

Queen of the Valley Hospital Specific Plan
Final Program Environmental Impact Report
(GPA No. 18-02 and ZC 17-02)
SCH No. 2018101068

City of West Covina

June 2019

Draft EIR Circulated: April 11, 2019
Final EIR Certified: _____

Final Program Environmental Impact Report

Queen of the Valley Hospital Specific Plan Project

**(GPA No. 18-02 and ZC 17-02)
State Clearinghouse Number 2018101068**

Prepared for:
CITY OF WEST COVINA
Community Development Department
1444 W. Garvey Avenue South
West Covina, California 91790
Contact: Jeff Anderson, CDD

June 25, 2019

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SECTION 1.0 INTRODUCTION AND SUMMARY

1.1 INTRODUCTION

The purpose of this document is to present public comments and responses to those comments received on Draft Programmatic Environmental Impact Report (Draft EIR) for the Queen of the Valley Hospital Specific Plan (QVHSP) Project (State Clearinghouse Number 2018101068, GPA 18-02). The City of West Covina is the Lead Agency on the Project.

The Draft EIR was circulated for a 45-day public review and comment beginning on April 14, 2019 and ending on May 28, 2019. During the public review period, the City of West Covina received a total of five written comment letters from State, regional and local agencies, organizations, and individuals on the Draft EIR. Written responses, included in this document, have been prepared to all comments received during the comment period regardless of whether such comments raised significant environmental issues or were general in nature.

During the public review of the Draft EIR, a Community Information Meeting was held on May 14, 2019 at the Queen of the Valley Hospital in the City of West Covina. Some of the comments on the Draft EIR are the result of attendance at the community meeting. These comments are included and addressed in Section 3.0 of this Responses to Comments document.

As required by Section 15132(d) of the California Environmental Quality Act (CEQA) Guidelines, this Final Program EIR responds to comments regarding “significant environmental points raised in the review and consultation process”. This Response to Comments document provides revisions and clarifications to the Draft EIR, as appropriate. In keeping with the requirement of Section 21092.5 of the *California Public Resources Code*, which requires the lead agency to provide a copy of the written response to each public agency that commented on the Draft EIR, the City of West Covina will send copies of the Responses to Comments not only to the public agencies that commented, but also to all parties that commented on the Draft EIR. This will be done at least ten days prior to the City Council certifying the Final EIR.

The Final EIR consists of the following four items: (1) the Draft EIR; (2) the Draft EIR Technical Appendices; (3) Responses to Comments; and (4) Mitigation Monitoring and Reporting Program (MMRP). The Responses to Comments is divided into four sections: Section 1.0, provides the introduction; Section 2.0 provides a list of commenters on the Draft EIR; Section 3.0 provides responses to comments received on the Draft EIR; and Section 4.0 provides clarifications and modifications to the text of the Draft EIR, as appropriate. The changes to the Draft EIR are shown in red underline text and deletions are shown in ~~red strikethrough~~ text.

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SECTION 2.0 LIST OF COMMENTERS

In accordance with the State CEQA Guidelines Section 15132, the following is a list of public agencies, organization, and individuals that submitted comments on the Draft EIR. The comments included letters and e-mail correspondence. Comments have been numbered and are contained in Section 3.0 of these Responses to Comments. Each comment letter is followed by responses to address the comments. The responses are numbered to correspond to the comment letter brackets.

No.	Commenter	Date of Correspondence	Follows Page Number
Written Public Comments			
State Agencies			
1	Governor's Office of Planning and Research (OPR)	May 29, 2019	3-4
2	Caltrans	May 23, 2019	3-6
Regional and Local Agencies			
3	County Sanitation Districts of Los Angeles County	May 28, 2019	3-10
4	Suburban Water Systems	April 15, 2019	3-12
Organizations			
5	Torrey Pines Apartment Homes (Greenberg Glusker)	May 28, 2019	3-16
Individuals			
	None		

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SECTION 3.0 RESPONSES TO COMMENTS

Consistent with Section 15088 of the State CEQA Guidelines, the City's responses to comments received are provided below. The responses are numbered to match the bracketing on the comment letters. Comment letters are categorized by State, regional and local agencies, organizations, and individuals. Within each category, the comment letters and responses to those letters are provided chronologically.

Project Modifications. In response to public comments on the Draft EIR, City staff has recommended that the Queen of the Valley Specific Plan (i.e., the Draft EIR for the proposed Project) be modified to include the following items:

- Require a Conditional Use Permit (CUP) for all development in Zone 3, except for: open space, recreation, office, data center, research, and accessory uses, which would be permitted by right.
- Include tiered setbacks from residential development: 15 feet from the first story, 30 feet from the second story, and 45 feet from three or more stories. Parking structures would have a minimum setback of 70 feet from residential uses.
- Include the existing City Code requirement of a block wall separating commercial and residential uses.
- Include additional design guidelines related to decorative wall requirement along residential development and emphasize that the landscape design adjacent to residential uses will act as a buffer and help protect privacy and incrementally reduce noise.
- Add CalGreen bicycle parking requirement for racks/lockers to be located close to the building they are intended to serve.
- Prohibit walkways in the buffer adjacent to the Torrey Pines Apartment Homes, unless required by OSHA or state/federal ADA requirements.
- Require that all non-construction-related outdoor temporary events will be at least 70 feet from residential uses.
- Include existing City Code requirements related to parking lot landscaping.

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3.1 **STATE**

Two letters were received from the State. The comment letter is listed below.

- Governor’s Office of Planning and Research (OPR) – May 29, 2019
- California Department of Transportation (Caltrans) – May 23, 2019

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Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Letter 1

May 29, 2019

Received

Jeff Anderson
West Covina, City of
1444 West Garvey Avenue South
West Covina, CA 91790

JUN 03 2019

Planning Division

Subject: Queen of the Valley Specific Plan
SCH#: 2018101068

Dear Jeff Anderson:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 5/28/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2018101068/2> . Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

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Letter 1: Governor’s Office of Planning and Research (OPR)

Comment Letter Dated May 29, 2019

- 1-1 The comment letter indicates that one state agency has submitted comments by the close of the review period (Caltrans, see Letter 2), and acknowledges that the City has complied with the State Clearinghouse review requirements for the Draft EIR, pursuant to CEQA. No further response is required. The OPR website listing for this EIR is <https://ceqanet.opr.ca.gov/2018101068/2> and a copy is included in Final EIR Appendix A.

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DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0673
FAX (213) 897-1337
www.dot.ca.gov



Making Conservation
a California Way of Life.

May 23, 2019

Mr. Jeff Anderson
Community Development Director
City of West Covina
1444 W. Garvey Ave. South, 2nd Floor, Room 208
West Covina, CA 91790

RE: Queen of the Valley Specific Plan
Draft Environmental Impact Report (DEIR)
SCH#2018101068
GTS #07-LA-2018-02413
Vic. LA/ 10/ PM 33.399

Dear Mr. Anderson:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above-referenced project. The proposed Queen of the Valley Specific Plan (QVHSP) Project (Project) would govern the future development of the entire 28.8-acre hospital campus. The Project is anticipated to expand up to approximately 1.58 million square feet (plus 490,000 sf) in approximately 5 phases over at least the next 10 years (2019-2028+).

