to break into, West Covina Police Department (PD) can anticipate an influx of calls and crime. Us neighboring houses do not welcome an increase in crime, nor in police presence. <ul style="list-style-type: none"> i. With police and fire dominating 88% of the City budget (PD-55%, Fire-33%), without this development, is the City prepared to take on such additional risk? <ul style="list-style-type: none"> 1. Crime, particularly violent crime, has already begun going up all across Los Angeles County, and that will extend out here. Adding this many units, this many people, this many West Covina residents, puts us all at an added risk for opportunistic, desperate and dire times. <ul style="list-style-type: none"> a. Again, I ask, is West Covina PD prepared for this? We do not welcome this added risk. | 14 |
| <hr/> | |
| <ul style="list-style-type: none"> d. Schools - Given the demographic this type of development is likely to attract, young and/or developing families will move in. This will cause an added impact on local schools. Are the local schools prepared, budget-wise for the added students they are likely to receive? This is giving West Covina the property-tax dollars, and imposing the school budget for the middle school and high school on Covina Unified School District. | 15 |
| <hr/> | |
| <ul style="list-style-type: none"> e. Why are there so many? Why can't these be built farther from the existing residential single-family units, and why are they so stacked at three stories? Can they not have driveways, a yard, and some type of cohesive, unifying aesthetic to resemble existing structures nearby, if even two-story ones? <ul style="list-style-type: none"> i. Is the number of units because the City of West Covina is in such a dire situation financially and is relying on the property taxes of 158 property tax-payers? Is this simply an imposition on residents, without regard for them, and without taking a deep look at other means necessary for revamping the financial situation of the City budget? | 16 |

6. Three Story Structures' Proximity to Residents

- a. Many of the new high-rise developments that have been erected around the LA Metro area, particularly most if not all of the ones in West Covina, are near existing two-story or three-story civic, retail, or other non-residential type structures. This will be a huge imposition on us residents. Correct me if I am wrong, but a project of this magnitude at such a height, of such close proximity to existing residential units is unprecedented in West Covina.
- b. Our views will be forever changed - the view of the sunrise taken away from some, the mountain views taken away from others - but there are also no measurements put in place to protect our families from peeping Toms ogling at our neighbors in backyards and pools.
 - i. I request an amendment to the plans for all neighboring property lines with existing residential units to be lined with shady privacy trees, not only to give privacy, but to address potential environmental mitigation impact, if this project moves forward.

17

7. Transparency

- a. Additionally, as a resident, I hope there is transparency with this project and we can be assured without a doubt that there is no biased relation between Planning Commissioner Nickolas Lewis and Lewis Land Developers LLC, and/or Lewis Group of Companies, and/or any shared interests and/or shareholders. Furthermore, I would like a statement ensuring transparency on all levels between all contractors and all Planning Commissioners/Committee members, elected officials, employees, and Council Members.

18

I hope this information will be given due diligence.

Sincerely,

Vicki Claudius

Comment Letter Dated February 20, 2021

The general comment regarding the commenter's concerns about the proposed Walnut Grove Residential Project is noted and will be forwarded to the decision makers. It should be noted that in accordance with the State CEQA Guidelines, Section 15073, the Draft IS/MND was circulated for a 30-day public review beginning on November 19, 2020 and ending on December 21, 2020. During that time, the Draft IS/MND was available at the City of West Covina website. In light of this, it should be acknowledged that this comment letter was submitted approximately two months past the end of the review period. Nevertheless, the following responses are prepared to address the comments.

Environmental

VC2-1 The comment states that the Leighton and Associates, Inc. *Phase I and Limited Phase II ESA* detected lead, arsenic, and organochloride pesticides and that the study recommended further studies even though the levels were identified as below the EPA thresholds for residential uses. The comment is noted and will be forwarded to the decision makers. However, as indicated in the comment, the Leighton study recommends that during site development, upon encountering the types of finds stated in the quote from the study, further investigation and analysis may be necessary. The study does not require further investigation at this time.

