

Response 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 1501 Del Norte Street Residential Project (project).

The Draft IS-MND was circulated for a 30-day public review period that began on October 28, 2025 and ended on December 1, 2025, with five additional days included to accommodate the Thanksgiving holiday. The City received two comment letters on the Draft IS-MND that 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.

Table 1 List of Comments Received

Letter Number	Commenter	Page Number
1	Los Angeles County Sanitation Districts	2
2	California Department of Transportation	4

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).



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

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November 24, 2025

Ref. DOC 7630955

VIA EMAIL JAnderson@willdan.com

Letter 1

Mr. Jeff Anderson, Contract Planner
City of West Covina, Planning Division
1444 West Garvey Avenue S, Room 208
West Covina, CA 91790

Dear Mr. Anderson:

NOI Response to 1501 Del Norte Street Residential 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 October 28, 2025. The proposed project is located within the jurisdictional boundaries of District No. 22. We offer the following comments regarding sewerage service:

Response 1.1

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' 22-inch diameter Joint Outfall H Unit 8J Trunk Sewer, located in South Willow Avenue, south of West Ituni Street. This trunk sewer has a capacity of 2.0 million gallons per day (mgd) and conveyed a peak flow of 1.1 mgd when last measured in 2015.
2. The expected average wastewater flow from the project, described in the NOI as 34 single-family detached homes and 248 attached townhomes and stacked flats, is 57,200 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](#).
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 62.6 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.
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.

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.

Response 1.2

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: C. Chang
A. Howard

Letter 1

COMMENTER: Patricia Horsley, Los Angeles County Sanitation Districts (LACSD)

DATE: November 24, 2025

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. The capacity amounts noted in the letter are consistent with the capacity noted in the IS-MND.

These comments are informational and do not directly comment on the contents of IS-MND or the CEQA process, and confirm that the project's impacts on utilities will be less-than-significant.

Response 1.2

This comment states that the Districts comply with the requirements of the Federal Clean Air Act 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.

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.

California Department of Transportation

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December 1, 2025

Sonia Griego, Contract Planner
City of West Covina, Planning Division
1444 West Garvey Avenue S, Room 208
West Covina, California 91790

Letter 2

RE: 1501 Del Norte Street Residential Project
- Mitigated Negative Declaration (MND)
SCH# 2025101508
GTS# 07-LA-2025-04942
Vic. LA 10 PM: 34.857

Dear Sonia Griego,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The 1501 Del Norte Street Residential Project (hereafter referred to as "proposed project" or "project"), includes a General Plan Amendment, a Specific Plan, a Zone Change, a Precise Plan, a Tentative Tract Map and a Tree Removal Permit. The proposed project would include the demolition of the existing buildings and structures on the project site (requiring a demolition permit); followed by construction of 34 single-family detached homes and 248 attached townhomes and stacked flats, for a total of 282 residential units. The project site is 13.56 acres, of which 13.19 acres would be developed for residential uses and common space, and 0.37 acre would be used as an extension and dedication of West Del Norte Street from its current terminus east to North Sunset Avenue. Each of the residential units would include a two-car garage and there would also be 77 uncovered parking spaces for guest parking, resulting in 641 total parking spaces. 26-foot private lanes would provide vehicular access to all homes, which would be connected by the primary entrance on West Del Norte Street, and the secondary entrance on North Nora Avenue. Both entries would be defined by pedestrian entry pilasters with project signage, accent trees, enhanced landscaping and paving, and parkways and sidewalks on both sides. In addition, pedestrians will also be able to access the project site via two access points from Del Norte Park.

After reviewing the MND, Caltrans has the following comments:

Response 2.1

As outlined in the Traffic Study Scoping Agreement (Appendix J), a queuing analysis will be conducted to assess freeway off-ramp queues to ensure that project induced trips do not create unsafe conditions at intersections or on the mainline. The study should include, but not be limited to, the following locations: I-10 at Sunset Ave and I-10 at Pacific Ave.

