

Mt. San Antonio College  
2018 Educational and Facilities Master Plan  
Draft Environmental Impact Report  
Response to Comments

SCH No. 2018091004

May 24, 2019

*The commenting parties' formal comments are followed by  
Mt. San Antonio College's responses.*

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## CITY OF WALNUT

### VIA EMAIL AND HAND DELIVERY

May 22, 2019

Mikaela Klein, Senior Facilities Planner  
Facilities Planning & Management  
Mt. San Antonio College  
1100 North Grand Avenue  
Walnut, CA 91789-1399

**SUBJECT: Mt. San Antonio College (Mt. SAC) 2018 Educational and Facilities Master Plan (EFMP) Draft Environmental Impact Report (DEIR)**

Dear Ms. Klein,

The City of Walnut appreciates the opportunity to review Mt. SAC's 2018 EFMP DEIR, and have included the below comments as a Responsible Agency for your consideration:

### **EIR Approach**

The DEIR establishes an environmental baseline (2018) for evaluation of near-term Mt. SAC development program impacts through 2027 (10-year planning and development horizon). This includes a consistent baseline for existing conditions, including campus buildings, projected building activity, enrollment, and environmental setting within the 10-year planning horizon. The DEIR establishes a framework to addressing the project and cumulative impacts of the Long-Range Development Plan and EFMP *through 2027*, consistent with CEQA Section 15168, Program EIR. However, the DEIR lacks meaningful information regarding potential long-range projects *post-2027* and potential cumulative effects of any future projects that may be contemplated by the District (i.e. Phase 3). The DEIR should provide information concerning *post-2027* projects and assess their cumulative environmental effects.

1

**2018 Memorandum of Agreement; Schools and Public Institutional Zoning**

Discussion throughout the DEIR references the April 12, 2018 Memorandum of Agreement (MOA) between the City and Mt. SAC Community College District (District). A copy of the MOA is included in Appendix A to the DEIR. The City appreciates Mt. SAC's recognition of the MOA throughout the DEIR. It should be noted, however, that the Appended MOA is not the fully-executed agreement, and the City respectfully requests that the fully-executed MOA (copy attached) approved by the City Council and the District Board of Trustees be substituted in Appendix A to the DEIR.

2

In addition, discussion throughout the DEIR includes application of the City's pending Schools and Public Institutional (SPI) designation and ZCA/ZC for campus areas east of Grand Avenue. While the DEIR correctly recites that the City's Planning Commission recommended approval of the proposed SPI and ZCA/ZC and that the City Council continued consideration of the SPI and ZCA/ZC, the DEIR includes misstatements that should be corrected.

3

First, the DEIR incorrectly states that "Mt. SAC does not have to comply with the zoning regulations of the City of Walnut since the City's current Planning and Zoning Ordinance does not make specific provision for the location of public schools" (pages 1-2, 1-3). Although the City's current Zoning Ordinance does not include the proposed SPI land use designation, the existing Zoning Map adopted as part of the Zoning Ordinance and the City's General Plan both specifically designate the location of public schools. Consequently, the exemption under Government Code Section 53094(a) is not applicable. The District may avail itself of an exemption from the City's zoning ordinance for classroom facilities only pursuant to the procedural requirements of subsections (b) and (c) of Government Code Section 53094.

4

Second, the DEIR states that the City Council continued the proposed SPI and ZCA/CA "until the settlement agreement between Mt. SAC and the City is approved and enforceable." The DEIR further states: "[A]t this time the settlement agreement has not been finalized or approved by the governing bodies of Mt. SAC and the City." To be clear, the MOA is final and was approved by the City Council and the Board of Trustees. The MOA contemplates that the settlement will be further evidenced by a full settlement and release agreement that will include a stipulated judgment allowing for judicial enforcement. As referenced throughout the DEIR, the MOA established a mutual understanding between the parties as to the West Parcel, Physical Education Project (PEP), parking structures and future projects at Mt. SAC.

5

The City appreciates the DEIR references to the governing provisions of the MOA, including: 1.2 Project Locations and Setting, 3.2 Environmental Setting, 3.4 Project Background, and the Impact Analysis sections throughout the DEIR. Whether the City Council elects to revise the proposed SPI and ZCA/ZC to conform to the MOA's 400 foot setback for parking structures adjacent to residential uses as incorporated into the DEIR or postpone adoption of the SPI and ZCA/ZC until the stipulated judgment is entered as additional assurance to Walnut residents that the courts can enforce the 400 foot setback as applied to Mt. SAC projects will be determined by the City Council in its legislative discretion.

6

### **City of Walnut as Responsible Agency**

Table 3-5 of the DEIR identifies the City's oversight responsibilities as 1) Approval of Street Improvement Plans and construction easements (in public right-of-way); and 2) Administrative Review and Approval of Grading/Drainage Plans for Mt. SAC Non-Exempt Educational Facilities. In accordance with the MOA, grading and drainage plans for the West Parcel will be reviewed by the City Council. Table 3-5 of the DEIR should note this exception to the City's administrative review procedures. The City of Walnut General Plan (2018) is incorporated by reference (Section 15150) in its entirety and addressed in the Regulatory Setting environmental evaluation. Consistency with the General Plan is addressed in the Impact Analysis sections throughout the DEIR.

7

### **West Parcel Site**

Use limitations and allowable improvement activities associated with the West Parcel pursuant to the MOA are identified in the DEIR:

“Mt. SAC currently has no other plans for use/development of the West Parcel. Identification of potential future development scenarios for analysis purposes would be speculative. Should Mt. SAC pursue another use for the West Parcel in the future, that project would be subject to environmental review pursuant to CEQA.” (p. 4-9)

The type of environmental documentation for this future review is not indicated. The DEIR should specifically acknowledge that any future use or site improvements on the West Parcel shall be subject to project level review in compliance with CEQA. The DEIR (page 4-9) indicates the only difference between the scope of the original West Parcel Solar project and the new West Parcel Site Improvements project is the ultimate use of the pad to be created. Any future use or improvement on the West Parcel must at a minimum analyze and mitigate the geotechnical issues previously identified and left unresolved as well as direct and indirect impacts to the 16.72 acre portion of the West Parcel subject to the Restrictive Covenant discussed on DEIR page 4.3-5. In addition, Exhibit 4-3 identifies this pad area as “Impact Area for Solar and Pasture Projects.” References in the DEIR to the West Parcel Solar Project should be deleted.

8

According to the terms of the MOA, Mt. SAC was permitted to import approximately 140,000 cubic yards of soil from the Physical Education Project (PEP). However, since executing the MOA, the District has stopped processing its grading application and indicated that there is no immediate plan to conduct grading activities on the West Parcel, including on-site grading and soil import since soil from the PEP site was hauled off-site outside the City limits. The DEIR consistently references the “West Parcel Site Improvements project” as being consistent with the MOA. These provisions should be revised to accurately reflect the changed circumstances and acknowledge that any future use or proposed site improvements to West Parcel shall be reviewed and processed by the District in conformance with all applicable laws and with Section IV of the

MOA, including the requirement(s) to obtain all applicable City of Walnut approvals prior to the start of any work.

References within the DEIR also indicate that work on the West Parcel Site Improvements project are to begin in September 2017 and be completed February 2019. To date, the last grading plan check and site improvements for West Parcel provided in August 2018 remain incomplete and Mt. SAC has indicated that it will not pursue the previously proposed grading activities. Without an approved grading and site improvement plan(s), work is not able to commence as noted within the DEIR. The DEIR must be revised to reflect the current state of the West Parcel, changes in the scope of work, as soil export (approximately 140,000 cubic yards) from PEP is no longer to be taken to West Parcel and references to construction start and end dates should be removed.

8  
cont.

### **Construction Impacts and Phasing**

The DEIR provides program- and project-level review of construction traffic, grading and haul, air quality, noise and other impacts. In its NOP comments, the City expressed concern with construction phase impacts of new projects, and potential overlap with improvements for the West Parcel Site, construction of the Physical Education Complex, and Transit Center. Based on the DEIR, construction of proposed 2018 EFMP projects would not only overlap with each other, but these projects will be under construction at the same time as the PEP and the Transit Center. The City is concerned that the cumulative impacts of these projects is not fully evaluated and that the proposed mitigation measures fall short.