Section 4.9, Hazards and Hazardous Materials, of the IS/MND, was prepared based on the findings of the Leighton Phase I/II ESA in addition to the *Limited Asbestos Inspection Report* and *Lead-Based Paint/Ceramic Tile Inspection Report*, prepared by Executive Environmental and provided adequate level of detail pursuant to CEQA and CEQA Guidelines. The analysis in Section 4.9 indicated that,

The Phase I ESA did not identify the presence of previous or current hazardous materials or wastes on the site. No underground or aboveground storage tanks were observed, and no stains, corrosion, drains, sumps, pits, or wells are present on the site. The existing school uses are not occupied. Miscellaneous trash, consisting of abandoned school and office supplies and equipment, was observed in the classroom buildings, the administration building, and the cafeteria. Minor amounts of trash were observed on the exterior of the Project site. According to the Phase I ESA, this debris is not considered a recognized environmental condition (REC) associated with the Project site. Commercial and residential uses near the site do not represent a significant environmental concern due to their distances or case status. No evidence of RECs (either historical or controlled) was found on the site, and no additional assessment was recommended. The Project site is not listed as a facility that handled hazardous materials or generated hazardous wastes.

Additionally, as indicated in the comment,

According to the Limited Phase II ESA, the Project site did not detect concentrations of arsenic, lead, or organochlorine pesticides (OCPs) in excess of the U.S. Environmental Protection Agency (USEPA) Residential Regional Screening Levels (RSLs) or Department of Toxic Substance Control Screening Levels (DTSC-SLs).

The analysis identified that due to the age of the structures, asbestos-containing materials (ACM) and lead based paint (LBP) were anticipated to be present. However, the studies concluded that demolition, removal, and disposal of ACM and LBP would comply with existing regulatory requirements, including the Federal and State Occupational Safety and Health Regulations (OSHA and CalOSHA); SCAQMD Regulation X, Subpart M – National Emission Standards For Asbestos and Rule 1403 – Asbestos Emissions (see RR HAZ-2); and California Code of Regulations Title 8, Section 1532.1 – Lead and Section 1529 – Asbestos. With compliance with these regulations, which are reflected in RR HAZ-1 through RR HAZ-3, the impacts would be less than significant.

VC2-2 The comment pertaining to hydrology states that by replacing five acres of penetrable land with impenetrable materials, there will be significant impacts, as runoff from the site will have more contaminants. The comment also says that “with the cars parked in the 355+ spaces provided, contaminants will be directly into the water swale and into the catch basins . . .” The comment is not clear and does not identify where the 355+ spaces are provided. The proposed Project will include a total of 99 surface guest parking spaces in addition to 316 spaces in garages.

Section 4.10, Hydrology and Water Quality, of the IS/MND provided a detailed analysis of potential water quality impacts during construction and operation of the Project and concluded that impacts would be less than significant with compliance with regulations. During operations, the analysis indicates that the Project would generate sediment, trash and debris, oil and grease, bacterial indicators, nutrients, and pesticides that would come from landscaped areas, drive aisles, parking areas, and outdoor residential activities. However, the Project Applicant would be required to prepare and implement a standard urban stormwater mitigation plan (SUSMP) (reflected in RR HYD-2), which would include low impact development, structural and non-structural BMPs and source control BMPs. Compliance with RR HYD-1 and RR HYD-2 would reduce the risk of water degradation from soil erosion and other pollutants, and potential violations of water quality standards would be minimized through required BMPs. Consequently, the Project would not violate water quality standards or waste discharge requirements.

VC2-3 The comment expresses concerns for the nesting birds and identifies nests on existing trees (photographs provided in Appendix III, Nesting Birds). The comment is noted and will be forwarded to the decision makers. Section 4.4, Biological Resources, of the IS/MND provides a detailed discussion of potential impacts pertaining to nesting birds, as related to Threshold (d). Based on the analysis, in light of the presence of trees and vegetation on the site, there is potential for birds protected by the Federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code to nest at the site. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 Code of Federal Regulations [CFR] Section 10.13, as amended). In order to protect the birds, if demolition and site clearing activities occur during the nesting season, a mitigation measure (MM BIO-1) is recommended to avoid impacts to nesting birds and their fledglings. Per MM BIO-1, a pre-construction survey will occur to find out if nests are present. The provisions of MM BIO-1 require that the start of demolition and site preparation would occur outside of the bird nesting and breeding season; if nests are within 200 feet of the impact area, a temporary buffer will be erected; and construction activities will be postponed until juveniles have fledged from the nest. Additionally, a biologist will serve as a construction monitor during those periods

when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

It should also be noted that upon completion of construction and landscaping activities on the site, newly planted trees and landscaping would provide nesting habitat for migratory birds. In light of the above provisions in place, impacts would be less than significant.

- VC2-4 The comment states that removal of trees would be an environmental impact and further identifies the importance of trees and grass in terms of carbon dioxide absorption. The comment is noted and will be forwarded to the decision makers. Section 4.4, Biological Resources (Threshold e), of the IS/MND identifies removal of the said trees in order to accommodate development of the Project. Per the discussion, a permit will be required to remove trees, as oak trees are native to California and are considered heritage trees. Therefore, the Project would be subject to Chapter 26, Article VI, Division 9, Preservation, Protection, and Removal of Trees, of the West Covina Municipal Code. This requirement is reflected in RR BIO-1.