A Multi-Modal Conflict Analysis should also be conducted across the project area and at the above locations. This should include the identification and proposal of complete streets features and related street improvements (ADA curb ramps, sidewalks, bicycle lanes, high-visibility crosswalks, etc.) If any impacts are found to degrade conditions for any road users, they should be mitigated with project design changes and infrastructure investments that reduce trips made by car and induce demand for the safe use of alternative modes of travel.

While Caltrans supports infill development that does not further contribute to suburban sprawl, based the amount of car parking provided and the auto-oriented design of the proposed site plan, the 1501 Del Norte Street Residential Project is currently designed in a way that potentially induces demand for unnecessary personal vehicle trips. For California to achieve its goals, this demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Provide for a mixture of land use types within the Project's zoning area to allow for adaptive reuse in the future. This can allow housing, goods, services, and jobs to be created near one another.
- Increase density, both vertically and horizontally. By bringing the built environment closer together, and building up instead of out, it becomes possible to greatly reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.
- Reducing the amount of parking whenever possible, as research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. If surface parking must be built, it is recommended that it not face the street directly. By shifting the parking to the rear or interior of the project site, a more inviting streetscape can be created. A more active frontage, against the sidewalk, can encourage both recreational and transportation walking.
- Create a streetscape that is safe and comfortable for all users. Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.
- Implementation of Transportation Demand Management (TDM) strategies to reduce transportation impacts, which may include increased transit access, commute trip

Response 2.2

reductions such as rideshare programs, shared mobility facilities (bicycle or vehicular), increased bicycle and pedestrian infrastructure.

While the project appears to satisfy the City of West Covina's requirements related to pedestrian and bicycle accommodation, please consider the following improvements:

Response 2.3

- Since the specific location and type of bike parking is not included in the Specific Plan, we recommend you follow the APBP Bicycle Parking Guidelines for effective siting (particularly in common areas) and design: <https://www.apbp.org/Publications>
- Include a sidewalk in the proposed Del Norte St. extension (south side of Del Norte St. between Hollow Ave. and Sunset Ave.).
- Narrow Del Norte St. and provide traffic calming, since the current 40 feet of width is likely no longer needed with the school closed. Even simply striping the parking lanes could help, similar to Rowland Ave.
- Construct a curb extension on the northeast corner of Nora Ave./Del Norte St. to shorten the crossing distance and slow vehicle turns.
- Make general traffic calming (e.g., speed humps, curb extensions) and crosswalk improvements between the project site and Monte Vista Elementary School, to/from the nearby transit bus stops, and to/from the West Covina Mall & the Civic Center; there will likely be increased pedestrian trips to/from these destinations due to the project.
- Construct curb extensions on both ends of the Sunset Ave./Rowland Ave. crosswalk to shorten this crossing. Evaluate if a Pedestrian Hybrid Beacon is warranted at this crossing due to increased pedestrian trips as a result of the project.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2025-04942.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR Branch Chief

Cc: State Clearinghouse

Letter 2

COMMENTER: Miya Edmonson

DATE: December 1, 2025

Response 2.1

The letter is a summary of the project details and does not include comments on the adequacy of the IS-MND. The commenter acknowledges that the Traffic Scoping Agreement (Appendix J) outlines that a queuing analysis will take place to assess freeway off-ramp queues. The commenter says that the study should include, at minimum, Interstate 10 at Sunset Avenue and Interstate 10 at Pacific Avenue. The commenter states that a Multi-Modal Conflict Analysis should be conducted at these two locations and across the project area, including complete streets features and related street improvements. The commentor states that if “any impacts are found to degrade conditions for any road users, they should be mitigated” with design changes to reduce vehicle miles traveled (VMT) and to “induce alternative modes of travel.”