DEIR Construction Impact Areas (by Phase) are depicted in DEIR Exhibit 3-34. Table 3-4. Estimated Construction Schedules, illustrates an aggressive schedule for Phase 1A, 1B and On-Campus Cumulative Projects, with significant overlap evident for the June-December 2019 time frame. The "cumulative" construction impacts from the proposed 2018 EFMP projects and these projects is evaluated in the applicable cumulative impacts section for the topical issues in this Draft EIR.

9

Mitigation measures for significant construction traffic impacts include:

MM TRA-3 – Requires construction contractors to submit application for a truck hauling plan to the City of Walnut for review and approval prior to grading, demolition or construction

MM TRA-4 – Requires construction contractors to submit traffic control plans to Mt. SAC Facilities Planning and Management that show compliance with the Work Area Traffic Control Handbook (WATCH). Notification of City of Walnut, LACFD and LA Sheriff's Department is required.

MM TRA-5 – Requires encroachment permit from City of Walnut for construction work within public rights-of-way.

Construction-phase and operational-phase Transportation/Traffic impacts are addressed in Attachment A to this letter.

9  
Cont.

### Thresholds of Significance

The DEIR includes impact thresholds of significance (TOS) derived from the most recent CEQA Guidelines Appendix G Checklist revision (December 2018). In some cases, however, the adopted Mt. SAC 2016 CEQA Thresholds of Significance are included in addition to the Appendix G Checklist TOS. The DEIR states: "To the extent the following thresholds of significance are applicable to the proposed project, they shall be applied to determine the proposed 2018 EFMP's environmental impact". The use of Mt. SAC's previously adopted Thresholds of Significance (TOS) in combination with the latest CEQA Appendix G TOS is duplicative, and the extent to which the District thresholds are applicable in any of the impact sections is unclear. The City recommends eliminating use of the District's TOS in the document.

10

### Cumulative Impacts

The proposed Project would result in a significant and unavoidable cumulative Transportation/Traffic impact under Existing Plus Project Condition, 2021 Plus Project Condition and 2027 Plus Project Condition at the intersections of Mountaineer Road and Grand Avenue and Valley Boulevard and Grand Avenue, even with implementation of mitigation measures (MM TRA-1, MM TRA-2). These mitigation measures require Mt. SAC fair share intersection improvements for the Existing Plus Project and 2027 Full Buildout conditions. (See Attachment A, Ganddini Group TIA Review).

11

### Alternatives Analysis.

The DEIR includes an EFMP Moderate Growth Scenario Alternative (0.75% annual increase) and a High Growth Scenario (1.22%), based on 2016 SCAG RTP/SCS local agency forecasts within the District's service area. Given recent declining enrollment trends at other community colleges, it is unclear why Mt. SAC is not including a Low-Growth Scenario in the DEIR. Approximately half of California's community colleges, and three of the nine campuses in the L.A. Community College District have experienced declining enrollments in recent years<sup>1</sup>. The District projects that its annual growth rate will range between 0.18 and 1.22 percent over the 10-year planning horizon, with a mid-point of 0.75 percent (page 3-23, Table 3-2).

12

Other potentially feasible alternatives to reduce traffic impacts could include Campus Housing and Increased Transportation Demand Management (TDM) (i.e., in concert with the Transit Center project).

<sup>1</sup> *Community College Enrollment Drops by Double Digits on Some Campuses*; KPPC, September 7, 2017.

**Mitigation Monitoring Plan (MMP)**

The DEIR does not include a Mitigation Monitoring Plan (CEQA Section 15097). It is standard practice to make a draft MMP available for public inspection prior to adoption of findings in approving a project. Prior draft MMPs (2015, 2017) have provided little more than a list of mitigation measures with no assurance of the ability to implement and enforce the measures. The City requests an opportunity to review and comment on the 2018 EFMP MMP prior to the District's approval.

13

**Visual Impact**

Visual concerns expressed in the City's NOP comments with the Phase 1A Parking Structures and Structure R and Tennis Court (lighting) are adequately addressed in the DEIR through a series of Elevations, Exterior Perspectives, Lighting Plan, Architectural Renderings and View Analysis from surrounding public vantage points. It appears that the Phase 1A and 1B building projects would conform to the City's development standards under the SPI (yet to be adopted). All applicable City approvals shall be obtained prior to the start of construction. The City looks forward to being a part of the design and site selection process for these process to continue an open and collaborative communication, and to verify compliance with applicable Walnut Municipal Code and permitting requirements.

14

**Transportation/Traffic Impact Analysis**

Overall, the 2018 EFMP TIA generally follows established transportation planning standards for the area with some noted exceptions. (see Attachment 1 - Ganddini Group review and incorporated herein by reference). A number of the TIA review findings have the potential to alter the findings of significance and/or recommended mitigation measures. Therefore, the 2018 EFMP TIA must be revised to reflect these findings.

15

**Additional Comments (Attached Matrices)**

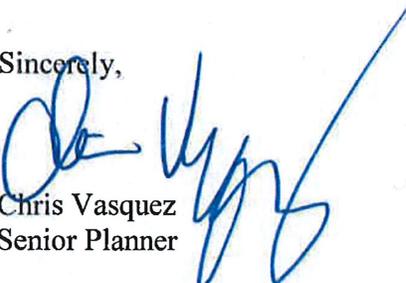
Additional comments related to the DEIR are also included in the form of matrices and provided as Attachment 2 (ECORP Consulting Inc., 2018 EFMP DEIR Comments) to this comment letter. The comments provided in the attachment shall be included herein by reference and submitted as part of the record for the 2018 EFMP DEIR.

16

Thank you again for providing the City of Walnut with the opportunity to comment on the 2018 EFMP DEIR. If you have any questions or require further information for inclusion in this process, please feel free to contact me at (909) 595-7543.

2018 EFMP DEIR Comment Letter  
May 22, 2019  
Page 7 of 7

Sincerely,

  
Chris Vasquez  
Senior Planner

cc: Nancy Tragarz, Mayor  
City Council  
City Manager  
Assistant City Manager – Development Services  
City Attorney

Attachments:

1. Ganddini Group Inc. 2018 EFMP DEIR Traffic Assessment
2. ECORP Consulting Inc. 2018 EFMP DEIR Comment Matrices
3. Fully Executed Memorandum of Agreement (MOA)

# **ATTACHMENT 1**

Ganddini Group Inc. 2018 EFMP DEIR Traffic Assessment



May 13, 2019

Mr. Thomas Holm, Senior Environmental Planner  
ECORP CONSULTING, INC.  
1801 Park Court Place, B-103  
Santa Ana, CA 92701

RE: Mt. San Antonio College 2018 Educational & Facilities Master Plan TIA & Draft EIR Peer Review  
19-0122

Dear Mr. Holm:

**INTRODUCTION**

Ganddini Group, Inc. is pleased to provide this peer review summary for the Mt. San Antonio College 2018 Educational & Facilities Master Plan in the City of Walnut. We have reviewed the following documents:

- *Traffic Impact Analysis for Mt. San Antonio College Long Range Development Plan 2018 Educational and Facilities Master Plan*, Psomas, March 2019 (“2018 EFMP TIA”)
- Section 4.14 Transportation/Traffic of the *Mt. San Antonio College 2018 Educational and Facilities Master Plan Draft Environmental Impact Report*, Psomas, April 2019 (“Draft EIR Transportation Section”)

The documents have been reviewed for accuracy of the technical content presented and consistency with local traffic engineering/transportation planning standards. The 2018 EFMP TIA is generally consistent with previous studies in terms of study locations and methodologies. This primary focus of this peer review is the project impact on City of Walnut facilities. We offer the following comments.

**2018 EFMP TIA REVIEW**

Comment 1

Page 1 – Introduction. This section offers a summary of certain projects that have been evaluated in previous project-specific level environmental documents. The 2018 EFMP estimates student headcount growth from 37,864 students in fall 2017 to between 40,802 to 42,745 students in fall 2027 based on medium and high growth estimates. The 2018 EFMP TIA evaluates impacts associated with the high growth estimate of 1.22 percent per year, resulting in a projected net increase of 4,881 students in fall 2027.