Additionally, the carbon dioxide emissions for the Project were quantified and were found to be under the SCAQMD-recommended threshold of 3,000 MTCO₂e/year, as stated in Section 4.XX, Greenhouse Gas Emissions, of the IS/MND. Also, the Project would plant over 200 trees and provide ample landscaping, which would sequester carbon dioxide.

- VC2-5 The commenter states that the study on the City's website indicates that "the equipment may only temporarily have an impact on the air quality of local residents". Please note, Section 4.3, Air Quality, of the IS/MND provides a detailed analysis of construction and operations air quality for the proposed Project. Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program. CalEEMod is designed to model construction and operational emissions for land development projects. Based on the quantified analysis, none of the criteria pollutants for the estimated maximum daily emissions during construction of the Project exceeded the South Coast Air Quality Management District's (SCAQMD's) daily regional emission thresholds. As shown in Table 4-5 on page 4-19 of the Air Quality section, all criteria pollutants are below the SCAQMD's respective thresholds. Therefore, no significant impacts would result.

Public Utilities & Electric

- VC2-6 The commenter states that there is no study published with the list of commenters, including Southern California Edison (SCE). The comment pertaining to the potential rolling blackout in peak heat season is noted and will be forwarded to the decision makers.

Please note, the *Responses to Comments on the Draft Initial Study/Mitigated Negative Declaration, Walnut Grove Residential Project*, dated February 2021 has been available on the City's website. Section 2.0 of the document includes a table that lists the commenters. The City received a total of eight comments, one comment from Caltrans District 7; one comment from Los Angeles County Sanitation Districts; and six comment letters from individuals. No letter was received from SCE, even though an electronic copy of the IS/MND and a Notice of Intent (NOI) were sent, and they were received by the SCE. Thus, SCE has been made aware of the Project.

Traffic Study Flaws

VC2-7 The comment inquires if Caltrans was notified of this Project. Caltrans is aware of the Project and provided comments, indicating that the Project is unlikely to have a notable impact to their facilities. The Project is expected to generate 1,124 trips per day, not the 12,000 noted in the comment. The proposed resident parking (i.e., 2 spaces per unit) is and 99 parking spaces for the guests are consistent with City standards as well as the Walnut Grove Specific Plan. Existing traffic volumes were taken from 2017 and a growth rate was applied to estimate 2020 volumes, as detailed in the report. Traffic volumes have decreased significantly during the ongoing COVID-19 pandemic, so volumes collected now would not accurately represent non-pandemic conditions.

VC2-8 The comment expresses concern about the number of units and “only one” entrance and exit on Rowland Avenue as well as potential accidents. The comment is noted and will be forwarded to the decision makers. Trip generation is not based on number of occupants, but instead is based on number of units. The Project will have two driveways on East Rowland Avenue, both of which will serve entering and exiting traffic. Approximately 40 total inbound Project trips are expected to be added to the East Rowland Avenue/Azusa Avenue intersection in the peak hour for all approaches combined, which may have a nominal effect on operations. However, the northbound left turn operates as a protected only movement (left turns are only allowed on green arrow, not during southbound through traffic), so there should not be any conflicts between northbound left turn vehicles and southbound right turn vehicles unless a driver is running a red light. If red light running is an issue at the intersection, law enforcement can be notified, and enforcement can be increased at the intersection.

Additionally, it should be recognized that not all units in the proposed development will be three stories. The Project would include construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories.

This comment also expressed concern for potential pedestrian accident. The comment is noted and will be forwarded to the decision makers. If students from the Project site decide to walk to school, they will be able to cross the major roadways (Lark Ellen or Azusa Avenue) to reach their school at a signalized intersection. While additional pedestrians can generally increase the risk of pedestrian-involved crashes, having the opportunity to cross at a signalized intersection is generally considered one of the safest options for pedestrians. It is the responsibility of the pedestrians to be aware of their surroundings and cross when indicated, and it is the responsibility of drivers to yield to pedestrians. If the intersection has a high incidence of drivers running red lights or not yielding to pedestrians, law enforcement presence can be increased to help improve driver behavior.