After reviewing the DEIR, Caltrans has the following comments:

The DEIR calls for the use of Congestion Management Program (CMP) to evaluate state facilities. As part of the CMP, Caltrans is responsible for obtaining measures that will off-set Project vehicle trip generation that worsens Caltrans facilities; and MTA's Congestion Management Program, in acknowledging the Caltrans' role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System (2010 CMP, Page D-2). 1

The nearest State facilities are I-10 and I-605. The Project's Traffic Impact Study (TIS) estimated that buildout the Project would generated 9,587 total average daily trips (ADT) with 776/924 total AM/PM peak hour trips. By comparison, existing medical and office uses at the hospital generate approximately 6,899 total ADT with 564/652 AM/PM peak hour trips. The Project's trip distribution indicated that 55% of the trips use the I-10 Freeway (DEIR, Page 4.13-12 to -13). 2

With the above-mentioned trip distribution to I-10 freeway, queuing analysis is recommended to ensure the queue formation at the indicated freeway ramps (Intersection 7, 14, 15) do not create traffic conflicts. Project-generated trips should also be added to the existing and future scenario traffic volumes for the indicated affected ramps. 3

In the Project's TIS Mitigation Measures section (TIS, Page 26-46), significant Project impacts were identified on freeway ramps and indicated that they are under jurisdiction and control of Caltrans. As a 4

result, fair share contribution models were discussed. Please contact Caltrans to discuss the details of the Project's proposed mitigation measure/improvements and fair share contribution involving state facilities. 4 cont.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."

5

Caltrans acknowledges mitigation measure TRA-9 and TRA-10 and encourages the City to continue to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. Such reduction can be accomplished by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

Additionally, the City should continue to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. Considering vehicle demand-reducing strategies, including incentives for commuters to use transit, park-and-ride lots, discounts on monthly bus and rail passes, shuttle buses, vanpools, etc. To the extent that more of the population shifts to transit for some of their inter-regional trips and future cumulative traffic impacts to freeways may be satisfactorily mitigated.

6

Furthermore, Caltrans encourages the use of public transit. Caltrans recommends planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections.

7

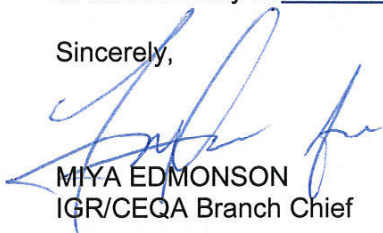
As a reminder, any transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

8

In addition, any work to be performed within the State Right-of-way will need an Encroachment Permit. For information on the Permit process, please contact Caltrans District 7 Office of Permit at (213) 897-3631.

If you have any questions or concerns, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov and refer to GTS#07-LA-2018-02413.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter 2: California Department of Transportation (Caltrans)

Comment Letter Dated May 23, 2019

- 2-1 The comment indicates that Caltrans must be consulted regarding freeway impact locations. The Caltrans facilities, which were evaluated in the Traffic Impact Study (TIS), were selected based on the guidelines in the Caltrans' *Guide for the Preparation of Traffic Impact Studies*.
- 2-2 The comment restated the data in the Draft EIR TIS regarding trip generation and nearest state freeways. The stated information is generally correct although not all 55 percent of the Project trips will necessarily occur on the same segments of the I-10 freeway.
- 2-3 The comment suggests a queuing analysis to assure that Project traffic does not cause freeway congestion near 3 of the I-10 ramps. A queue analysis for all conditions at the three Caltrans ramp intersections has been provided in a memorandum addendum to the TIS (Final EIR Appendix B). As discussed in the memorandum, the off-ramp queues with and without the Project at intersections 7 (I-10 EB Ramps/Dalewood Street) and 15 (West Covina Parkway/I-10 EB Ramps) are expected to be served with the existing storage lengths, and no traffic interaction with the mainline is expected. However, based on the Synchro results, it is expected that the off-ramp queue at intersection 14 (West Covina Parkway/I-10 WB Ramps) may create traffic conflicts with or without the Project, and potentially even under existing conditions. Because the intersection is already assumed to have a significant and unavoidable impact, no additional mitigation measures are needed or recommended to address the potential queuing conflict, and any impacts continue to be considered significant and unavoidable. It is recommended that Caltrans continue to monitor the intersection and off-ramp and provide improvements, as feasible, should the queues create significant conflicts with the mainline traffic. The following information will also be added to Section 4.13, *Transportation/Traffic*, of the Draft EIR as documented in Section 4.0 of the Final EIR:

Freeway Queuing Impacts

In their Draft EIR comment letter, Caltrans suggested a queuing analysis to assure that Project traffic does not cause freeway congestion near 3 of the I-10 ramps. A queue analysis for all conditions at the three Caltrans ramp intersections has been provided in an addendum memorandum to the traffic study (Final EIR Appendix B). As discussed in the new section, the off-ramp queues with and without the Project at intersections 7 (I-10 EB Ramps/Dalewood Street) and 15 (West Covina Parkway/I-10 EB Ramps) are expected to be served with the existing storage lengths, and no traffic interaction with the mainline is expected. However, based on the Synchro results, it is expected that the off-ramp queue at intersection 14 (West Covina Parkway/I-10 WB Ramps) may create traffic conflicts with or without the Project, and potentially even under existing conditions. Because the intersection is already assumed to have a significant and unavoidable impact, no additional mitigation measures are needed or recommended to address the potential queuing conflict, and any impacts continue to be considered significant and unavoidable. It is recommended that Caltrans continue to monitor the intersection and off-ramp and provide improvements as feasible should the queues create significant conflicts with the mainline traffic.

- 2-4 The comment suggests that Caltrans be contacted about fair share contributions for Project-related freeway impacts. As noted, the Project is expected to result in a significant

impact at the intersection of West Covina Parkway and the I-10 WB Ramps. The report recommends restriping the south leg of the intersection (West Covina Parkway). This mitigation would not require any physical reconstruction or any changes on the ramps. However, the City cannot require Caltrans to implement or allow the mitigation measure to be implemented; therefore, the impact at the intersection continues to be considered significant and unavoidable. This conclusion is the same as indicated in the Draft EIR.

- 2-5 The comment acknowledges the proposed mitigation measures TRA-9 and TRA-10 and indicated that Caltrans is interested in reducing regional VMT. The City concurs with Caltrans goal and agrees that reducing VMT and GHG emissions should be a long-term goal for all local jurisdictions.
- 2-6 The comment suggests that the City install Intelligent Transportation System (ITS) improvements, as appropriate. The City will continue to evaluate Transportation Demand Management (TDM) strategies and ITS applications in an effort to better manage the overall transportation network and potentially reduce overall vehicle trips.
- 2-7 The comment indicates that Caltrans encourages the use of public transit and improvements to the system. The City will continue to plan for transit facilities and improvements, as feasible.
- 2-8 The comment states that any Project-related construction that affects freeways, or their rights-of-way, must be coordinated through Caltrans. The appropriate permits will be obtained, as needed.

3.2 REGIONAL AND LOCAL AGENCIES

Two letters were received from regional, county, or local agencies.