It is noted that the current student headcount projections are slightly lower than past projections. The *Mt. SAC 2015 Facilities Master Plan Update & Physical Education Projects Traffic Impact Study* (Iteris, September 2016) was based on fall 2014 enrollment of 35,986 students and projected increase of 7,153 students by year 2025, resulting in a total headcount of 43,139 students by year 2025.

17

Comment 2

Page 7/8, Section 1.2 – Analysis Methodology. The analysis methodologies and thresholds of significance described are consistent with those utilized by the City of Walnut; however, the report does not provide Level of Service (LOS) definitions for the Intersection Capacity Utilization (ICU) and Highway Capacity Manual delay methodologies. Although this does not affect the findings of the report, it is common practice to include LOS definitions a traffic impact analysis report.

18

Comment 3

Section 2 – Existing Study Area Conditions. Ganddini Group has reviewed the roadway descriptions and traffic volumes. Roadway descriptions appear to be accurate; however, there is no exhibit illustrating existing intersection traffic controls and lane configurations, as is commonly included in traffic impact analysis reports.

19

Intersection turning movement counts were collected on May 9, 2018 (except for two intersections in Pomona which were collected in October 2018). Mt. San Antonio College appears to have been in normal spring session during this time.

Comment 4

Figure 4A/B. Several of the existing intersection turning movement volumes are inconsistent with the count worksheets included in Appendix A of the 2018 EFMP TIA. These inconsistencies carry over to the Level of Service analysis and should be corrected as necessary. Attachment A of this peer review includes redlines of the intersection volumes that do not match the count worksheets.

20

Comment 5

Section 3 – Project Description. This section provides a detailed summary of parking/circulation, bicycle, and pedestrian recommendations included in the 2018 EFMP. Key components include two new parking structures in Phase 1A (PS-R and PS-S) off Bonita Drive, south of Temple Avenue and two new parking structures in Phase 2 (PS-B off Grand Avenue/San Juan Hills Road and potentially PS-F off Bonita Drive, north of Temple Avenue). Bicycle lanes are proposed along Temple Avenue/Amar Road. A “Healthy Living Loop” is proposed to circumvent the campus and run adjacent to portions of Temple Avenue and Grand Avenue.

21

Roadway circulation improvements associated with EFMP construction are listed on pages 22 and 23. In summary, these include improvements associated with campus access such as traffic signal at Temple Avenue/Transit Center access and eastbound and westbound right turn lanes at Temple Avenue/Bonita Drive.

Comment 6

Section 4.1.1. Project Trip Generation. Project trip generation was determined based on trip generation rates from the Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017) for land use category 540 – Junior/Community College. Project trip generation for interim year 2021 was calculated for 1,882 additional students. The trip generation calculations are accurate and consistent with standard practice.

22

Comment 7

Section 4.1.2. Project Trip Distribution. No description or supporting data for the project trip distribution forecasts are provided. The project trip distribution patterns are comparable to previous studies; however, slightly lower percentages of project trips are distributed westerly into City of Walnut. For example, the *Mt. SAC 2015 Facilities Master Plan Update & Physical Education Projects Traffic Impact Study* showed 14% of project trips along Amar Road (compared to 10% in 2018 EFMP TIA), 6% along La Puente Road (compared to 1% in 2018 EFMP TIA), and 4% along Valley Boulevard (compared to 1% in 2018 EFMP TIA).

23

Comment 8

Figure 10A/B. Project trip assignment appears to be accurate based on spot checks and sum of inbound/outbound trips at the campus access points.

24

Comment 9

Section 4.1.4 Related Project Traffic Volumes. Table 5 shows a summary of trips generated by other planned development projects in the study area. Related projects are listed in Table 4 (Projects #5-12 include City of Walnut development projects). It is common practice for a traffic impact analysis report to include additional details showing the number of trips generated by each other development project. Related project trip generation calculations could not be checked since only the total number of trips is shown.

25

Comment 10

Section 4.1.5 Cumulative Traffic Volumes [Year 2021]. In addition to related projects, an annual growth rate of 0.5% was applied for interim year 2021 conditions (see page 35). This is consistent with growth factors contained in the Los Angeles County 2010 Congestion Management Program and other traffic studies prepared for projects in the City of Walnut.

26

Comment 11

Section 4.2.1 Project Trip Generation. Project trip generation was determined based on trip generation rates from the Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017) for land use category 540 – Junior/Community College. Project trip generation for buildout year 2027 was calculated for 4,881 additional students. The trip generation calculations are accurate and consistent with standard practice.

27

Comment 12

Section 4.2.4 Cumulative Growth [Year 2027]. Buildout year (2027) with project volumes were developed by applying an annual growth rate of 1.0% per year to existing volumes. To develop buildout year without project volumes, project-generated trips were subtracted from buildout year (2027) with project volumes and adjusted as necessary where project growth was greater than the annual growth rate. This forecasting method can result in some cases where intersection performance appears to improve compared to interim year 2021 conditions, as noted below. The EFMP TIA notes that the growth rate was discussed with the City of Walnut traffic engineer; however, it is unclear why the annual growth rate of 0.5% used for interim year 2021 was not simply extended to year 2027 with inclusion of related projects.

28

Comment 13

Figure 16A/B. There appears to be cases where intersection volumes for buildout (2027) cumulative conditions are lower than year 2021 cumulative conditions (see Intersection #7 – Temple Avenue/Bonita Drive). The buildout (2027) volumes should be reviewed and revised as necessary to ensure traffic growth over year 2021 cumulative conditions.

29

Comment 14

Section 5.0 Operational Analysis – Existing Year (2018). The ICU/delay tables for existing and existing plus project conditions (and all other analysis scenarios) have been reviewed and determined to be consistent with the supporting calculation worksheets provided in Appendix B of the 2018 EFMP TIA. The recommended mitigation measure improvements are generally consistent with findings of the City of Walnut General Plan, with the following exceptions/notes:

- #4 Temple Avenue and Grand Avenue: The recommendation to convert the westbound right turn lane to a shared thru-right turn lane may not be feasible as there is only approximately 250 feet on the receiving west leg where a third through lane can be accommodated through re-striping. This improvement is not consistent with the City of Walnut General Plan.
- #23 San Jose Hills Road and Grand Avenue: The recommendation to convert the northbound right turn lane to a share thru-right turn lane may require elimination of the existing bicycle lane on the northbound receiving leg. This intersection was not studied in the City of Walnut General Plan.
- #24 La Puente Road and Grand Avenue: The City of Walnut General Plan identifies one additional northbound and one additional southbound through lanes at this intersection that are not identified as necessary mitigation for the 2018 EFMP.

30

Comment 15

Section 6.0 Operational Analysis – Interim Year (2021). Page 64 – similar comment regarding mitigation at study intersection #4 – Temple Avenue and Grand Avenue. The 2018 EFMP would result in a significant and unavoidable impact at the intersection of Valley Boulevard and Grand Avenue during the AM peak hour.

31

Comment 16

Table 11 - Buildout (2027) Cumulative Plus Project Impacts Analysis. The following intersections show a decline (e.g., improvement) in ICU/delay operations compared to 2021 cumulative conditions and should be revised as necessary:

- #7 Temple Avenue/Bonita Drive (AM peak hour)
- #8 Temple Avenue/Lot F (AM peak hour)
- #18 Holt Avenue/Grand Avenue (PM peak hour)
- #19 Cortez Street/Grand Avenue (PM peak hour)
- #21 Cameron Avenue/Grand Avenue (PM peak hour)
- #22 Mountaineer Road/Grand Avenue (AM peak hour)
- #23 San Jose Hills Road/Grand Avenue (AM peak hour)

32

Comment 17

Section 7.5 Mitigation Measures [Buildout 2027]. The mitigation at Amar Road/Nogales Street (#1) recommends converting the eastbound right turn lane to a shared thru-right turn lane, in addition to the City of Walnut General Plan identifies addition of a second westbound left turn lane since the eastbound right turn volume currently exceeds 500 trips during the AM and PM peak hours. Mitigation at Temple Avenue/Mt. SAC Way (#5) to convert westbound right turn lane to a thru-right turn lane. Significant and unavoidable impacts are identified to occur at the following locations:

- #3 Amar Road/Meadow Pass Road (AM peak hour)
- #4 Temple Avenue/Grand Avenue (AM/PM peak hours)
- #22 Mountaineer Road/Grand Avenue (PM peak hour)
- #25 Valley Boulevard/Grand Avenue (AM/PM peak hours)

Project fair share contribution, as a percentage of new traffic, is shown on Table 13 (page 79) for the significantly impacted intersections where mitigation measure improvements could be identified. Dollar amount cost estimates for the identified improvements are not included.

