

COMMENTS AND RESPONSES

The Initial Study/Mitigated Negative Declaration (IS/MND) for the West Covina Medical Center Behavioral Health Building Addition project at 725 South Orange Avenue (proposed project) was circulated for a 20-day public review period that began on January 15, 2025 and ended on February 3, 2025. The City of West Covina received two written comment letters on the IS/MND. 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 letters and responses are provided in this document 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	Department of Toxic Substance Control	January 22, 2025	5
2	Los Angeles County Sanitation Districts	January 28, 2025	8

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

COMMENT LETTER 1



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 22, 2025

Jo-Anne Burns
Deputy Community Development Director
City of West Covina
1444 West Garvey Avenue South
West Covina, CA 91790
jburns@westcovina.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE WEST COVINA MEDICAL CENTER BEHAVIORAL HEALTH BUILDING ADDITION DATED JANUARY 15, 2025, STATE CLEARINGHOUSE NUMBER [2025010474](#)

Dear Jo-Anne Burns,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the West Covina Medical Center Behavioral Health Building (Project). The proposed Project would construct a 4-story 42,000-square-foot behavioral health facility on the east side of the 2.83-acre West Covina Medical Center property. The existing 55 parking spaces located in the eastern portion of the Project site would be removed and 4 parking spaces would remain. The carport and parking spaces to the west of the existing building would be removed with only 2 parking spaces remaining. DTSC recommends and requests consideration of the following comments:

1. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition,

1-1

1-2

sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

1-2
(cont.)

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

1-3

DTSC appreciates the opportunity to comment on the MND for the West Covina Medical Center Behavioral Health Building Addition. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

1-4

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Jo-Anne Burns
January 22, 2025
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cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Teresa Li
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Nick Hermann
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Dave Kereazis
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LETTER 1

Tamara Purvis, Associate Environmental Planner
HWMP – Permitting Division – CEQA Unit
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Response 1-1

The introductory comment summarizes the project description. The comment does not address the adequacy or accuracy of the IS/MND. No further response is required.

Response 1-2

The comment states that if buildings or other structures are to be demolished, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. The comment further states that the removal, demolition, and disposal of these chemicals should be conducted in compliance with California environmental regulations and policies. Additionally, sampling near current and/or former buildings is recommended to be conducted in accordance with the Department of Toxic Substances Control's (DTSC) Preliminary Endangerment Assessment (PEA) Guidance Manual.

No buildings or other structures would be demolished as a result of the proposed project. The proposed building would be located on an existing surface parking lot on the east side of the project site and would adjoin the existing medical hospital. As discussed in Response to Checklist Question 3.9a-b, all hazardous materials during construction and operational activities associated with the proposed project would be handled in compliance with applicable standards and regulations. Impacts would remain less than significant, and no revisions to the IS/MND are required in response to this comment.

Response 1-3

The comment states that DTSC recommends that all imported soil and fill material should be tested to assess whether any contaminants of concern meet the screening levels that are outlined in the DTSC PEA Guidance Manual. DTSC also advises the developer to reference the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. The comment also includes information on how to obtain more information on soil sampling.

The proposed project would comply with applicable federal, state, and local standards and regulations pertaining to hazardous materials. The use of imported soil and fill material is not expected for the proposed project. Nevertheless, the applicant will be made aware of DTSC's PEA Guidance Manual and Information Advisory Clean Imported Fill Material Fact Sheet. This comment does not change the impact conclusions of the IS/MND. Impacts would remain less than significant, and no revisions to the IS/MND are required in response to this comment.

Response 1-4

The concluding comment states that DTSC appreciates the opportunity to comment on the IS/MND for the proposed project, and thanks the City of West Covina for its assistance in protecting the state's people and environment from the harmful effects of toxic substances. The comment also provides information on how to respond to DTSC's comments. The comment does not address the adequacy or accuracy of the IS/MND. No further response is required.