- County Sanitation Districts of Los Angeles County – May 28, 2019
- Suburban Water Systems – April 15, 2019

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Letter 3

**COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY**

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

May 28, 2019

Ref. DOC: 5013011

Mr. Jeff Anderson
Community Development Director
City of West Covina
1444 West Garvey Avenue South
2nd Floor, Room 208
West Covina, CA 91790

Received

MAY 30 2019

Planning Division

Dear Mr. Anderson:

DEIR Response for the Queen of the Valley Hospital Specific Plan

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on April 11, 2019. The proposed project is located within the jurisdictional boundaries of District No. 22. Previous comments submitted by the Districts in correspondence dated November 30, 2018 (copy enclosed) still apply to the subject project with the following comments and updated information:

1. Project Description, *page 3-18*, first Sanitary Sewer paragraph – The Districts’ 27-inch Joint Outfall H Unit 8M Trunk Sewer located in Sunset Avenue conveys wastewater from the project site southwest until reaching Merced Avenue, where the trunk sewer curves northwest. Upon reaching Merced Avenue, the diameter of the Joint Outfall H Unit 8M Trunk Sewer increases to 33-inches, and the capacity increases to 17.6 million gallons per day (mgd) to serve the surrounding development. 1

 2. Project Description, *page 3-18*, second Sanitary Sewer paragraph – The information indicates the existing lateral may need to be upsized. Altering a direct connection to a Districts’ trunk sewer requires approval by the Districts. For additional information, please contact the Districts’ Engineering Counter at (562) 908-4288, extension 1205. 2

 3. Utilities and Service Systems, *page 4.15-10*, third Wastewater and Wastewater Treatment paragraph – The San Jose Creek Water Reclamation Plant currently processes an average flow of 58.5 mgd. 3

 4. Utilities and Service Systems, *page 4.15-12*, Sewer paragraph – The Districts’ 27-inch Joint Outfall H Unit 8M Trunk Sewer located in Sunset Avenue conveys wastewater from the project site southwest until reaching Merced Avenue, where the trunk sewer curves northwest. Upon reaching Merced Avenue, the diameter of the Joint Outfall H Unit 8M Trunk Sewer increases to 33-inches and continues to convey wastewater northwest. 4
-

-
5. Utilities and Service Systems, *page 4.15-13*, Impact Analysis – The project is described as adding 200 new beds and 490,000 square feet of building space at the Project Buildout. Please contact the Districts' Industrial Waste Section to determine the expected increase in average wastewater flow from the project. 5
-

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717. 6

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: L. Smith
E. Stewart
A. Schmidt
A. Howard

Letter 3: County Sanitation Districts of Los Angeles County (CSDLAC)

Comment Letter Dated May 28, 2019

- 3-1 The comment indicates the Project is in District No. 22 and suggests some text changes to page 3-18 of the Draft EIR Project Description. The following changes will be made to the Draft EIR and reflected in Section 4.0 of this Final EIR:

Sanitary Sewer (page 3-18)

The campus is within County Sanitation Districts of Los Angeles County (CSDLAC) District No. 22 and is currently serviced by three existing sewer mainlines, which include one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue, serving the area surrounding the QVHSP site, and are operated and maintained by the City of West Covina. The CSDLAC's 27-inch Joint Outfall H Unit 8M Truck Sewer is located in Sunset Avenue which conveys wastewater from the Project site southwest until reaching Merced Avenue where the truck sewer then curves northwest. Upon reaching Merced Avenue, the diameter of the Joint Outfall H Unit 8M Truck Sewer increases to 33 inches and the capacity increases to 17.7 million gallons per day (mgd) to serve the surrounding development.

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

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

- 3-2 The comment suggests some text changes to page 3-18 of the Draft EIR Project Description. These changes will be made to the Draft EIR and reflected in Section 4.0 of this Final EIR (see Response 3-1 above for text changes to Draft EIR page 3-18).
- 3-3 The comment suggests some text changes to page 4.15-10 of Draft EIR Section 4.15, *Utilities and Service Systems*. The following changes will be made to the Draft EIR and reflected in Section 4.0 of this Final EIR:

Wastewater and Wastewater Treatment

(3rd Paragraph) The Project site's wastewater is treated and disposed of at the LACSD's San Jose Creek Water Reclamation Plant (SJCWRP) (LACSD 2018b), located at 1965 Workman Mill Road in unincorporated Los Angeles County, the SJCWRP occupies

approximately 39 acres north of the Pomona Freeway (SR 60) on both sides of the San Gabriel River Freeway (SR 605), located adjacent to the City of Industry. The SJCWRP has a maximum permitted capacity of 100 million gallons of wastewater per day (MGD), serving a large residential population of approximately one million people. Currently, the SJCWRP treats an average flow of ~~63.858.5~~ MGD (LACSD 2018). All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson (LACSD 2018b).

- 3-4 The comment suggests some text changes to page 4.15-12 of Draft EIR Section 4.15, *Utilities and Service Systems*. The following changes will be made to the Draft EIR and reflected in Section 4.0 of this Final EIR:

Sewer

The hospital campus is within County Sanitation Districts of Los Angeles County (CSDLAC) District No. 22 and is currently serviced by three existing sewer mainlines, which include one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue, serving the area surrounding the QVHSP site, and are operated and maintained by the City of West Covina. The CSDLAC's 27-inch Joint Outfall H Unit 8M Truck Sewer is located in Sunset Avenue, which conveys wastewater from the Project site southwest until reaching Merced Avenue where the truck sewer then curves northwest. Upon reaching Merced Avenue, the diameter of the Joint Outfall H Unit 8M Truck Sewer increases to 33 inches and the capacity increases to 17.7 million gallons per day (mgd) to serve the surrounding development.

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

- 3-5 The comment suggests some text changes to page 4.15-13 of Draft EIR Section 4.15, *Utilities and Service Systems*. The following changes will be made to the Draft EIR and reflected in Section 4.0 of this Final EIR:

Impact Analysis (threshold 15.1)

(1st paragraph) Development facilitated by the proposed Project would increase demand for wastewater treatment services, as Project implementation would add 200 new beds and 490,000 square feet of building space at the Project buildout. The Hospital will need to contact the CSDLAC Industrial Waste Section to determine the actual expected increase in average wastewater flow from the Project. The demand for wastewater treatment services would incrementally increase with completion of each of the four phases of the Project.

- 3-6 The comment provides contact information for any other inquiries to the District. The comment information is noted, and the City will contact the District if more information is needed for the Project.



**Suburban
Water Systems**

A SouthWest Water Company

1325 N. Grand Avenue
Suite 100
Covina, CA 91724-4044
Phone 626.543.2500
Fax 626.331.4848
www.swwc.com

April 15, 2019

Mr. Jeff Anderson
Community Development Director
City of West Covina
1444 West Garvey Ave., South
2nd Floor, Room 208
West Covina, CA 91790

**RE: Notice of Availability of a Draft Environmental Impact Report
General Plan Amendment No. 18-02
1115 and 1135 S. Sunset Ave., West Covina
Queen of the Valley Hospital**

Dear Mr. Anderson,

Suburban Water Systems has received and reviewed the Environmental Impact Report (EIR) and has prepared the following response.

Suburban is the water purveyor for the project noted above. Suburban requests submittal of a detailed site plan showing proposed water services.

The Developer will be responsible for all costs associated with upgrading the system to serve this development. The cost to remove the existing facilities is the responsibility of the Developer. The Developer is responsible to coordinate and construct the private waterline(s) from the public water meter to the building and the cost of the backflow prevention assemblies required for the building. Contractors managed by Suburban will construct all installations required for the project from the main pipeline to the point of service.

1

Should you have any questions please contact Laura Sainz at 626-543-2565.

Regards,
SUBURBAN WATER SYSTEMS

Jorge Lopez, P.E.
Vice President, Engineering

cc: SWS File P-748

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Letter 4: Suburban Water Systems

Comment Letter Dated April 15, 2019

- 4-1 The comment confirms Suburban is the water supplier to the Project and the developer (hospital) will be responsible for installing needed connections/improvements to serve the expanded Project uses in the future and the payment of impact fees. The City and Hospital staff are aware of these requirements, which will be met, as needed, during each phase of Project development.