Comment 18

Appendix B – ICU Spreadsheets and HCM Reports. The ICU calculations utilize the appropriate lane capacity and loss time parameters used by City of Walnut. It is unclear how the overlap reduction was determined. The report should clarify.

It is also difficult to check the analysis volume since the total volume shown in the worksheet appears to be the baseline volume with the peak hour factor applied. It is unusual to apply peak hour factors in ICU analysis, although doing so results in a more conservative analysis. Additionally, when peak hour factors are applied for Level of Service analysis, the Highway Capacity Manual recommends the average peak hour factor for the overall intersection should be applied as opposed to the individual peak hour for each approach.

As previously noted, Figure 4A/B – Existing Traffic Volumes is inconsistent with the existing count worksheets. The ICU/delay analysis volumes should be verified and revised as necessary.

**DRAFT EIR TRANSPORTATION SECTION**

The findings in the Draft EIR Transportation Section are generally consistent with the findings of the 2018 EFMP TIA, with exception of the following comments.

Comment 19

Page 4.14-2 provides a qualitative discussion of the Project’s impact on vehicle miles travelled (VMT) in relation to Senate Bill 743. The evaluation assumes that enhanced transit services and project density will reduce overall VMT. Without quantitative analysis, it may be presumptuous to assume that VMT will decrease while simultaneously planning for increases in parking capacity. It is noted that compliance with SB 743 VMT analysis is not required until July 1, 2020.

Comment 20

Table 4.14-3. Significant impact evaluation does not apply to this scenario (Existing Traffic Conditions). The corresponding references for Footnotes 1 and 2 are not shown.

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Mr. Thomas Holm, Senior Environmental Planner  
ECORP CONSULTING, INC.  
May 13, 2019

Comment 21

Table 4.14-7 through Table 4.14-12. The tables should include an additional column showing the project-related change in delay or V/C.

Comment 22

Page 4.14-35 – Threshold 14.2. Same as Comment 19.

Comment 23

Page 4.14-37, first paragraph under 4.14.6 Cumulative Impacts. Reference to Existing Plus Project conditions should be removed since it is not a cumulative scenario.

Comment 24

Section 4.14.7 Mitigation Measures. Same comments with respect to mitigation measures as noted in the 2018 EFMP TIA review. On page 4.14-39, Mountaineer Road and Grand Avenue should be removed since there are no improvements identified for this intersection.

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**CONCLUSION**

Overall, the 2018 EFMP TIA generally follows established transportation planning standards for the area and is reasonably accurate, with the exception of comments noted above. Revisions in response to Comments 4, 12, 13, 16, 17, and 18 have the potential to alter the findings of significance and/or recommended mitigation measures. Therefore, it is recommended that the 2018 EFMP TIA be revised as appropriate.

Some of the comments noted above may include typographical and labeling errors; however, this was not the primary focus of the review and others may exist.

We appreciate the opportunity to assist you on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100.

Sincerely,

GANDDINI GROUP, INC.

Giancarlo Ganddini, PE, PTP  
Principal



**ATTACHMENT A**

**Traffic Volume Data Redlines**

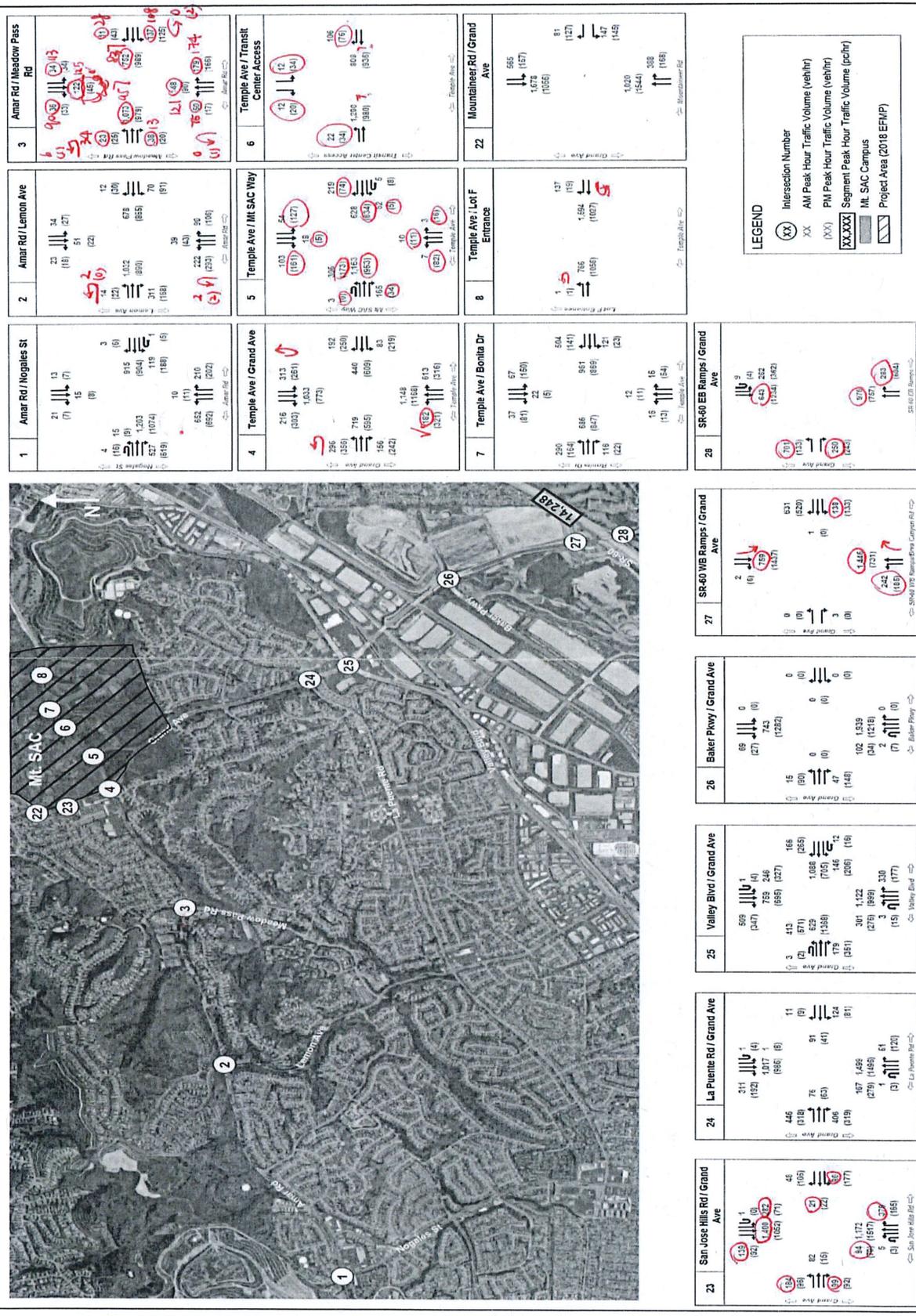
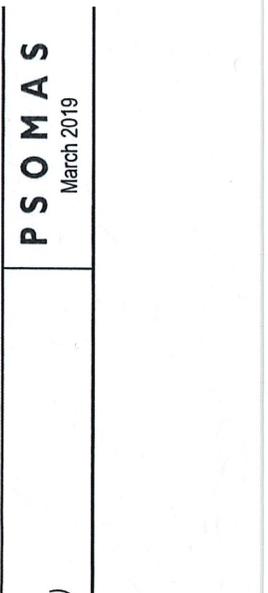
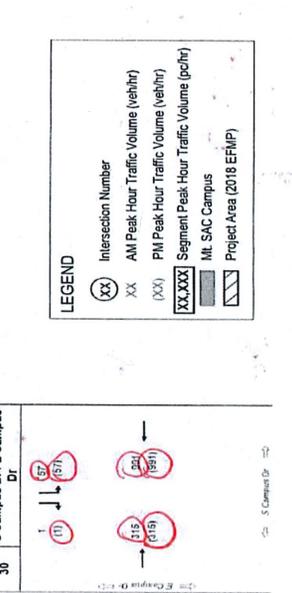
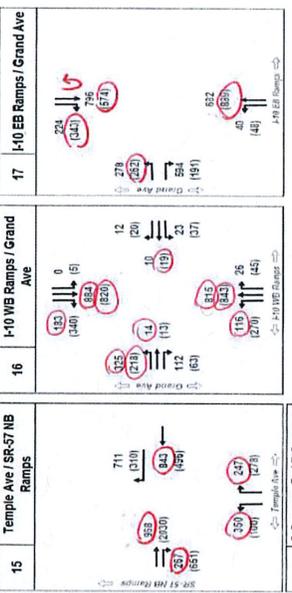
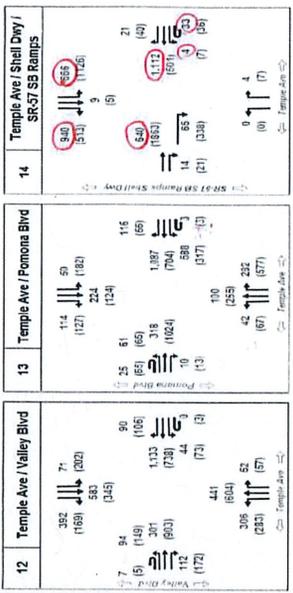
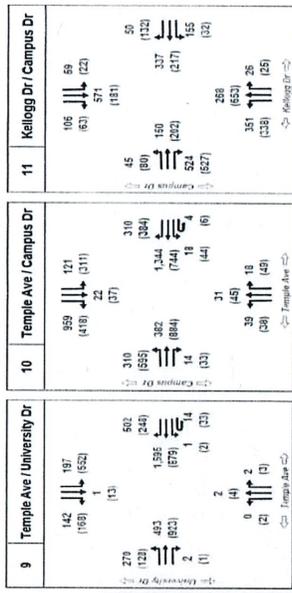
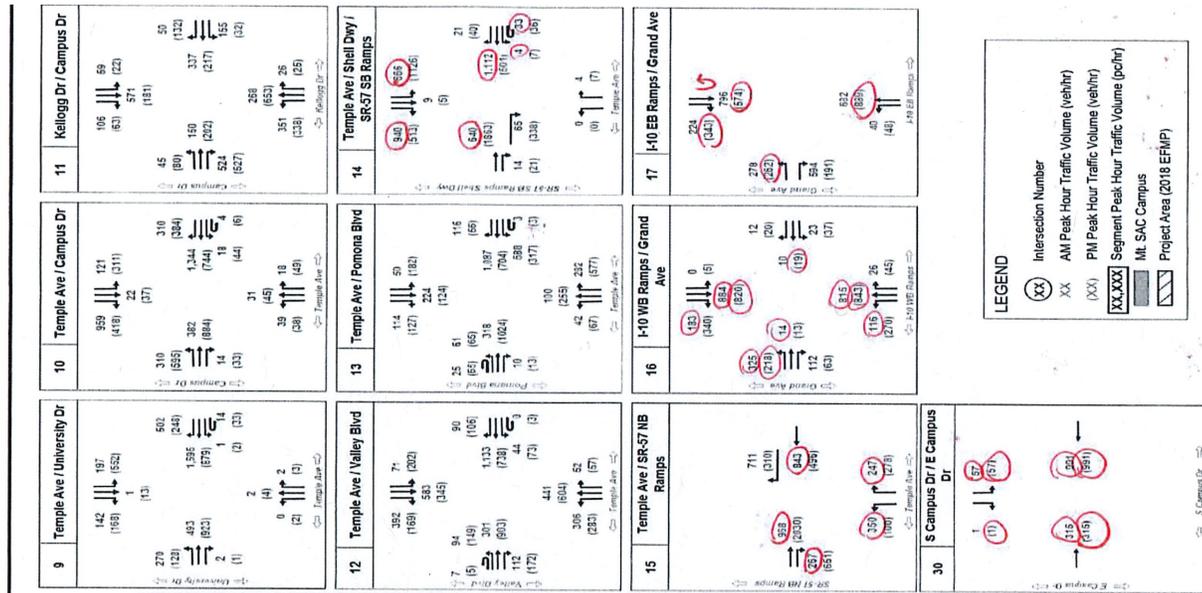


