

Appendix J

Responses to Comments on the Draft IS-MND

Responses to Comments on the Draft IS-MND

This section includes comments received during public circulation of the Draft Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the Cameron II Project (project).

The Draft IS-MND was circulated for a 30-day public review period that began on May 19, 2021 and ended on June 8, 2021. The City received three comment letters on the Draft IS-MND. The comment letters are included herein, along with responses to the environmental concerns raised by the commenters. The commenters and the page number on which each commenter's letter appear are listed below.

Letter Number and Commenter	Page Number
1 Adriana Raza, Los Angeles County Sanitation Districts	2
2 The Diaz Family	5
3 Thomas Jewik	10

The comment letters and responses follow. The comment letters are numbered sequentially, and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft IS-MND text, a notation is made in the response indicating that the text is revised. Changes in text are signified by ~~strikeout font~~ where text was removed and by underlined font where text was added. These changes in text are noted in the Final IS-MND.



June 8, 2021

Ref. DOC 6190825

Ms. Jo-Anne Burns, Planning Manager
Planning Department
City of West Covina
1444 West Garvey Avenue, Suite 317
West Covina, CA 91790

Letter 1

Dear Ms. Burns:

NOI Response for Cameron II Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on May 24, 2021. The proposed project is located within the jurisdictional boundary of District No. 22. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall H Unit 8M Trunk Sewer, located in Orange Avenue south of Merced Avenue. The Districts' 30-inch diameter trunk sewer has a capacity of 19.1 million gallons per day (mgd) and conveyed a peak flow of 10.3 mgd when last measured in 2015.
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 259.6 mgd.
3. The expected increase in average wastewater flow from the project site, described in the notice as 84-unit townhome development, is 9,549 gallons per day, after the structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

1.1

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

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If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacs.org.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Letter 1

COMMENTER: Adriana Raza, Los Angeles County Sanitation Districts (LACSD)

DATE: June 8, 2021

Response 1.1

The commenter (LACSD) confirms that the project site is within their service area; provides information regarding the local and regional sewer lines and wastewater treatment facilities serving the project site; the expected increase in average wastewater flow from the proposed project; and fees that the LACSD can charge to help upgrade or expand the sewer system.

These comments are informational and do not directly comment on the contents of IS-MND or the CEQA process. However, to reflect the information regarding expected average wastewater flow from the proposed project, the following language has been added to page 126 of the Final IS-MND:

According to a letter from the LACSD dated June 8, 2021 (see Appendix J), the expected increase in average wastewater flow from the proposed project is 9,549 gallons per day (gpd) after the current structures on the project site are demolished. According to Table 1 and Table 2 of the Preliminary Sewer Study for the proposed project (Appendix I), the net increase in wastewater flow compared to existing conditions would be about 16,200 gpd. Either way, average daily flows would be well within the capacities of the SJCWRP or the WNRP.

Response 1.2

This comment states that the Districts comply with the requirements of the Federal Clean Air Act (CAA) and the capacities of the District's facilities are based on regional growth forecasted by the Southern California Association of Governments (SCAG). Further, the comment adds that the letter does not guarantee wastewater service and all services provided by the Districts are dependent on SCAG regional growth forecasts.

As indicated in the Initial Study for the proposed project (see *Population and Housing*), the level of growth associated with the project would not exceed SCAG's regional population projections.

From: yayira@aol.com <yayira@aol.com>
Sent: Tuesday, June 8, 2021 11:09 PM
To: Jo-Anne Burns <JBurns@westcovina.org>
Subject: Public Hearing Comment

Letter 2

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Ms. Jo-Anne Burns
Planning Manager
City of West Covina
1444 W. Garvey Avenue 2 nd Floor, Room 208
West Covina, CA 91790
JBurns@westcovina.org

RE: PRECISE PLAN NO. 20-09 VESTING TENTATIVE TRACT MAP 83216 (20-03) GENERAL PLAN AMENDMENT NO. 20-04 TREE REMOVAL PERMIT NO. 21-05 MITIGATED NEGATIVE DECLARATION OF ENVIROMENTAL IMPACT

Dear City Planner,
Let me start off with the Traffic analysis incorporates the findings of the Focused Traffic Analysis prepared by Ganddini Group dated November 16, 2020 were not accurate due to COVID19 stay at home orders.