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3.3 **ORGANIZATIONS**

One comment was received from an organization. The comment letter is listed below:

- Torrey Pines Apartment Homes (Greenberg Glusker) – May 28, 2019

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May 28, 2019

By Email Only

City of West Covina
Planning Department
1444 West Garvey Avenue South
West Covina, CA 91790
Attn: Jeff Anderson, Planning Director
janderson@westcovina.org

Re: **Queen of the Valley Hospital Specific Plan/Comments on Draft Program
Environmental Impact Report**

Dear Mr. Anderson:

This letter is submitted on behalf of our client TPA Nasch LLC (“TPA Nasch”), the owner of Torrey Pines Apartment Homes (“Torrey Pines”), the 251-unit residential community located at 851 S. Sunset Avenue. Torrey Pines is home to more than 1,000 City residents.

We appreciate the opportunity to provide written comments in response to the Draft Program Environmental Impact Report (“Draft EIR”) prepared in connection with the Queen of the Valley Hospital Specific Plan project (the “Hospital Expansion Project”). The Hospital Expansion Project proposes the addition of up to approximately 490,000 square feet of new medical buildings and facilities together with two multi-story parking structures and the conversion of the Sunset Field Park property (“Sunset Field”) to a surface parking lot (collectively, the “Hospital Expansion Improvements”). The Hospital Expansion Project would occur in phases over a ten-year period.

1

The Queen of the Valley Hospital Specific Plan No. 1 (the “Specific Plan”) is the guiding planning document for the Hospital Expansion Project and will constitute the zoning for the Queen of the Valley Hospital campus (the “Hospital Campus”). The Specific Plan divides the Hospital Campus into three sectors, Zone 1, designated as Core Medical, Zone 2, designated as Transitional Office, and Zone 3, designated as Transitional Flex. The Specific Plan provides that the highest intensity hospital-related improvements will be sited in Zone 1, the moderate intensity medical office uses will be placed in Zone 2 and that Zone 3 will consist of the lowest intensity parking and supporting services to provide a buffer from the surrounding residential communities, specifically Torrey Pines and the northerly single-family neighborhoods across the Walnut Creek Wash. (Specific Plan at p. 3-2)

The Torrey Pines property directly abuts Zone 3, the Sunset Field property, as well as the easterly boundary of Zone 1, which currently serves as surface parking. According to the proposed development plan (the “Development Plan”) for the planned Hospital Expansion Improvements for the Hospital Expansion Project (the “Planned Improvements”), Sunset Field is to be converted into a 325-space parking lot (the “Surface Lot”) and Zone 1 is slated for the new emergency room and ICU building, the new medical office building and surgery center, the new hospital tower, and one of two new parking structures. These improvements are currently planned for the initial phases of the Hospital Expansion Project.

1 cont.

TPA Nasch is supportive of the Planned Improvements for the Hospital Expansion Project as presented in the proposed Development Plan and values the opportunity to provide our comments concerning the Specific Plan and the Draft EIR so as to identify areas of concern for the Torrey Pines community. The key consideration is to ensure that the Hospital Expansion Project and the provisions of the Specific Plan are compatible with the surrounding residential communities. Torrey Pines directly abuts the Hospital Campus and, consequently, is most vulnerable to any potential impacts of the development and activities proposed for the site.

DRAFT EIR

A. Project Description

The primary concern relating to the Draft EIR is the scope of the project description. An accurate project description is an essential component in assessing whether a proposed project may have a significant effect on the environment. CAL. CODE REGS. TIT. 14 § 15124. “An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” *San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus*, 27 Cal.App.4th 713, 730 (1994) (citations omitted).

The Draft EIR’s analysis of potential environmental impacts utilizes the Development Plan for the Planned Improvements as the basis. (See Draft EIR, Table 3-3, Planned Building Improvements for the QVHSP Project, and the description of Planned Improvements at pages 3-6 through 3-8.)

2

In fact, the Specific Plan is much broader than the Planned Improvements and allows a range of uses and improvements that far exceed the scope and intensity of those presented in the Development Plan. (See Specific Plan Section 5.3 Permitted Uses at pages 5-4 through 5-7 and Section 5.4 Development Standards at pages 5-7 through 5-10.) While the Planned Improvements entail hospital facilities, medical office buildings and ancillary surface and multi-story parking structures, the permitted uses under the Specific Plan (the “Permitted Uses”) extend to hospitality (hotels), community assembly/auditoriums, college and post-graduate educational institutions, general retail, restaurant, on-site alcohol sales, personal services and religious assembly institutions. These uses are not limited to those ancillary to the contemplated

medical facilities, such as on-site pharmacies, child-care, physical rehabilitation or food service/cafeterias.

In particular, as to Zone 3, which is intended to serve as the buffer area between the hospital facilities and the surrounding residences, the Surface Lot on Sunset Field constitutes the extent of the Planned Improvements for purposes of the project description in the Draft EIR. Consequently, the environmental analysis of potential impacts of the Hospital Expansion Project is based on the impacts of the Surface Lot as to Zone 3.

In contrast, the Specific Plan instead authorizes all of the Permitted Uses other than retail, dining establishments and on-site alcohol. In addition, temporary uses and special events are allowed throughout the Hospital Campus, including Zone 3. Specifically, outdoor receptions and festivals as well as farmers markets with hours from 7 a.m. to 9 p.m. are permitted without a temporary use permit. Other outdoor events lasting up to 14 consecutive days and at a rate of 12 events per year as well as modular buildings for a duration of three years with additional three-year extensions are authorized with approval by the Community Development Director. While these uses may be appropriate in Zones 1 and 2, they are not suitable adjacent to the residential uses surrounding Zone 3 or proximate to the portion of Torrey Pines abutting Zone 1.

Similarly, the Development Standards under the Specific Plan provide for a three-story height limit in Zone 3 and a 15-foot setback from the Specific Plan boundary. While these standards are more stringent than those applicable to Zones 1 and 2, they would allow Permitted Uses of significant size to be sited in close proximity to the Torrey Pines residences.

2 cont.

Despite the broad latitude granted under the Specific Plan as to potential future development within Zone 3, the Draft EIR presents only the Surface Lot as the project component within Zone 3 for purposes of the environmental analysis. This is contrary to CEQA, which requires the project description evaluated by an EIR to constitute a reasonable worst-case scenario. This includes the types, distributions and combinations of uses, the build-out capacity, the proximity to existing uses and the sequence, timing and scope of construction. An in-depth and detailed description of the scope and nature of operational activities is also critical, including features such as the hours of operations of various facilities, the timing and the levels of employee, patient, visitor and tenant presence on-site, the volume and access routes for emergency vehicles and peak demand periods for parking and access. The Draft EIR's project description for the Hospital Expansion Project fails to meet these requirements.

In sum, the Draft EIR's project description fails to disclose the full nature and extent of the potential development of the Hospital Campus under the Specific Plan. To fulfill the Draft EIR's function as an adequate environmental review document, the project description must be expanded to reflect the scope of the Specific Plan. In the alternative, the Specific Plan could be revised to be consistent with the Planned Improvements under the Development Plan which are utilized in the Draft EIR as the project description.

B. Environmental Impacts and Mitigation Measures

“The fundamental purpose of an EIR is ‘to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment.’” *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal.4th 412, 428 (2007), citing, CAL. PUB. RES. CODE § 21061. “To that end, the EIR ‘shall include a detailed statement setting forth ... all significant effects on the environment of the proposed project.’” *Id.*, citing CAL. PUB. RES. CODE § 21100(b)(1); *see also* 15126.2(a).

Due to the inadequacy of the project description presented in the Draft EIR, the potential environmental impacts of the scope of development permitted under the Specific Plan are understated.