Figure 4A. Existing Traffic Volumes (Intersections 1-8, 22-28)

Traffic Impact Analysis  
Mt. San Antonio College  
2018 EFMP



**LEGEND**

- Intersection Number
- AM Peak Hour Traffic Volume (veh/hr)
- PM Peak Hour Traffic Volume (veh/hr)
- Segment Peak Hour Traffic Volume (veh/hr)
- Mt. SAC Campus
- Project Area (2018 EFMP)

**PSOMAS**  
March 2019

Figure 4B. Existing Traffic Volumes (Intersections 9-21, 29-30)

Traffic Impact Analysis  
Mt. San Antonio College  
2018 EFMP

# **ATTACHMENT 2**

## **ECORP Consulting Inc. 2018 EFMP DEIR Comment Matrices**

**ENVIRONMENTAL SUMMARY MATRIX**

**ATTACHMENT B – AIR QUALITY AND GREENHOUSE GASES COMMENTS**

Comment Number	Section	Comment – Air Quality
1	General Comment	<p>ECORP Consulting, Inc. (ECORP) has reviewed the Air Quality Section of the Mt. San Antonio College 2018 Educational and Facilities Master Plan Draft EIR and has the following comments, which are provided with an emphasis on the document's compliance with applicable standards and regulatory compliance measures, as well as its consistency with current industry standards of practice.</p> <p style="text-align: right;"><b>41</b></p>
2	Impact Analysis – Threshold 2.1	<p>The impact discussion states that Project Phase 2 cannot be quantified for construction emissions as it is too speculative to do so. However, Table 3-1 of the Project Description provides a detailed summary of the specific amount of construction, renovation, and demolition associated with Phase 2. Based on the information provided in Table 3-1, Phase 2 should be able to be modeled for construction emissions. A worst-case scenario could be developed to address construction timing.</p> <p style="text-align: right;"><b>42</b></p>
3	Impact Analysis	<p>OR, a robust explanation as to why Phase 2 is too speculative to model for construction emissions should be provided. [See Comment 4 for related comment].</p> <p>The first paragraph under Table 4.2-5 states NOx emissions are exceeded during construction in the year 2019. This sentence should be clarified to state that NOx emission will also be exceeded in the year 2020.</p> <p style="text-align: right;"><b>43</b></p>
4	Impact Analysis	<p>The first paragraph under Table 4.2-5 states that even though Phase 2 construction emissions were not modeled [as they are too speculative to do so], Phase 2 construction emissions would nonetheless be less than Phase 1A and 1B emissions. This argument makes up the basis for considering Phase 2 construction emissions less than significant. This argument is not adequate under CEQA. Phase 2 construction emissions need to be quantified and compared to the significance thresholds before being determined to be less than significant.</p> <p>OR, if Phase 2 construction emissions are too speculative to quantify, and a robust explanation as to why is articulated, then programmatic mitigation is required to mandate a CEQA level analysis at the time of Phase 2 implementation. Even with this mitigation, it</p> <p style="text-align: right;"><b>44</b></p>