VC2-9 The comment states that Caltrans recommends traffic calming measures. The comment is noted; however, Caltrans comments do not specifically recommend traffic calming measures; instead, they recommend incorporation of multi-modal and complete streets elements. The Project will include on-site pedestrian and bicycle facilities and on-street parking will be prohibited along the frontage of the Project, providing additional area for cyclists. The comments state support for traffic calming

features, but none is required by the City at this time. However, if speeding is an existing issue, the City can evaluate various approaches to reducing speeds including increased enforcement and/or construction of a road diet (reducing travel lanes to one per direction).

At most, there are expected to be 61 vehicles exiting the property during the AM peak hour (fewer in the PM peak hour), and they will be able to do so from either property access point. The west access will allow left turns directly on to Rowland Avenue. If drivers do choose to make a U-turn at Homerest, the outside through lane will allow other drivers to continue west. Of the 61 exiting vehicles, approximately 60 percent (36 vehicles) are expected to travel towards Azusa Avenue.

VC2-10 Assuming this comment is concerning cut-through traffic through the residential areas between East Rowland Avenue and Puente, the concern is noted and will be forwarded to the decision makers. This issue is beyond the scope of this Project. The commenter can discuss speed calming measures with the City, and the City may evaluate other options to reduce cut-through traffic.

VC2-11 It should also be noted that the increase in traffic is not quantified based the number of cars in each household but rather based on the type of development that is proposed, in this case single- and multi-family residential. Thus, traffic trips commensurate with the type of residential development. The single-family detached units would generate 9.44 daily trips per day, and the multi-family units would generate 5.44 daily trips per unit. These generation rates have been derived from the Institute of Transportation Engineers' (ITE's) *Trip Generation Manual*, 10th Edition, as discussed in Section 4.17, Transportation, of the IS/MND. Using these rates, the proposed Project's daily trip generation is 1,124 trips per day, with approximately 82 AM peak hour trips and 106 PM peak hour trips. In light of this, please note, the Project will not add a total of 12,100 trips per day as indicated in the comment. Pedestrian facilities will be provided on site and will tie into the existing sidewalks along East Rowland Avenue. If school children do move into the area and end up walking to their perspective schools, they will be able to do so by crossing one signalized intersection. Further, if students walk to school (accompanied by parents or alone), that may reduce the total number of trips generated by the site.

Preliminary Hydrology Report Response: Water Run-Off Problems

VC2-12 The comment regarding the findings of drainage and storm runoff is noted and will be forwarded to the decision makers. Please refer to Response LKF-2, above, regarding replacement of "penetrable land" with "impenetrable materials," contributing to runoff.

The comment regarding runoff (photos in Appendix I) and the existing management of runoff being ineffective is noted and will be forwarded to the decision makers. The channel that extends across the northwest and western boundary of the site currently accepts offsite drainage from the commercial center north of the Project. With implementation of the proposed Project, the current flows from offsite will be intercepted at the northern cul-de-sac (North Eileen Street) and re-routed through the Project site through an underground drainage system. Following completion of the drainage improvements at the North Eileen Street cul-de-sac, the road will be repaired to resurface damaged areas associated with the construction effort.

Further, the comment repeats that the replacement of “penetrable land” with “impenetrable materials,” will exacerbates the flooding condition. Please refer to Response LKF-2, above for additional discussion. It should also be noted that the current flooding condition referenced by the commenter and shown on photos in Appendix I is a condition that exists regardless of the proposed Project, and the Applicant bears no responsibility for addressing it.

Too Many Units

VC2-13 The comment regarding market research flaws is noted and will be forwarded to the decision makers. As noted above in Response LKF-9, not all units in the proposed development will be three stories. The Project would include construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories. Additionally, it should be recognized that the three-story multi-family units will be located on the easter portion of the site, along the existing commercial uses and/or surface parking lot, while the two-story single-family units will be located on the western portion and adjacent to existing residential uses.

VC2-14 The comment regarding crime and impact on West Covina Police Department (WCPD) is noted and will be forwarded to the decision makers. The comment regarding the City experiencing an increase in homeless population near the Project leading to property theft crimes is the opinion of the commenter and speculative at best. Additionally, there is no nexus between development of the proposed Project and increase in crimes by the homeless population. The conclusion is drawn based on personal opinion and speculation. No backup documentation, with the exception of the Economic Roundtable reporting, and no substantial evidence is provided. No further response is required.

VC2-15 The comment regarding impact on local schools by the future residents of the proposed Project is noted and will be forwarded to the decision makers. The analysis in the IS/MND acknowledges that the 529 future residents of the development will potentially have school aged children requiring school services from the Covina-Valley Unified School District (C-VUSD). The C-VUSD serves 12,500 students³in eight elementary schools, three middle schools, and four high schools. According to student generation rates for residential land uses within the C-VUSD, the Project may generate 28 elementary school students, 15 middle school students, and 24 high school students, for a total of 66 students.