This is especially severe as to Zone 3, given its proximity to residential uses. The impacts of the Hospital Expansion Project have been assessed assuming that Zone 3 will be utilized solely for the Surface Lot, despite the wide array of intensive Permitted Uses and improvements that could be sited there under the Specific Plan. In addition, unlike Zones 1 and 2, which have existing conditions characterized by active hospital uses and activities, Sunset Field is a dormant open space use. Therefore, the baseline for CEQA purposes is demonstrably different. As a consequence, potential construction and operational impacts affecting nearby residences, including as to air quality, noise, aesthetics, lighting, land use, parking, traffic and circulation, have not been adequately presented and assessed.

3

This understatement of potential impacts extends to the whole of the Hospital Expansion Project, including Zones 1 and 2, to the extent that the Planned Improvements under the Development Plan presented as the project description do not reflect the level of potential development scope and intensity authorized under the Specific Plan. Again, CEQA requires the evaluation of “worst-case” scenarios, include as to build-out capacity, combinations and distributions of various uses, sequencing, duration and timing of construction and the nature and scope of operational activities.

As to Zone 3, the Draft EIR presents a single acknowledgement to the distinctive issues related to future development of Sunset Field. Specifically, the evaluation of land use and planning impacts presents as a means of mitigation Mitigation Measure LUP-1 (Draft EIR, page 4.9-9), which provides that, except for surface parking, any improved uses placed adjacent to residential uses shall be designed to minimize impacts related to views, lighting and noise on local residents. This includes 30-days prior notice to Torrey Pines residents of public hearings for any buildings in Zones 1 or 3 adjacent to such residences.

4

This mitigation measure lacks the specificity and enforceability to assure that any and all impacts are fully disclosed and fully mitigated. It essentially relies on a hearing notice to residents rather than providing clear and ascertainable standards for mitigation. By definition, it improperly defers both the assessment of the impacts and the scope and nature of the mitigation.

4 cont.

Now is the time to assess and evaluate the full scope of the potential worst-case scenarios as to the Permitted Uses under the Specific Plan rather than the Surface Lot component of the Planned Improvements presented in the Draft EIR.

C. Alternatives

In view of the failure to present and evaluate the potential impacts of an accurate and comprehensive project description, the project alternatives presented in the Draft EIR may not be adequate. This will not be known until such assessment has been completed.

5

SPECIFIC PLAN

This section of the letter will address our comments on the Specific Plan. They relate primarily to the provisions as they related to Zone 3 and the portion of Zone 1 abutting Torrey Pines. As previously noted, Zone 3 is distinct and distinguishable from the remainder of the Hospital Campus due to the proximately of residential uses as well as the low intensity prior park use and the extended vacancy of the property since the termination of the park use.

A. Surface Lot Use

6

The Surface Lot constitutes the Planned Improvements for Zone 3. That would be acceptable provided the Surface Lot is subject to adequate development standards and requirements to assure that the Surface Lot and the activities on the Surface Lot are fully buffered from the adjacent residences.

B. Surface Parking Lot Design Standards

Section 5.5.2 of the Specific Plan addresses design standards for surface parking lots that would apply to the Surface Lot. As to surface parking lots, the 15-foot setback from residential uses is reduced to a ten-foot landscaped area that can include curbs, walls, walkways, bikeways and drive approaches. When proximate to residential areas, that setback should be increased to the 15-foot minimum and should disallow walkways, bikeways and drive approaches along the Specific Plan boundary adjacent to Torrey Pines due to the noise and disturbance attributable to such activities. This is especially crucial given the around-the-clock nature of the hospital operations, include late night and early morning shift changes, that could cause disturbances during sleeping hours. It is likely, given its remote location from the core hospital facilities, that the Surface Lot would be used by hospital employees and staff.

7

In addition, the minimum 5-foot landscaped areas between the Specific Plan boundary and walls should be increased to ten feet. Similarly, the minimum 10-foot setback from surface parking lots to buildings should be required to be landscaped and increased to fifteen feet. 8

C. Lighting, Solar Panels, Bike Storage

The Secondary Development Standards in Section 5.4.2 of the Specific Plan address lighting, solar panels and bike storage. They require all new parking lots and other security lighting to be directed away from surrounding land uses and toward the specific location to be illuminated. The standards should incorporate specific requirements as to lighting for the Surface Lot and any proximate surface lot in Zone 1 to assure that light spill does not extend beyond the boundaries of the Specific Plan and is fully shielded from all nearby residences. 9

Light fixtures within surface parking areas adjacent to residential areas are not to exceed 20 feet in height. That maximum height should be reduced to the extent necessary to assure that light spill does not extend beyond the boundaries of the Specific Plan adjacent to residential areas, including as to the Surface Lot and Zone 1.

Solar canopies are permitted in parking areas subject to Administrative Review by the Planning Director. A restriction should be added to assure that solar panels are not sited so as to adversely affect adjacent residential areas and shall be set back at least twenty feet from the Specific Plan boundaries adjacent to residential areas. 10

No bike storage areas or vehicle charging stations should be allowed within twenty feet of the Specific Plan boundaries adjacent to residential areas. 11

D. Fences and Walls

The Secondary Development Standards (on page 5-15) appear to allow walls up to eight feet in height within the Hospital Campus. As to Specific Plan boundaries adjacent to residential areas, such walls should be attractively designed, of masonry construction, and limited to six feet in height with a minimum setback of ten feet and required to be fully landscaped. 12

The Secondary Development Standards (at page 5-15) require all ground-level trash, storage, loading, service, maintenance and mechanical and electrical equipment areas in public view to be screened by solid masonry walls or decorative fences. Solid masonry walls should be required along the perimeter of the Hospital Campus adjacent to all residential areas and should be required to fully screen all such ground-level facilities and equipment. In addition, trash, storage, loading service, maintenance and mechanical and electrical equipment areas should be set back a minimum of twenty feet from all residential area boundaries. 13

E. Parking Structures

The Planned Improvements place two multi-story parking structures in Zones 1 and 2 with the Surface Lot in Zone 3. As previously noted, the Draft EIR does not evaluate the impacts of the placement of any other types of development or uses within Zone 3. Provided that the Draft EIR is revised to assess the impacts of a parking structure within Zone 3, the Specific Plan standards should be revised to specify design requirements and setbacks that fully protect adjacent residential uses.

14

In particular, any parking structure along the Specific Plan boundary adjacent to any residential area should be set back a minimum of twenty-five feet. In addition, the parking structure design standards should require a landscaping buffer or other screening. The height of any such parking structure should be limited to twenty feet and use of the roof for parking should be prohibited so that all such adjacent parking structures are fully enclosed.

F. Improvements Other Than Parking

As previously noted, the Specific Plan allows a wide range of Permitted Uses within Zone 3 other than the Surface Lot or a parking structure. The Specific Plan should be revised to prohibit any uses other than parking unless and until a Specific Plan amendment is approved after the completion of environmental review in compliance with CEQA.

Given the remote location of the Sunset Field, its proximity to residential neighborhoods and its prior history as an open space recreational use, it is not suitable for the types of structures, improvements and uses allowed under the Specific Plan. In addition, the extensive size of the Hospital Campus provides ample area for the siting of buildings and structures elsewhere. Moreover, the Planned Improvements contemplated by the Development Plan accommodate a 50 percent increase in the square footage of medical-related improvements within the existing areas devoted to hospital uses in an orderly fashion without an incursion into the residential perimeters, including Zone 3.

15

From a planning perspective, Zones 1 and 2 are the suitable locations for all such uses and improvements. Zone 3 should be limited to parking, provided that it is adequately buffered from residential neighborhoods. Zone 3 in particular is remote from the core medical facilities and does not lend itself to efficient circulation or connection to the remainder of the Hospital Campus.