**ENVIRONMENTAL SUMMARY MATRIX ATTACHMENT B – AIR QUALITY AND GREENHOUSE GASES COMMENTS**

Comment Number	Section	Comment – Air Quality
5	Impact Analysis	<p>cannot be guaranteed that future, speculative Phase 2 construction emissions would be less than significant, and a significant and unavoidable conclusion would have to be reached. The only way to adequately state Phase 2 construction emissions are less than significant, is to model this activity and compare the quantified emissions to the significance thresholds.</p> <p>As shown in Table 3-1, 405,023 square feet of building space would be renovated, and it does not appear as though emissions from renovation activity have been calculated. While it is acknowledged that CalEEMod does not contain a renovation tab, the model can be adjusted to provide a reasonable though conservative estimate from renovation activity. CalEEMod defaults will account for the construction worker commutes associated with renovation. Emissions from the renovation of 405,203 square feet of building space should be calculated and disclosed. The methodology in which this was completed should be disclosed.</p>
6	Impact Analysis	<p>At the bottom of page 4.2-21 it is stated that the Project would generate 5,613 trips daily, but no reference is provided.</p>
7	Impact Analysis	<p>Page 3-22 of the Project Description states that the 2018 EFMP (Project) encapsulates Phases 1A, 1B, 2, and the components of the 2016 EFMP that have not yet been implemented. The impact discussion seems to address Phases 1A, 1B, and 2 only, and it should be confirmed that the components of the 2016 EFMP that have not yet been implemented are included in the emissions modeling and analysis. If the unrealized components of the 2016 EFMP are not part of the Project, then page 3-22 of the Project Description should be revised.</p>
8	Impact Analysis	<p>The last paragraph of the impact discussion, on page 4.2-23, is confusing and requires clarification to support the conclusion that the Project is consistent with the growth projections contained in the 2016 Air Quality Management Plan. This paragraph should</p>

**ENVIRONMENTAL SUMMARY MATRIX ATTACHMENT B – AIR QUALITY AND GREENHOUSE GASES COMMENTS**

Comment Number	Section	Comment – Air Quality
9	Recommendations Summary	<p>be revised to clearly explain how the growth allowed under the proposed 2018 EFMP is consistent with the growth anticipated in the Air Quality Management Plan.</p> <p>-Quantify emissions associated with Phase 2 construction.</p> <p>-Develop a conservative methodology and quantify emissions associated with renovation as accurately as possible. Note the difficulty in quantifying renovation-generated emissions and spell out the method in the EIR section.</p> <p>-Input modeling specifications consistent with the information provided in Table 3-1.</p> <p>-Confirm that <i>the components of the 2016 EFMP that have not yet been implemented</i> are analyzed (if indeed a part of the Project) and so note in the EIR.</p> <p>-Produce a modeling output file for use at Appendix C1 as a .pdf directly.</p>
10	<b>GREENHOUSE GASES</b>	<b>Comment – Greenhouse Gases</b>
11	General Comment	<p>ECORP Consulting, Inc. (ECORP) has reviewed the Greenhouse Gas Emissions Section of the Mt. San Antonio College 2018 Educational and Facilities Master Plan Draft EIR and has the following comments, which are provided with an emphasis on the document's compliance with applicable standards and regulatory compliance measures, as well as its consistency with current industry standards of practice.</p>
12	Section 4.7.3 Methods	<p>The first sentence under this header states that <i>existing</i> and proposed 2018 EFMP GHG emissions were calculated by using CalEEMod. However, Table 4.7-2, <i>Estimated Existing Annual Greenhouse Gas Emissions</i>, sources the Mt. SAC 2018 Climate Action Plan. Therefore, it appears as though <i>existing</i> GHG emissions are cited from the Climate Action Plan rather than calculated with CalEEMod.</p>

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**ENVIRONMENTAL SUMMARY MATRIX ATTACHMENT B – AIR QUALITY AND GREENHOUSE GASES COMMENTS**

<b>Comment Number</b>	<b>Section</b>	<b>Comment – Air Quality</b>
13	Table 4.7-2	This Table contains a reference to "Mt. SAC 2018" yet subsection 4.7.9, <i>References</i> , includes citations to "Mt. SAC 2018a" and "Mt. SAC 2018b". The Table 4.7-2 reference needs to be clarified. <span style="float: right;">52</span>
14	Threshold 6.1	The 4 <sup>th</sup> paragraph of this impact discussion states that operational emissions assume a 2022 buildout of Phases 1A and 1B. This is inconsistent with Section 4.2 Air Quality, where operational emissions of Phases 1A, 1B, and 2 are quantified. The modeling conducted, and buildout scenario analyzed, for the Greenhouse Gas Emissions Section should be consistent with the Air Quality Section. <span style="float: right;">53</span>
15	Threshold 6.1	The analysis seems to piecemeal the Project by evaluating individual components separately, and not the Project as a whole. This is inadequate under CEQA as the whole of the Project must be analyzed. This impact discussion should be revised in a manner that the entire Project is compared to the significance threshold. <span style="float: right;">54</span>
16	Threshold 6.2	The last paragraph on Page 3-22 states that the Project would reduce emissions consistent with AB 32, yet provides no evidence for this. This sentence should be removed as the Project will increase emissions, not reduce them. <span style="float: right;">55</span>
17	Recommendations Summary	<p>Quantify GHG emissions consistent to the method employed for the Air Quality Section.</p> <ul style="list-style-type: none"> <li>-Develop a conservative methodology and quantify emissions associated with renovation as accurately as possible. Note the difficulty in quantifying renovation-generated emissions and spell out the method in the EIR section.</li> <li>-Input modeling specifications consistent with the information provided in Table 3-1.</li> <li>-Confirm that <i>the components of the 2016 EFMP that have not yet been implemented</i> are analyzed (if indeed a part of the Project) and note so in the EIR.</li> <li>-Do not piecemeal the analysis by determining significance of Project components individually. Revise Threshold 6.1 to analyze the entire Project as a whole.</li> </ul> <span style="float: right;">56</span>

**ENVIRONMENTAL SUMMARY MATRIX**

**ATTACHMENT B – AIR QUALITY AND GREENHOUSE GASES COMMENTS**

**Comment Number**      **Section**

**Comment – Air Quality**

-Compare emissions generated by the whole of the Project to South Coast AQMD's efficiency-based threshold as opposed to the bright-line numeric threshold. This threshold is more appropriate for the scale of the Project and has the additional benefit of covering the post-2020 regulatory environment (State goals under Senate Bill 32) since it provides a 2020 threshold and 2035 threshold.

-The Mt. SAC Climate Action Plan (CAP) seems fairly robust, and thus recommend in analyzing the Project for CAP consistency under Threshold 6.1. Essentially, swap Threshold 6.1 with 6.2.

It is recommended that the discussion of CAP consistency be expanded to describe how CAP strategies/practices are programmed. For instance, page 4.7-23 notes that the CAP requires the college to reduce energy consumption from the 2014 baseline by 20 percent by the end of 2020, 50 percent by 2035, and 100 percent by 2050. If it could be explained more specifically how Mt. SAC plans to implement these targets, the analysis would benefit, as this CAP policy provision is quite robust.

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cont.

**ENVIRONMENTAL SUMMARY MATRIX**

**ATTACHMENT C – BIOLOGICAL RESOURCES**

Comment Number	Section	Comment – Biological Resources
1	General Comment	<p>ECORP Consulting, Inc. (ECORP) has reviewed the biological sections of the Draft EIR to determine if appropriate standard methods and applicable agency protocols were used to complete the studies. Conclusions, impact significance thresholds, recommendations, and mitigation measures were also reviewed for technical requirements and to determine if they are in conformance with CEQA guidelines. Identified mitigation measures recommended to avoid potential impacts or reduce them to a less than significant level will be reviewed.</p> <p style="text-align: right;">57</p>
2	General Comment	<p>It should be noted there was no General Biological and Sensitive Species Assessment report included in the Appendices with this Master Plan Update. It appears the last campus-wide Biological Technical Report was prepared in April 2016 to support the Mt. SAC 2015 Facilities Master Plan Update and Physical Education Projects (PEP) Subsequent Program/Project EIR (SEIR). Please explain why an updated biological resources and sensitive species report was not prepared to inform the campus-wide environmental baseline.</p> <p style="text-align: right;">58</p>
3	General Comment -- Adequacy of Methods and Protocols	<p>Methods identified that were used for the surveys are considered to be adequate based on the nature of the projects, involving redevelopment and development within mostly disturbed plant communities.</p> <p style="text-align: right;">59</p>
4	General Comment – Adequacy of Methods and Protocols	<p>The list of Thresholds of Significance for biological resources (p. 4.3-21) should be updated to reflect recent changes to this portion of Appendix G. This also applies to the individual thresholds listed under Section 4.3.4, within the heading boxes.</p> <p style="text-align: right;">60</p>
5	General Comment – Impact Analysis	<p>In general, the impact analysis sufficiently and succinctly identifies impacts and presents their significance under CEQA.</p> <p style="text-align: right;">61</p>
6	General Comment – Impact Analysis	<p>The impact to Walnut Woodland is discussed under Threshold 3.2, which connotes a “substantial adverse effect” on a “sensitive natural community.” However, in the impact analysis the impact to Walnut Woodland fails to mention that the impact specifically is considered significant.</p> <p style="text-align: right;">62</p>

**ENVIRONMENTAL SUMMARY MATRIX**

**ATTACHMENT C – BIOLOGICAL RESOURCES**

**Comment Number**

7

**Section**

Mitigation Measures

**Comment – Biological Resources**

Mitigation Measure BIO-1 should only apply to Intermediate Mariposa Lily, but the wording of the measure is vague and possibly misleading to apply to more plant species. The measure should be re-worded to apply only to that one species of lily, with a specific blooming period of May through July.