COMMENT LETTER 2



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

Robert C. Ferrante

Chief Engineer and General Manager

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Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998

(562) 699-7411 • www.lacsd.org

January 28, 2025

Ref. DOC 7411854

VIA EMAIL jburns@westcovina.org

Ms. Jo-Anne Burns, Deputy Development Director
City of West Covina, Planning Division
1444 West Garvey Avenue S, Room 208
West Covina, CA 91790

Dear Ms. Burns:

NOI Response to West Covina Medical Center Behavioral Health Building Addition Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND) for the subject project located in the City of West Covina on January 21, 2025. The proposed project is located within the jurisdictional boundaries of District No. 22. We offer the following comments regarding sewerage service:

2-1

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' 30-inch diameter Joint Outfall H – Unit 8M Trunk Sewer, located in South Orange Avenue, east of West Durness Street. This trunk sewer has a capacity of 19.1 million gallons per day (mgd) and conveyed a peak flow of 7.3 mgd when last measured in 2021.

2-2

2. The expected average wastewater flow from the project, described in the Initial Study as 42,000 square feet of behavioral health facility with a kitchen services area that would serve 117 patient beds, is 27,225 gallons per day. A copy of the District's average wastewater generation factors is available on our website at [Table 1, Loadings for Each Class of Land Use](#).

2-3

3. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 60.1 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) in the City of Carson.

2-4

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, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

2-5

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 City that the Districts intend to provide this service up to the levels that are legally permitted and to inform the City of the currently existing capacity and any proposed expansion of the Districts' facilities.

2-6

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsdsd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

cc: D. Hatch
A. Howard

LETTER 2

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

Response 2-1

The introductory comment is an acknowledgement from the Los Angeles County Sanitation Districts (Districts) that it received the Notice of Intent to Adopt an MND for the proposed project. The comment also states that the proposed project is located within the jurisdictional boundaries of District No. 22. The comment does not address the adequacy or accuracy of the IS/MND. No further response is required.

Response 2-2

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 8M Trunk Sewer. The trunk sewer has a capacity of 19.1 million gallons per day (mgd) and conveyed a peak flow of 7.3 mgd when last measured in 2021.

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

Response 2-3

The comment states that the expected average wastewater flow from the proposed 42,000-square-foot behavioral health facility with 117 patient beds would be 27,225 gallons per day (gpd).

The proposed project would provide 71 new licensed beds. The existing medical facility currently has 46 beds and would remain unchanged. Response to Checklist Question 3.19a in the IS/MND states that the proposed project would result in the generation of approximately 36,423 gpd of wastewater, which is higher than the estimate provided by the comment. 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 issues 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 building on the project site, and impacts would remain less than significant.

Response 2-4

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 60.1 mgd. It further states that all biosolids and wastewater flows that exceed the capacity are diverted and treated at the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant).

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 currently treated at the San Jose Creek WRP than provided by the commenter. Based on the comment's average wastewater flow at the San Jose Creek WRP, the WRP currently has an available remaining capacity of 39.9 mgd. Using the Districts' expected average wastewater flow of 27,225 gpd from the proposed project and available remaining capacity, the San Jose Creek WRP would have adequate remaining available treatment capacity to accommodate the proposed project. Using the average wastewater flow of 36,423 gpd that was presented in the IS/MND, which is a more conservative estimate, and the available remaining capacity 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 2-5

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. 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. The information provided by the Districts does not raise any new significant environmental issues and does not change the impact conclusions of the IS/MND. Impacts to wastewater facilities would remain less than significant.

Response 2-6

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 City that the Districts intend to provide this service up to the levels that are legally permitted and to inform the City 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 Joint Outfall H – Unit 8M 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 would provide a net increase of approximately 50 jobs in the City that can be filled by the local labor force. While the proposed project would increase the number of employees on the project site, it is expected that workers from nearby communities would be available to serve the needs of the proposed project. Employees are not expected to relocate to the surrounding area and, thus, would not result in a substantial permanent increase in population. Thus, the proposed project is expected to be within SCAG's growth forecasts for the City. The information provided by the Districts does not raise any new significant environmental issues and does not change the impact conclusions of the IS/MND. Impacts to wastewater facilities would remain less than significant.