G. Temporary Uses

The Specific Plan allows a variety of high-intensity temporary uses, including outdoor activities, throughout the Hospital Campus. Such uses have minimal, and in many case no, permitting requirements and involve large groups congregating outdoors from 7 a.m. to 9 p.m. These include events with no population limitations.

16

Such uses are incompatible with adjacent residential areas and should be prohibited in Zone 3 and elsewhere within fifty feet of the Specific Plan boundary.

16 cont.

In closing, it is imperative that the Hospital Expansion Project is conceived and designed so as to protect and buffer the adjacent residential neighborhoods. As noted, the Torrey Pines community is the closest in proximity and is most directly impacted by the proposed substantial expansion of the institutional uses and improvements. Of the utmost importance is identifying effective means to buffer the Torrey Pines and other residences from the intensification and expansion of the around-the-clock hospital and medical activities as well as the accompanying lengthy demolition and construction process. Revising the provisions of the Specific Plan to assure the compatibility of the Hospital Expansion Project with surrounding residential uses is crucial.

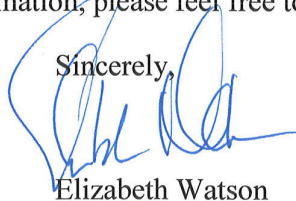
TPA Nasch supports the Planned Improvements under the Development Plan provided they are buffered from the nearby residences. The concern is that the Specific Plan authorizes a wide array of uses and improvements beyond the medical uses and Planned Improvements reflected in the Development Plan evaluated in the Draft EIR.

17

Most critically, Zone 3 and the portion of Zone 1 abutting Torrey Pines are not subject to adequate limitations from a planning perspective. Under the Specific Plan, Zone 3, designated as Transitional Flex, could be developed with structures and uses incompatible with the established surrounding residential uses. Instead Zone 3 should be designated for parking and, principally, the Surface Lot, as contemplated by the Development Plan. Again, the ample size and configuration of the Hospital Campus can fully accommodate any other contemplated improvements within Zones 1 and 2.

We appreciate your consideration of TPA Nasch's comments. Should you have any questions or require any further information, please feel free to contact us.

Sincerely,



Elizabeth Watson

cc: Ronald Nasch

Letter 5: Torrey Pines Apartment Homes (Greenberg Glusker)

Comment Letter Dated May 28, 2019

- 5-1 The comment summarizes the Project characteristics and expresses concern about impacts to the neighboring Torrey Pines Apartment Homes (Torrey Pines). The City acknowledges the Torrey Pines residents and owner have a vested interest in the construction and operational aspects of the proposed hospital expansion project. As an introduction to the responses to this comment letter, the reader should note that the City has proposed a number of changes to the Queen of the Valley Specific Plan, especially to Zone 3 adjacent to the Torrey Pines Apartment Homes, that will provide additional protection for Torrey Pines residents by limiting future activities within Zone 3. These are elaborated below, in Responses 5-2 through 5-16.

Global Comment/Response. It is important to note that the EIR is a programmatic document because there is no specific information available on a number of design parameters, including, but not limited to, trash enclosures and outdoor equipment. The specific location, design, size, appearance, and other characteristics of future improvements will be evaluated when specific development is proposed. At that time, adjacent residents would be notified about the proposed development and their input into the design, appearance, and other project components would be solicited at that time. This response applies to all of the design-specific comments (Responses 5-2 through 5-16)

- 5-2 The comment expressed concern about the accuracy of the Draft EIR Project Description. The analysis of environmental issues in the Draft EIR (Sections 4.1 through 4.15) assumed that the list of possible ancillary uses outlined in Section 3.6 of the Draft EIR Project Description could be built where allowed under the QVHSP, including Zone 3. Table 3-6, *Permitted Uses*, and Table 3-7, *Conditional Uses*, and Section 3.6.2, *Permitted Temporary Uses and Special Events*, clearly outline the potential extent of uses that could be developed within the QVHSP property, mainly in Zones 2 and 3, since Zone 1 focuses on hospital buildings. However, the setbacks and buffering improvements, outlined in the QVHSP, were also assumed in the Draft EIR analyses. The Draft EIR made it clear that the Project was the Hospital development plan (Phases 1A, 1B, 2, and Long-Range Improvements) in addition to the allowable uses, as long as the total square footage of the Project did not exceed that identified and evaluated in the Draft EIR. It should be noted that a number of changes to the Queen of the Valley Specific Plan, especially to Zone 3 adjacent to the Torrey Pines Apartment Homes, are proposed that will provide additional protection for Torrey Pines residents by limiting future activities within Zone 3. Furthermore, all future developments that increase square footage will require a Precise Plan, per the established procedures of the City's Zoning Code. Finding 'C' required under a Precise Plan will require the approving body to make a finding that, "Granting the permit would not be detrimental to the public interest, health, safety, and welfare and would not unreasonably interfere with the use or enjoyment of property in the vicinity of the subject property" (Section 26-229, paragraph c).
- 5-3 The comment expresses concern about Zone 3 impacts to Torrey Pines and mitigation in general. As noted in Response 5-2, above, a number of changes to the Queen of the Valley Specific Plan, especially to Zone 3 adjacent to the Torrey Pines Apartment Homes, which will provide additional protection for Torrey Pines residents by limiting future activities within Zone 3. Furthermore, setbacks have been increased for buildings in excess of one story in height.

5-4 The comment expresses concern about Zone 3 impacts to Torrey Pines Apartment Homes and Mitigation Measure LUP-1. First, it should be remembered the EIR is a programmatic document and the specific location, design, size, appearance, and other characteristics of future improvements will be evaluated when specific development is proposed as part of the future Precise Plan application that will be required. In light of this, the language of LUP-1 is general, as it sets overall performance characteristics and limitations for future improvements, as well as specific noticing requirements for the Torrey Pines Apartment Homes, as outlined below and as modified by City staff to reflect Municipal Code requirements:

LUP-1 Except for surface parking, any improved uses placed adjacent to the residential uses to the northeast of the QVHSP property, including the former Sunset Field site, shall be located and designed to minimize impacts related to views, lighting, and noise on local residents. ~~Consistent with. In addition to~~ the required noticing for precise plans per the Municipal Code, property owners and residents living northeast of the site (i.e., Torrey Pines Apartment Homes) shall be notified of a public hearing ~~at least 30 days prior to the hearing~~ for any buildings in the portions of Specific Plan Zones 1 or 3, adjacent to these residences. This process is ~~consistent with in addition to~~ the Municipal Code’s requirement to hold a public hearing for new buildings and to notify owners and residents within 300 feet of the proposed building of the public hearing. This measure shall be implemented to the satisfaction of the City Community Development Director.

5-5 The comment questions the adequacy of the alternatives analyzed in the Draft EIR in light of an “inaccurate” Project Description. The City considers the Project Description and the environmental analyses in Section 4.0 of the Draft EIR to be accurate and correctly reflecting the proposed QVHSP and related improvements within the Project site. It should also be noted that the Draft EIR complies with Section 15126.6 of the State CEQA Guidelines by including a reasonable range of alternatives. In this case, the EIR examined two No Project Alternatives (No Development and Existing General Plan and Zoning”) as well as a “Reduced Intensity (50 percent) Alternative and a “Senior Care” Alternative. As explained in DEIR Section 5.5, other potential alternative plans were considered but ultimately rejected such as various mixed uses and alternative sites (e.g., the Hospital does not own property elsewhere in the City and could not relocate). Each of the alternatives has been designed to minimize, to different degrees, the potentially significant impacts associated with the Project; therefore, they achieved the stated purpose, as specified in Section 15126.6(b), of having alternatives “which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives”. Therefore, the alternatives analysis does not need to be revised or expanded to address additional information or scenarios.