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Conclusions/Recommendations

The Biological Resources section adequately identifies impacts for the project under CEQA, and provides adequate mitigation for biological resources impacts to reduce them to below a level of significance. Recommendations are:

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- Update the Thresholds of Significance according to the latest version of Appendix G
- Update Mitigation Measure BIO-1 to be more specific to Intermediate Mariposa Lily

# **ATTACHMENT 3**

Fully Executed Memorandum of Agreement (MOA)

## MEMORANDUM OF AGREEMENT

### I. Parking Structure:

1. Remove multi-level Parking Structure location at Lot A by eliminating it from Master Plan, no later than the next Master Plan Update. Surface parking allowed.
2. Mt. SAC agrees that any parking structure shall maintain a setback of no less than 400 feet from the nearest single family residential property line and that Mt. SAC will "meet and confer" with the City to evaluate the potential impacts of the parking project on nearby residents.
3. Mt. SAC agrees it will consider the location of a parking project near the Mt. SAC Transit project. Mt. SAC agrees to evaluate the benefits of prioritizing the siting of future parking structures in proximity to the Transit Center and along Temple Avenue.
4. The City and Mt. SAC will equally share in the cost of completing the sidewalk north of Grand and San Jose. In the event the City elects not to participate in the cost of completing the sidewalk, Mt. SAC will have no obligation under this Section I.4.

### II. West Parcel:

1. Mt SAC will agree to remove the current Board approved Solar Project from the Master Plan and record a restrictive covenant against the West Parcel that prohibits use of the West Parcel to construct, build or install ground-mount solar panels or other stand-alone energy project with impacts similar to a ground-mount solar farm. Mt. SAC and the City agree that the restrictive covenant will have provisions for reasonable standards for any other stand-alone energy project or facility with exposed energy-generating components; provided, however, Mt. SAC may conform to applicable DSA code requirements as amended from time to time without City approval.
2. Any future proposed temporary or permanent use or project planned for development on the West Parcel Site shall be reviewed and processed by Mt. SAC in conformance with Section IV below and all applicable law.
3. The City agrees Mt. SAC may deposit approximately 140,000 cubic yards of dirt on the West Parcel Site in connection with the construction of the Stadium PEP project described in Section III below ("Earthwork") no earlier than September 2018 subject to (a), (b), and (c), below.
  - a) The West Parcel Earthwork and hauling operations shall be conducted in accordance with City reviewed and approved plans. The City agrees to process the grading plans, including proposed haul route and traffic

## MEMORANDUM OF AGREEMENT

control plans for the West Parcel Site and Stadium PEP project consistent with the applicable requirements of the Walnut Municipal Code Title II, Chapter 6. Notwithstanding the foregoing, the City agrees to submit the grading and hauling plans for the West Parcel directly to the City Council with the City Engineer's recommendation concurrent with the City Council's consideration of the complete and final settlement agreement. The complete and final settlement agreement will be conditioned on expiration of the time to appeal the City Council decision approving the grading plans for the Earthwork. Mt. SAC will continue to export the first 140,000 cubic yards of earth from the PEP project to sites in the cities of Chino and/or Ontario. Mt. SAC will submit a revised truck hauling plan.

- b) Mt. SAC will incorporate contouring and landscaping elements that create rolling pasture lands that are visually appealing and environmentally friendly. Renderings previously prepared and submitted by Mt. SAC show conceptually how Mt. SAC intends to contour and landscape the pad with swales, mounds, slopes, and trails to create rolling pasture lands. The contouring will result in elevation changes of  $\pm$  five feet to achieve the desired pasture-like effect.
  - c) Mt. SAC may build a temporary access road for the West Parcel Site as reasonably necessary for the Earthwork and a secured permanent access road as reasonably necessary for maintenance.
4. Mt. SAC does not intend at this time to undertake any additional CEQA review for the Earthwork and contouring/landscaping work on the West Parcel site.

### **III. Stadium (PEP) Project:**

- 1. The City agrees to not oppose the construction of the Stadium PEP. The City agrees the grading application submittals for the PEP is complete as of 5:00 pm April 7, 2018 and that the City will exercise its best efforts to complete the plan check review at the earliest possible time. Mt. SAC has paid applicable application fees and will remit payment for engineering fees promptly upon invoice from the City.
- 2. Mt. SAC will indemnify/reimburse the City for damage to City roads arising from earthmoving truck hauling through identified and adopted mitigation measures supporting the SEIR. City does not waive any claims for additional damages.
- 3. Mt. SAC will agree to formation of a Stadium task force to include City and Mt. SAC representatives to discuss partnering opportunities.
- 4. Mt. SAC will agree to process requests by the City to use the Stadium by applying the published policies and procedures for fees and schedules for municipalities located within its geographical boundary.

## MEMORANDUM OF AGREEMENT

### **IV. Future Projects:**

1. For commencement and/or implementation of either Master Plan projects or Master Plan Updates (MPU) and adoption of any Government Code section exemption (including but not limited to section 53091 and 53094), written notice to the City shall be given at the earliest time that Mt. SAC issues either its Request for Qualifications (RFQ) or Request for Proposals (RFP) for any architect or design or other consultant or contractor; but in no event later than 30-days prior to Mt. SAC's publication of the agenda for the items listed above.
2. The City and Mt. SAC will "meet and confer" on substantive planning and development projects that impact both parties. These matters include, but are not limited to: (i) Mt SAC projects proposed under the 2018 Facilities Master Plan Update and Facility Master Plan updates; (ii) future Mt. SAC projects; (iii) updates to the City's General Plan; (iv) City zoning changes affecting the Mt. SAC campus, and (v) City long range development plans. The purpose is for Mt. SAC and the City to work together to review planning and projects that affect both parties and to discuss planning and project implementation at the earliest stages. The "meet and confer" process will start with the City's City Manager or his/her designee, and Mt. SAC's President/CEO, or his/her designee, with reasonable follow-up by staff, as the City Manager and the President/CEO, or designee(s), may decide and subject to City Council and Board of Trustees approval.
3. The City agrees that Mt. SAC has its own MS4 permitting authority under a statewide permit. The City further agrees that its authority to review and approve grading plans for all future Mt. SAC exempt educational facilities will be administrative review and approval of grading/drainage plans by the City's Building Official upon the submission of the complete grading application and such review and approval will be pursuant to technical design and construction standards of on-site improvements which affect grading and drainage.
4. Mt. SAC and the City will re-establish the quarterly committee (staff and elected representatives) meetings between Mt. SAC and the City to consult meet and confer on current events, projects, etc. Additional informal consultations/notifications between the City and Mt. SAC staff will be made prior to formal notice and publicity of new projects, events, etc. to allow for improved coordination.

### **V. Miscellaneous:**

1. Mt. SAC and the City agree to issue a joint press release or announcement once this Memorandum of Agreement is approved by its respective governing bodies.