Urban Crossroads prepared a Traffic Analysis for the project on October 23, 2025, which was scoped and approved by the City of West Covina in accordance with the city’s transportation study guidelines and CEQA requirements. The scope did not include freeway ramp queuing or a Multi-Modal Conflict Analysis because these elements were not identified as necessary based on the City’s criteria or the results of the analysis. The queuing analysis conducted for the project evaluated driveways and adjacent intersections, including Sunset Avenue and Rowland Avenue (North and South), and confirmed that available stacking distances are adequate with no risk of spillback. Additionally, the project is not anticipated to generate volumes that would materially affect ramp operations. As identified in the Project Trip Generation in the Traffic Study, the Project is expected to generate a total of 131 AM peak hour trips and a total of 154 PM peak hour trips. Of these trips only 30 percent of these are anticipated to use Sunset Avenue south of Workman Avenue towards Interstate, resulting in fewer than 50 peak hour trips.

Additionally, a Multi-Modal Conflict Analysis was conducted for the immediate project area and was included the Traffic Study Scoping Agreement (Appendix K). This analysis included standards for new crosswalks and sidewalks, and also included standards and locations for new accessible curb ramps that would be required to implement the Project. There are also no bicycle facilities in the vicinity of the Project site. Similar to the Traffic Analysis, the scope was only conducted in the immediate vicinity of the Project site due to the limited volumes discussed above. Therefore, potential transportation impacts would be less than significant, and the existing analysis is adequately addresses the transportation impacts under CEQA and City requirements.

Response 2.2

The commenter acknowledges that the project is infill and expressed support for infill development, but expresses concern that the project could potentially include demand for unnecessary vehicles trips due to the high amount of parking included in the project design. To remedy this, the commenter recommends facilitating mixed-use development through zoning on the project site, increasing density, reducing parking whenever possible, siting parking so it does not face the street, creating a more inviting and safe streetscape for all users, reducing traffic speeds, incorporating separated bikes lanes, wide sidewalks, pedestrian islands, street furniture, reductions in crossing distances, and incorporating visual indicators such as lights, signage, and striping.

The commenter also recommends implementation of Transportation Demand (TDM) strategies such as increased transit access, rideshare programs, shared mobility facilities, and increased bicycle and pedestrian infrastructure.

As discussed in Section 17, *Transportation*, of the IS-MND, the potential transportation impacts would be less-than-significant, and would comply with the various applicable policies and regulations of the City of West Covina regarding the circulation system, including transit, roadway, bicycle and pedestrian facilities, each of which serves as a TDM strategy. For example, the project will construct new sidewalks along the site boundary to improve pedestrian connectivity; extend West Del Norte Street to North Sunset Avenue to enhance circulation; install ADA-compliant curb ramps at driveways and intersections; maintain access to nearby Foothill Transit stops; and provide internal private lanes that accommodate emergency vehicles and safe pedestrian movement. These features support multimodal travel and reduce reliance on single-occupancy vehicles, consistent with TDM principles.

Additionally, based on Urban Crossroad's review of applicable VMT screening thresholds as recommended by the San Gabriel Valley Council of Governments, the proposed project would meet the Transit Priority Area Screening and Low VMT Area screening criteria. Despite the increase in VMT resulting from the project, the increase is below the VMT threshold of significance pursuant to standards enacted by the City of West Covina. For these reasons, the existing analysis adequately addressed the transportation impacts under CEQA and City requirements, and additional measures are not necessary.

Response 2.3

The commenter requests that the project incorporates multiple recommendations related to pedestrian and bicycle accommodations, including following Association of Pedestrian and Bicycle Professionals Bicycle Parking Guidelines, narrowing and including a sidewalk in the Del Norte Street extension, constructing curb extensions to shorten pedestrian crossing time, incorporating traffic calming measures, and evaluating implementation of a Pedestrian Hybrid Beacon.

As discussed in responses 2.1 and 2.2, the project would incorporate a range of TDMs compliant with the City's existing requirements including pedestrian facilities and paths, and would comply with the various applicable policies and regulations of the City of West Covina regarding the circulation system, including transit, roadway, bicycle and pedestrian facilities. The existing analysis adequately addressed the transportation impacts under CEQA and City requirements. Therefore, the potential transportation under the proposed project would be less-than-significant, and additional mitigation measures are not necessary for CEQA compliance.