Even though the report mentions the numbers are not accurate and 2018 numbers were utilized with a 1% per year increase added, it does not account for the new business nor the new townhomes that were built next to the proposed plan.

As a resident in the community, it is known that Cameron is a busy street during morning peak hours. Specifically, with the left turning lane into Toluca and left turning lane into Orange. With the proposed project it would cause stress on the center turning lanes. For example, a vehicle waiting in the center turning lane going left into Floor and Décor driveway versus a vehicle exiting the proposed project area making a left. What is the proposed solution to real life traffic scenarios? What is the proposed solution to the traffic waiting to turn into the new projected driveway during peak hours? The West Covina community benefits from having local/small businesses on West Cameron Avenue as it prevents additional traffic congestion on weekends. With the current business complex residents do not have to worry about giant townhomes looking into their backyards/neighborhoods. The traffic report also downplays the number of New Daily Trips during AM and PM hours. With 84 new townhomes and families moving into some units there also comes additional traffic in the AM and PM peak hours with parents driving the children to and from school. It is almost impossible to note that there are an added 115 daily trips during AM and PM peak hours if the report accounted for such additional trips.

In the report the proposed project is requesting for changes to zoning to Neighborhood High land use which goes hand in hand with traffic increase. The neighborhood zoning should not be changed to accommodate for more dwelling units in the proposed acreage. West Covina is known for their small traditional community and the last thing residents want is for the city to be over developed with modern architecture structures that stick out like a sore thumb. Some examples of that are the already completed Cameron 56 project. The proposed projects architectural design does not match with the older homes around the area.

This environmental report also downplays the possible obstruction to scenic vistas for the community that sits behind the proposed 39-foot townhomes. Even though the city of West Covina does not officially have designated State Scenic areas, the communities South (behind) of the proposed project currently have views to the San Gabriel Mountains. Hence the reason why this report downplays the actual impact of scenic view obstruction this project would cause to those homes. The question is if this report says there is no impact to scenic views then it can safely be concluded that the developers will not upsell some of the proposed townhomes because of the access to the San Gabriel Mountains views? No homeowner wants to look out their window or go into their backyard and see a 39-foot structure versus mountains/greenery. This proposed project may work in a different area of West Covina, like where the Edwards theater sits.

The developer is also asking for special concessions to accommodate for their project like 7-foot setbacks from the street versus 10 feet. A private resident of West Covina would have a difficult time being granted such approval. In conclusion, the project is ambitious for the acreage. As a resident of West Covina, I oppose the proposed project not only for the number of units, height of each unit, modern architecture but also for its traffic and small community impact. The City of West Covina would be losing small businesses to a large development. Lastly, a new traffic impact report should be included now that the Cameron 56 project has been completed and the COVID 19 stay at home orders have been lifted.

Sincerely,
The Diaz family

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2.4

Letter 2

COMMENTER: The Diaz Family

DATE: June 8, 2021

Response 2.1

The commenter states that the traffic report prepared by Ganddini were not accurate due to COVID-19 stay at home orders and does not account for new businesses and homes that were “built next to the proposed plan.” The commenter also states that the proposed project would “create stress on the center turning lanes,” apparently referring to potential conflicts between vehicles turning into these center turning lanes from different nearby properties along Cameron; and states that the “Traffic Report” downplays the number of new daily trips resulting from the proposed project.