5-6 The comment focuses on QVHSP Zone 3 of the Specific Plan and buffering of surface parking. Response 5-2 above addresses the issue of future planning for Zone 3, including surface parking and other possible developed uses that would be governed by the setback and buffering requirements of the QVHSP. It should be noted that there are no regulations in the existing Specific Plan pertaining to surface parking lot setbacks to adjacent properties. Furthermore, the existing City of West Covina Municipal Code in Section 26-572, paragraph g only requires a six (6)-foot landscape buffer between non-residential and residential development. The proposed Specific Plan requires a ten (10)-foot landscape buffer between the campus and adjacent residential and open spaces uses.

5-7 The comment addresses QVHSP Zone 3 parking lot setbacks and buffering. As noted in Response 5-1, above, the QVHSP will be modified to add the following items:

- Include tiered setbacks from residential of 15 feet from the first story, 30 feet from the second story, and 45 feet from three or more stories. Parking structures would have a minimum setback of 70 feet from residential uses.
- Include the existing City Code requirement of a block wall separating commercial and residential uses.
- Do not allow walkways in the buffer adjacent to the Torrey Pines Apartment Homes unless required by OSHA or state/federal ADA requirements.

These changes to the Specific Plan and the Draft EIR Project Description are memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, *Section 3.0, Project Description*.

5-8 The comment addresses the QVHSP Zone 3 parking lot landscape setback. As noted in Response 5-1, above, the QVHSP will be modified to add the following items:

- Include additional design guidelines related to decorative wall requirement along residential development and emphasize that the landscape design adjacent to residential uses will act as a buffer and help protect privacy and incrementally reduce noise.
- Include existing City Code requirements related to parking lot landscaping.

These changes to the Specific Plan and the Draft EIR Project Description are memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, *Section 3.0, Project Description*.

5-9 The comment asks for more design specificity for lighting. The EIR is a programmatic document, because there is no specific information available at this time on a number of design parameters such as lighting. The specific location, design, size, appearance, and other characteristics of future improvements will be evaluated when specific development is proposed. It should be noted that all future developments would be required to comply with Section 26-570 of the WCMC, requiring that all lighting shall be hooded or directed away from adjoining properties.

5-10 The comment asks for more design specificity for solar panels. The EIR is a programmatic document, because there is no specific information available at this time on a number of design parameters such as solar panels. The specific location, design, size, appearance, and other characteristics of future improvements will be evaluated when specific development is proposed.

5-11 The comment asks for more design specificity for bicycle storage. As noted in Response 5-1, above, the QVHSP will be modified to add the following item:

- Add CalGreen bicycle parking requirement for racks/lockers to be located close to the building they are intended to serve.

This change to the Specific Plan and the Draft EIR Project Description is memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, *Section 3.0, Project Description*.

5-12 The comment expresses concern about the design of new walls. As noted in Response 5-1, above, the QVHSP will be modified to add the following two items:

- Include the existing City Code regulation of a block wall separating commercial and residential uses.
- Include additional design guidelines related to decorative wall requirement along residential development and emphasize that the landscape design adjacent to residential uses will act as a buffer and help protect privacy and incrementally reduce noise.

These changes to the Specific Plan and the Draft EIR Project Description are memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, *Section 3.0, Project Description*.

5-13 The comment expresses concern about the design of trash enclosures and outdoor equipment. It is important to note that the EIR is a programmatic document, because there is no specific information available on a number of design parameters such as trash enclosures and outdoor equipment. The specific location, design, size, appearance, and other characteristics of future improvements will be evaluated as part of a Precise Plan when specific development is proposed. At that time, adjacent residents would be notified about the proposed development and their input into the design, appearance, and other project characteristics would be solicited.

5-14 The comment expresses concern about the design of parking structures. As noted in Response 5-1, above, the QVHSP will be modified to add the following items:

- Include tiered setbacks from residential of 15 feet from the first story, 30 feet from the second story, and 45 feet from three or more stories. Parking structures would have a minimum setback of 70 feet from residential uses.

These changes to the Specific Plan and the Draft EIR Project Description are memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, *Section 3.0, Project Description*. In addition, a parking structure is not a “use” and is not included in a Conditional Use Permit, but it would still require a Precise Plan of Design.

4-15 The comment expresses concern about permitted uses within the QVHSP. As noted in Response 5-1, above, the QVHSP will be modified to add the following item:

- Require a Conditional Use Permit (CUP) for all development in Zone 3, except for: open space, recreation, office, data center, research, and accessory uses, which would be permitted by right.

This change to the Specific Plan and the Draft EIR Project Description is memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, *Section 3.0, Project Description*.

4-16 The comment expresses concern about temporary uses within the QVHSP. As noted in Response 5-1, above, the QVHSP will be modified to add the following item:

- Require that all non-construction-related outdoor temporary events will be at least 70 feet from residential uses.

This change to the Specific Plan and the Draft EIR Project Description is memorialized in Section 4.0, *Clarifications and Revisions to the Draft EIR*, Sub-Section 4.1.2, Section 3.0, *Project Description*.

- 4-17 The comment summarizes the concerns regarding potential impacts of the QVHSP on Torrey Pines residents and owner. The commenter's many issues and concerns are addressed in Responses 5-2 through 5-16, above.

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SECTION 4.0 CLARIFICATIONS AND REVISIONS TO THE DRAFT EIR

Some of the revisions included herein are based on input received from the commenters during the public review period, and some are City-identified changes. None of these clarifications and revisions reflect a substantial change to the Project, nor do they result in a new impact or intensification of an impact already identified in the Draft EIR. Additions to the Draft EIR are shown in red underline text and deletions are shown in ~~red strikethrough~~ text.

4.1 CLARIFICATIONS AND REVISIONS TO THE DRAFT EIR

4.1.1 SECTION 3.0, PROJECT DESCRIPTION

GLOBAL: The City has made the following clarifications/modifications to the Queen of the Valley Specific Plan Draft EIR Project Description to address concerns expressed by the Torrey Pines Apartment Homes in a Draft EIR comment letter submitted on May 28, 2019:

- Require a Conditional Use Permit (CUP) for all development in Zone 3, except for: open space, recreation, office, data center, research, and accessory uses, which would be permitted by right.
- Include tiered building setbacks from residential development: 15 feet from the first story, 30 feet for the second story, and 45 feet for three or more stories. Parking structures would have a minimum setback of 70 feet from residential uses.
- Include the existing City Code requirement of a block wall separating commercial and residential uses.
- Include additional design guidelines related to decorative wall requirement along residential development and emphasize that the landscape design adjacent to residential uses will act as a buffer and help protect privacy and incrementally reduce noise.
- Add CalGreen bicycle parking requirement for racks/lockers to be located close to the building they are intended to serve.
- Prohibit walkways in the buffer adjacent to the Torrey Pines Apartment Homes unless required by OSHA or state/federal ADA requirements.
- Require that all non-construction-related outdoor temporary events will be at least 70 feet from residential uses.
- Include existing City Code requirements related to parking lot landscaping.

