

COMMENTS AND RESPONSES

The Initial Study/Mitigated Negative Declaration (IS/MND) for The Grove at Merced Specific Plan project at 1912 West Merced Avenue (proposed project) was circulated for a 20-day public review period that began on February 22, 2022 and ended on March 14, 2022. The City of West Covina received one written comment on the IS/MND. The California Environmental Quality Act (CEQA) Guidelines Section 15074(b) requires the decision-making body of the lead agency to consider the proposed IS/MND and comments received during the public review process. The comment letter and response are provided in this document, which has been prepared in accordance with CEQA.

Table 1 lists the public agency that submitted written comments on the IS/MND, along with the page number on which the commenter's letter response appears.

| TABLE 1: LIST OF WRITTEN COMMENT LETTERS RECEIVED | | | |
|--|---|---------------|--------------------------|
| Letter No. | Agency/Individual | Date | Response Page No. |
| 1 | Los Angeles County Sanitation Districts | March 9, 2022 | 4 |

The body of the comment letter is separated into individual comments, which are numbered. This results in a tiered numbering system.

COMMENT LETTER NO. 1



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

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March 9, 2022

Ref. DOC 6470367

Ms. Jo-Anne Burns
City of West Covina
1444 West Garvey Avenue South
West Covina, CA 91790

Dear Ms. Burns:

NOI Response to the Grove at Merced Specific Plan

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND) for the subject project on February 25, 2022. The proposed project is located within the jurisdictional boundaries 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 8J Trunk Sewer, located in Willow Avenue, north of Yarnell Street. The Districts' 15-inch diameter trunk sewer has a capacity of 2 million gallons per day (mgd) and conveyed a peak flow of 1.1 mgd when last measured in 2015. 1-1
2. The expected average wastewater flow from the project site, described in the MND as 39 townhomes, is 7,605 gallons per day. 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. 1-2
3. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant located adjacent to the City of Industry, which has a capacity of 100.0 mgd and currently processes an average flow of 61.2 mgd. 1-3
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 used by the Districts for its capital facilities. 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. 1-4

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 CAA. 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.

1-5

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacs.org.

Very truly yours,



Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

cc: A. Schmidt
A. Howard

LETTER 1

Mandy Huffman, Environmental Planner
Facilities Planning Department
Los Angeles County Sanitation Districts
1955 Workman Mill Road
Whittier, CA 90601-1400

Response 1-1

This comment states that wastewater flow originating from the project site would be discharged to a local sewer line for conveyance, which is not maintained by the Los Angeles County Sanitation Districts (Districts), to the Districts' Joint Outfall H Unit 8J Trunk Sewer. The Joint Outfall H Unit 8J Trunk Sewer has a capacity of 2 million gallons per day (mgd) and conveyed a peak flow of 1.2 mgd when last measured in 2015.

Based on the information provided by Districts, the Joint Outfall H Unit 8J Trunk Sewer would have sufficient available sewer capacity to meet the demands of the proposed project.

Response 1-2

The comment states that the expected average wastewater flow from the proposed 39 townhome units would be 7,605 gallons per day (gpd).

Response to Checklist Question 3.19a in the IS/MND states that the proposed project would result in the generation of approximately 10,140 gpd of wastewater, which is higher than the estimate provided by the comment. The calculation presented in the IS/MND uses the Districts' wastewater generation factor for single-family homes while the Districts' estimated wastewater flow was calculated using the Districts' wastewater generation factor for condominiums. The estimated wastewater generation presented in the IS/MND represents a more conservative analysis. The information provided by this comment does not raise any new significant environmental issue and the impact conclusion would remain the same. The Districts' trunk sewer would have sufficient available sewer capacity and San Jose Creek Water Reclamation Plant (WRP) would have adequate remaining available treatment capacity to accommodate the proposed residences on the project site, and impacts would remain less than significant.

Response 1-3

The comment states that wastewater generated by the proposed project will be treated at the San Jose Creek WRP, which has a capacity of 100.0 mgd and currently processes an average flow of 61.2 mgd.

Response to Checklist Question 3.19a in the IS/MND states that wastewater generated from the project site would be treated at the San Jose Creek WRP. The WRP treats approximately 58.5 mgd of wastewater and has the capacity to treat up to 100 mgd of wastewater. The IS/MND presents a lower amount of wastewater that is treated at the San Jose Creek WRP than provided by the commenter. Based on the Districts' expected average wastewater flow of 7,605 gpd from the proposed townhomes, the San Jose Creek WRP would have adequate remaining available treatment capacity to accommodate the proposed project. Based on the average wastewater flow of 10,140 that was presented in the IS/MND, which is a more conservative estimate than provided by the Districts, the San Jose Creek WRP would still have adequate remaining available treatment capacity to accommodate the proposed project. The information

provided by this comment does not raise any new significant environmental issues and does not change the impact conclusions. Impacts would remain less than significant.

Response 1-4

The comment states that payment of a connection fee may be required before the proposed project is permitted to discharge to the Districts' Sewer System or to increase the strength or quantity of wastewater discharged from connected facilities. The comment also includes information on how to obtain more information regarding the connection fee application procedure and fees, as well as a copy of the Connection Fee Information Sheet.

The applicant will be made aware of the sewer connection fee and, if an expansion of the sewerage system is necessary to accommodate the proposed project, the applicant will be required to pay the Districts' capital facilities fee to fund said expansion.

Response 1-5

The comment states that the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Government (SCAG). The comment further states that all expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the regional growth forecasts. The available capacity of the Districts' treatment facilities will be limited to levels associated with this regional growth forecast. The 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.

The applicant will be made aware of the Districts' intent to provide wastewater services up to the levels that are legally permitted. The existing capacity for the Amar Road Trunk Sewer and at the San Jose Creek WRP is acknowledged. As discussed in Response to Checklist Question 3.14a of the IS/MND, the proposed project is estimated to increase population by 135 persons, which would represent approximately two percent of the projected population increase for the City and would be within the SCAG 2040 population forecast for the City. The information provided by the Districts does not raise any new significant environmental issues and does not change the impact conclusions. Impacts to wastewater facilities would remain less than significant.