Section 4.1, *Transportation* of the IS-MND includes a comprehensive discussion of the potential transportation-related impacts of the project per the impact criteria included in the Initial Study environmental checklist. This analysis is based on a Focused Traffic Analysis of the proposed project completed by Ganddini Group in November 2020 and included as Appendix D of the IS-MND. Estimated weekday AM peak hour, weekday PM peak hour, and total daily trips of the proposed project compared to existing uses on the project site are shown in Table 20 of the IS-MND and Table 2 of the Focused Traffic Analysis. Trip generation (including daily rates) is based on the Institute of Transportation Engineers, *Trip Generation Manual*, 10th Edition, 2017. This manual is the recommended and often required source for determining trip generation rates for jurisdictions throughout California

The Focused Traffic Analysis includes a queuing analysis for the project driveway at West Cameron Avenue. In this analysis, the 95th percentile queue length analysis required 25 feet of storage length within the two-way left turn median on West Cameron Avenue, and more than 25 feet of queue length is provided. Therefore, based on the AM peak hour and PM peak hour queue length analysis, sufficient storage length is provided. Also, a level of service analysis was conducted at the project driveway and the intersection is projected to operate at acceptable levels of service for Existing Plus Project conditions during both peak hours

The Focused Traffic Analysis notes that, due to the COVID-19 pandemic, traffic volumes have been generally less than they were during pre-pandemic conditions. For this reason, the standard industry practice of using historical pre-pandemic traffic counts and factoring with a growth rate was the methodology chosen to determine existing traffic counts. This allows for an analysis as close to what current traffic counts would be absent a pandemic as is possible. This methodology is the preferred methodology to account for the COVID-19 pandemic as defined in the Institute of Transportation Engineers, *What a Transportation Professional Needs to Know about Counts and Studies during a Pandemic*, July 2020, and is the accepted and preferred methodology for jurisdictions throughout California, including the City of West Covina.

While specific individual projects may not be accounted for between the date of the historical traffic counts and the traffic impact analysis, increasing the 2018 traffic counts with an annual ambient growth rate accounts for additional traffic on the roadway network during this time span. Furthermore, as a conservative analysis, the assumption was made that once the COVID-19 pandemic is fully over, traffic volumes will return to pre-pandemic levels. It is not yet clear if this will actually occur, due to different factors such as the increase in telecommuting which may become the new normal instead of a momentary reaction to the pandemic.

Response 2.2

Interspersed with the traffic-related comments referred to in Response 2.1, the commenter also states that “With the current business complex residents do not have to worry about giant townhomes looking into their backyards/neighborhoods,” and states that the IS-MND does not adequately discuss obstruction of scenic vistas. The commenter then goes on (after finishing their comments related to traffic) to state that the site’s zoning should not be changed to allow more units, and that the project’s architecture and scale would be incompatible with older neighboring homes.

As shown on Figure 3 of the IS-MND, there is a minimum 50-foot setback between neighboring backyards and the nearest proposed townhomes on the project site. As stated on page 5 of the IS-MND, “Buildings would be set-back 50 feet from the southern boundary to maintain privacy for neighboring, single-family properties to the south.” As shown on Figure 8 of the IS-MND, trees and other vegetation are also proposed along the property line between the project site and neighboring homes to the southwest.

Potential effects of the proposed project on publicly available scenic vistas are discussed on page 22 of the Draft IS-MND:

From Cameron Avenue, existing development and mature street trees limit viewsheds that would give access to scenic vistas, even where the San Gabriel Mountains are visible in the background. Immediately north of the project site, existing commercial development either fully or partially block views of these mountains from Cameron Avenue. While the density would increase compared to existing conditions, there are no scenic public views across the site that would be substantially blocked by the proposed development and thus the proposed project would not have a substantial adverse effect on a scenic vista.

While it is possible that some views from private spaces on neighboring properties could be fully or partially blocked by the proposed development, views from private spaces are not public views. As stated on page 21 of the IS-MND, “A scenic vista is defined as a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the public, generally. Public views are those experienced from a publicly accessible vantage point, such as a roadway or public park.”