The County Sanitation Districts of Los Angeles County requested the following clarifications to Sub-Section 3.6.4, Utilities (Section 3.0 Project Description), regarding water and wastewater treatment facilities serving the Project site and surrounding area:

Sanitary Sewer (page 3-18)

The campus is within County Sanitation Districts of Los Angeles County (CSDLAC) District No. 22 and is currently serviced by three existing sewer mainlines, which include one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue, serving the area surrounding the QVHSP site, and are operated and maintained by the City of West Covina. The CSDLAC's 27-inch Joint Outfall H Unit 8M Truck Sewer is located in Sunset Avenue which conveys wastewater from the Project site southwest until reaching Merced Avenue where the truck sewer then curves northwest. Upon reaching Merced Avenue, the diameter of the Joint

Outfall H Unit 8M Truck Sewer increases to 33 inches and the capacity increases to 17.7 million gallons per day (mgd) to serve the surrounding development.

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

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

4.1.2 SECTION 4.9, LAND USE AND PLANNING

4.9.5 Environmental Impacts (page 4.9-9)

The following modifications were made to make Mitigation Measure LUP-1 completely consistent with the City Municipal Code noticing requirements:

Mitigation Measures

LUP-1 Except for surface parking, any improved uses placed adjacent to the residential uses to the northeast of the QVHSP property, including the former Sunset Field site, shall be located and designed to minimize impacts related to views, lighting, and noise on local residents. Consistent with ~~In addition to~~ the required noticing for precise plans per the Municipal Code, property owners and residents living northeast of the site (i.e., Torrey Pines Apartment Homes) shall be notified of a public hearing at least 30 days prior to the hearing for any buildings in the portions of Specific Plan Zones 1 or 3, adjacent to these residences. This process is consistent with ~~in addition to~~ the Municipal Code's requirement to hold a public hearing for new buildings and to notify owners and residents within 300 feet of the proposed building of the public hearing. This measure shall be implemented to the satisfaction of the City Community Development Director.

4.1.3 SECTION 4.15, UTILITIES AND SERVICE SYSTEMS

The County Sanitation Districts of Los Angeles County requested the following clarifications to the description of water and wastewater treatment facilities serving the Project site and the surrounding area:

4.15.2 Existing Setting (page 4.15-10)

Wastewater and Wastewater Treatment

(3rd Paragraph) The Project site's wastewater is treated and disposed of at the LACSD's San Jose Creek Water Reclamation Plant (SJCWRP) (LACSD 2018b), located at 1965 Workman Mill Road in unincorporated Los Angeles County, the SJCWRP occupies approximately 39 acres north of the Pomona Freeway (SR 60) on both sides of the San Gabriel River Freeway (SR 605), located adjacent to the City of Industry. The SJCWRP has a maximum permitted capacity of 100 million gallons of wastewater per day (MGD), serving a large residential population of approximately one million people. Currently, the SJCWRP treats an average flow of ~~63.858.5~~ MGD (LACSD 2018). All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson (LACSD 2018b).

4.15.2 Existing Setting (page 4.15-12)

Sewer

The hospital campus is within County Sanitation Districts of Los Angeles County (CSDLAC) District No. 22 and is currently serviced by three existing sewer mainlines, ~~which include one 27-inch sewer main line in Sunset Avenue and one 33-inch sewer mainline in Merced Avenue, serving the area surrounding the QVHSP site, and are operated and maintained by the City of West Covina. The CSDLAC's 27-inch Joint Outfall H Unit 8M Truck Sewer is located in Sunset Avenue, which conveys wastewater from the Project site southwest until reaching Merced Avenue where the truck sewer then curves northwest. Upon reaching Merced Avenue, the diameter of the Joint Outfall H Unit 8M Truck Sewer increases to 33 inches and the capacity increases to 17.7 million gallons per day (mgd) to serve the surrounding development.~~

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

4.15.4 Environmental Impacts (page 4.15-13)

Impact Analysis (Threshold 15.1)

(1st paragraph) Development facilitated by the proposed Project would increase demand for wastewater treatment services, as Project implementation would add 200 new beds and 490,000 square feet of building space at the Project buildout. The Hospital will need to contact the CSDLAC Industrial Waste Section to determine the actual expected increase in average

wastewater flow from the Project. The demand for wastewater treatment services would incrementally increase with completion of each of the four phases of the Project.

4.1.4 SECTION 4.13, TRANSPORTATION/TRAFFIC

The following text on freeway queuing impacts was added to the traffic impact analysis in the DEIR as a result of comments by Caltrans (Letter 2):

4.13.5 Environmental Impacts (page 4.13-16)

Caltrans Study Segments

In addition to the study intersections, the seven Caltrans study segments were evaluated for existing conditions. As shown in Table 4.13-7, all segments are shown to operate at LOS D or better. Therefore, impacts are less than significant, and no mitigation is required.

**TABLE 4.1-1
 EXISTING PLUS PROJECT IMPACTS (2018) – CALTRANS SEGMENTS**

I-10 Freeway Caltrans Segment	Peak Hour Volumes (passenger cars/ hour/lane)		Level of Service (LOS)	
	Existing	Existing Plus Project	Existing	Existing Plus Project
Between I-605 & Bess Ave/Frazier St	1,236	1,243	C	C
Between Bess Ave/Frazier St & Baldwin Park Blvd	1,210	1,233	C	C
Between Baldwin Park Blvd & Francisquito Ave	1,165	1,193	B	C
Between Francisquito Ave & Puente Ave	1,575	1,616	C	C
Between Puente Ave & Pacific Ave/W. Covina Pkwy	1,602	1,636	C	C
I-10 between Pacific Ave/W. Covina Pkwy & Vincent Ave	1,722	1,745	D	D
Between Vincent Ave & Azusa Ave	1,862	1,875	D	D

Source: Table 6, *Traffic Impact Study*, Psomas 2018.

Freeway Queuing Impacts

In their Draft EIR comment letter, Caltrans suggested a queuing analysis to assure that Project traffic does not cause freeway congestion near 3 of the I-10 ramps. A queue analysis for all conditions at the three Caltrans ramp intersections has been provided in an addendum memorandum to the traffic study (Final EIR Appendix B). As discussed in the new section, the off-ramp queues with and without the Project at intersections 7 (I-10 EB Ramps/Dalewood Street) and 15 (West Covina Parkway/I-10 EB Ramps) are expected to be served with the existing storage lengths, and no traffic interaction with the mainline is expected. However, based on the Synchro results, it is expected that the off-ramp queue at intersection 14 (West Covina Parkway/I-10 WB Ramps) may create traffic conflicts with or without the Project, and potentially even under existing conditions. Because the intersection is already assumed to have a significant and unavoidable impact, no additional mitigation measures are needed or recommended to address the potential queuing conflict, and any impacts continue to be considered significant and unavoidable. It is recommended that Caltrans continue to monitor the intersection and off-ramp and provide improvements as feasible should the queues create significant conflicts with the mainline traffic.

Scenario 2: Completion of Phase 1 (2022)

Local Intersections

The next analysis scenario is for conditions after the completion of Phase 1 improvements by approximately 2022. Table 4.13-8 indicates there would be significant traffic impacts at four intersections after completion of Phase 1. As mentioned under Scenario 1 above, the highest lane delay, which occurs on the Toluca Avenue southwest shared through-left lane, is for the Cameron Avenue/Toluca Avenue intersection, as shown in Table 4.13-8. Although the highest lane delay represents a LOS F, a traffic signal is not recommended since the low left-turn volumes from Toluca Avenue would not warrant a traffic signal. Left turning vehicles from Toluca Avenue could also take alternative routes to avoid delays at the intersection during the peak hours.

4.2 REVISIONS TO THE EXHIBITS

Based on the comments and response to comments, no changes to any of the Draft EIR exhibits are required.

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