The Project would pay school development fees to the C-VUSD for the improvement of school facilities that would be needed to serve the Project’s demand for school services and facilities. This requirement is reflected in RR PS-3 in Section 4.15, Public Services, of the IS/MND. As provided under Section 17620 of the *California Education Code* and Section 65970 of the *California Government Code*, the payment of statutory

³ Based on 2013-2014 student enrollment at C-VUSD, last available data from California Department of Education Educational Demographics Unit:
<https://dq.cde.ca.gov/dataquest/Enrollment/EthnicEnr.aspx?cChoice=CoEnrEth2&cYear=2013-14&TheCounty=19,Los%20Angeles&cLevel=County&cTopic=Enrollment&myTimeFrame=S&cType=ALL&cGender=B>

school development fees would fully mitigate a project's impacts on schools. Thus, the impacts would be less than significant.

- VC2-16 The commenter questions the number of proposed units and assumes the Project is a three-story development. Please refer to Response LKF-11, above, for a discussion of the proposed components of the Project.

The comment regarding the City of West Covina being in a dire financial situation is noted and will be forwarded to the decision makers. This is not CEQA issues, and no further response is required.

Three Story Structures' Proximity to Residents

- VC2-17 The comment states that the Project with the proposed height and close proximity is an imposition on the existing residential units, and that such a project should be located near non-residential uses. The comment implies that the proposed Project is a high-rise development. The comment is noted and will be forwarded to the decision makers.

The proposed Project includes construction of a 158-unit attached and detached residential development, which would consist of two different types of residences, including 66 units of detached single-family in a cluster configuration and 92 attached multi-family units. Only the 92 multi-family residential units will be 3 stories, and the single-family units will be 2 stories. A maximum height of three stories is not considered a high-rise development. According to California Building Code (CBC), a *high-rise building* is defined in Chapter 2 as "Every building of any type of construction or occupancy having floors used for human occupancy located more than 75 feet above the lowest floor level having building access . . ." Typically, a 5-story building could be considered a "high-rise" building. Thus, the proposed Project with a maximum height of approximately 40 feet (40'-4") is not considered a high-rise.

The proposed Project provides adequate setback along the northern property line, which interfaces the existing residential units. In fact, the proposed setback is larger than what the zoning requires for the adjacent residential zone. Additionally, the features in place would create buffers between the existing and proposed homes, which would provide and maintain privacy, soften the interface, and promote compatibility.

Regarding backyard pool privacy, it should be noted that the windows on the second story units along the north side of the property have been modified to a height that will make it impractical for the future residents in those units to have downward visibility into the existing adjacent properties. Further, the designated 7.5-foot landscape buffer is intended to be planted with *Podocarpus Gracilior* (or similar) and maintained on a regular basis. The purpose of the buffer is to provide additional privacy. The landscape buffer will not be a maintenance obligation of the individual unit owner. To keep the landscape buffer uniform, the plant material will be maintained by the homeowners association for the Project.

Regarding views, the discussion in Section 4.1, Aesthetics, of the IS/MND provides a detailed analysis of potential visual impacts of the proposed Project. While the proposed Project would alter the existing visual character of the Project site from a school use to a residential development and would change views from the

surrounding public vantage point⁴ (i.e., East Rowland Avenue), this change would not be considered a degradation of the Project site or its surroundings. The new development would replace older structures and increase visual interest and character of the site with quality design and landscaping. The Project would be required to comply with Section 26-547, Specific Plan (S-P) zone, which has requirements for design elements, such as orientation of buildings and uses, building bulk and scale, building height and setback, parking, traffic generation, noise and landscaping (RR AES-1). Therefore, this would ensure that the design of the Project uses would be compatible with the surrounding uses and the General Plan requirements. Additionally, as indicated above, the proposed units adjacent to existing residential uses will be two-story single family units and not three stories.

Transparency

VC2-18 The commenter is hoping for transparency and that there is no relation between the Planning Commissioner Nickolas Lewis and the Applicant. The commenter also asks for a statement ensuring transparently. The comment is noted and will be forwarded to the decision makers. No further response is required.

⁴ Please note, the updated Appendix G of the State CEQA Guidelines (Aesthetics section, Threshold c), considers “public” and not “private” views of the site. The threshold defines public views as, “those that are experienced from publicly accessible vantage point).