As acknowledged on page 23 of the IS-MND, “The project would increase massing of buildings throughout the site and would increase height where ground-level surface parking is currently in place,” but “Increased density of both structures and landscape materials would contribute to the Downtown Plan vision of making streets walkable and integrating a mix of commercial and residential uses along Cameron Avenue and in its vicinity.” As stated on pages 23-24 of the IS-MND:

The proposed project would be subject to City design review, including review of building elevations, colors and materials, and compliance with the Precise Plan standards per Article VI, Division 2 of the WCMC. The project design would be reviewed for approval by the Planning Commission as part of the Precise Plan application process. The City uses this regulatory procedure to verify that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area.

Response 2.3

The commenter raises the same issues related to potential obstruction of scenic views from neighboring backyards and the scale of the proposed buildings compared to neighboring homes as in Comment 2.2, which have already been addressed in Response 2.2.

Response 2.4

The commenter expresses concern regarding the setbacks and overall size of the proposed project. The commenter adds that a new traffic impact report should be included since the neighboring Cameron 56 project has been completed and the COVID 19 stay at home orders have been lifted.

This comment expresses an opinion regarding the makeup of the proposed project and does not directly pertain to or question the adequacy of the IS-MND or the CEQA process, but issues of aesthetic compatibility with surrounding uses were analyzed in the IS-MND, as discussed above. Section 4.1, *Transportation* of the IS-MND includes a comprehensive discussion of the potential transportation-related impacts of the project per the impact criteria included in the Initial Study environmental checklist. As shown in Table 20 of the IS-MND, the proposed project would result in an increase in vehicle trips generated from the project site compared to existing conditions, but it would result in a net decrease in AM and PM peak hour trips from the project site compared to existing conditions. Redoing the traffic impact report would not change this conclusion.

From: thomas jewik <tjewik@gmail.com>
Sent: Monday, June 7, 2021 3:59 PM
To: PlanningDivision <planningdivision@westcovina.org>
Subject: West Cameron II Project

Letter 3

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I have looked at some of the documents on the West Covina web site and there are 100's of pages. At general glance my concerns are the noise and dust generated during construction as my backyard shares the back wall with the project. Not sure if there is a way to mitigate that. I know for whatever reasons, this condensed housing project is probably financially driven for city revenue needs. Nonetheless, I still worry a bit about noise and the loss of privacy as multistory buildings are being constructed. Are there plans on putting more trees or other vegetation on the back wall ? Since it will be private property, how enforceable are those plans if it were to be done.

3.1

Thank you for looking into this for me.

Thomas Jewik
1625 Sawyer Ave, West Covina, CA 91790

Letter 3

COMMENTER: Thomas Jewik

DATE: June 7, 2021

Response 3.1

The commenter expresses concern about potential dust and noise generated by construction of the proposed project. Furthermore, the commenter adds that there will be a loss of privacy and asks if there are plans to add trees or vegetation along the back wall of the project and how enforceable those plans would be.

As discussed on pages 61 and 102 of the IS-MND, South Coast Air Quality Management District (SCAQMD) Rule 403 includes requirements for application of water or stabilizing agents to prevent generation of dust plumes, pre-watering materials prior to the use of tarps to enclose haul trucks, stabilizing sloping surfaces using soil binders until vegetation or ground cover efficiently stabilize slopes, hydroseeding prior to rain, and washing mud and soils from equipment at the conclusion of trenching activities. In addition, with implementation of Mitigation Measure N-1, *Construction Noise Reduction*, and compliance with the construction hours requirements of the West Covina Municipal Code, construction noise impacts would be reduced to a less than significant level.

As shown on Figure 8 of the IS-MND, trees and other vegetation are proposed along the property line between the project site and neighboring homes to the southwest. As stated on pages 23-24 of the IS-MND, the proposed project would be subject to City design review. This design review and approval of project plans and conditions of approval that would be imposed on the project by the City would give the City the opportunity to require that the trees shown on the landscaping plan would actually be planted.