## MEMORANDUM OF AGREEMENT

2. Mt. SAC's Board of Trustees is considering placing on the November 2018 general election ballot a Proposition 39 bond measure. The City agrees it will not submit any "argument against" the bond measure for publication in the voter pamphlet.
3. This Memorandum of Agreement shall be memorialized in a full settlement and mutual release agreement that shall include a stipulated judgment to be filed in pending litigation. The written settlement agreement shall contain a provision for judicial enforcement pursuant to CCP 664.6 along with a clause for prevailing party attorneys' fees.
4. Mt. SAC and the City will bear their attorneys' fees and costs with the exception Mt. SAC and the City agree the award of attorneys fees on appeal will be resolved by the appeal process.
5. The City will dismiss its pending lawsuits against Mt. SAC with both sides to bear their own fees and costs except as stated above in Section V.3. above.
6. The above terms are agreed to in principal and subject to approval of a formal and comprehensive written settlement agreement approved by the governing bodies of Mt. SAC and the City at a duly noticed meeting.

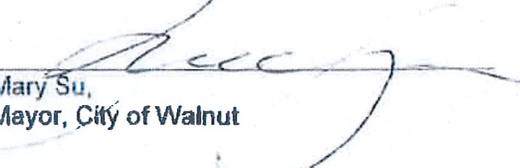
Date

April 2, 2018

  
\_\_\_\_\_  
Dr. Manuel Baca,  
President, Mt. SAC Board of Trustees

Date

April 10, 2018

  
\_\_\_\_\_  
Mary Su,  
Mayor, City of Walnut

APPROVED AS TO FORM:

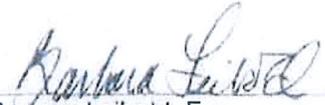
Date:

April 12, 2018

  
\_\_\_\_\_  
Sean Absher, Esq.  
Counsel for Mt. Sac and President Scroggins

Date

April 12, 2018

  
\_\_\_\_\_  
Barbara Leibold, Esq.  
Counsel for City of Walnut

**Letter**           City of Walnut  
                      Chris Vasquez  
                      May 22, 2019

### **Response to Comment Letter**

1. Commenter states that the Draft EIR lacks meaningful information regarding potential long-range projects post-2027 and potential cumulative effects of any future projects that may be contemplated by the District in Phase 3, and requests information concerning such projects and the assessment of their cumulative environmental effects.

The commenter is directed to Section 4.0 of the Draft EIR which presents an overview of the approach for the cumulative analysis. As noted on page 4-7 of the Draft EIR, the cumulative analysis did include consideration of Phase 3 of the proposed 2018 EFMP to the extent the information was applicable to the area of analysis. For example, as noted in Section 4.0 of the Draft EIR, there is no increase in the campus enrollment/headcount expected with implementation of the components of Phase 3; therefore, the traffic impact analysis did not account for Phase 3 improvements as part of the cumulative analysis.

Commenter is referred to page 1-5, which states that, “it is not anticipated that Phase 3 components of the proposed 2018 EFMP would be built during the 10-year horizon period; therefore, they are not being evaluated in this Draft EIR. Implementation of Phase 3 components of the proposed 2018 EFMP would be subject to separate environmental review pursuant to CEQA; however, they are considered in the cumulative impacts analysis in this Draft EIR and are described in Section 4.0, Introduction to the Environmental Analyses, of this Draft EIR.” (p. 1-5).

2. Commenter requests that MOA in Appendix A is substituted with a fully-executed copy. While Mt. SAC acknowledges that the MOA has been fully executed, CEQA does not require that an executed copy is attached to the Draft EIR.
3. Commenter states that the Draft EIR includes misstatements regarding the City’s pending Schools and Public Institutional (SPI) designation and ZCA/ZC for campus areas east of Grand Avenue. This comment is noted, but does not identify any specific misstatement that should be corrected. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
4. Commenter states that the zoning exemption under Government Code Section 53094(a) does not apply to Mt. SAC because the Zoning Map adopted as part of the Zoning Ordinance and the City’s General Plan both designate the location of public schools. Commenter requests that the related language on pages 1-2 and 1-3 be revised to reflect commenter’s position.

Government Code Section 53094, subdivision (a) states: “Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.” The City’s comment does not identify any municipal code section or zoning ordinance that makes provision for the location of public schools and confirms that the “Zoning Ordinance does not include the proposed SPI land use designation.” Under a plain reading of Section

53094(a) and based on the information provided in commenter's comment, no revisions will be made to the referenced language on pages 1-2 or 1-3.

Commenter states that the exemptions from the City's zoning ordinances under subsections (b) and (c) of Section 53094 are available to the District. This comment is noted.

5. Commenter states that the MOA is final and was approved by the City Council and Board of Trustees. Commenter also states that the MOA contemplates that the settlement will be further evidenced by a full settlement and release agreement. Commenter further states that the MOA established mutual understanding between the parties as to the West Parcel, Physical Education Project ("PEP"), parking structures, and future Mt. SAC projects.

Mt. SAC agrees that the MOA has been fully executed by the governing bodies of the City and Mt. SAC. Notwithstanding, the Draft EIR accurately states that there is no enforceable settlement agreement between Mt. SAC and the City, where a settlement agreement has not been finalized or approved by the governing body of either entity. (p. 1-3). Mt. SAC agrees that the MOA "established mutual understanding of the scope of work for the West Parcel, the Stadium (PEP) Project, parking structures, and future projects at Mt. SAC." (p. 1-2). There is no binding and enforceable settlement agreement between Mt. SAC and the City until such time as the respective governing bodies approve a final settlement and release agreement. Drafts of revised settlement agreements have been exchanged, but have not yet been approved.

6. Commenter notes that it appreciates references to provisions of the MOA and that the City Council will use legislative discretion in deciding whether to revise the proposed SPI and ZCA/ZC to conform to the MOA's 400-foot setback for parking structures adjacent to residential uses or to postpone this decision until the stipulated judgment is entered. This comment is noted; however, Mt. SAC wants to reiterate the MOA "established mutual understanding of the scope of work for the West Parcel, the Stadium (PEP) Project, parking structures, and future projects at Mt. SAC." (p. 1-2). There is no binding and enforceable settlement agreement between Mt. SAC and the City until such time as the respective governing bodies approve a final settlement and release agreement. Drafts of revised settlement agreements have been exchanged, but have not yet been approved.
7. The commenter requests that Table 3-5 of the Draft EIR includes in the City's Action items the review of grading and drainage plans for the West Parcel. In response to this comment, the following text has been added in Table 3-5 in the Action column for City of Walnut. New text is shown as **bold** and underline.

**Review of all grading and drainage plans for the West Parcel.**

The commenter also states that the City of Walnut General Plan (2018) is incorporated by reference (Section 15150) in its entirety and addressed in the Regulatory Setting environmental evaluation. This comment is factually accurate. (See Sections 2.4 and generally Sections 4.1–4.16).

The commenter also states that consistency with the General Plan is addressed in the impact analysis sections throughout the Draft EIR. This comment is noted.

8. The commenter states that the use limitations and allowable improvement activities associated with the West Parcel pursuant to the MOA are identified in the Draft EIR. This comment is factually accurate. (p. 4-9).

The commenter states that the type of environmental documentation for this future review is not indicated and that the Draft EIR should specifically acknowledge that any future use or site improvements on the West Parcel shall be subject to project level review in compliance with CEQA. The commenter is referred to page 4-9, which states that another use for the West Parcel in the future would be subject to environmental review, pursuant to CEQA and that any potential future development scenarios would be speculative. (p. 4-9). The commenter is also referred to page 3-18, which states that the “West Parcel Site Improvements have been evaluated in previous project level environmental documents pursuant to CEQA, and do not require further approval from the Mt. San Antonio Community College District Board of Trustees, [and] they are not being addressed as part of the recommended projects associated with the proposed 2018 EFMP in this Draft EIR.” (p. 3-18).

The commenter also notes the differences between the scope of the original West Parcel Solar project and the West Parcel Site Improvements project, and that any future use or improvement on the West Parcel must analyze and mitigate certain geotechnical issues and impacts on the portion of the West Parcel subject to a Restrictive Covenant in favor of the State of California. The commenter is referred to page 4-9, which states that another use for the West Parcel in the future would be subject to environmental review, pursuant to CEQA and that any potential future development scenarios would be speculative. (p. 4-9). The commenter is also referred to page 4.3-5, which states that the proposed 2018 EFMP does not involve any direct or indirect impacts to the West Parcel Solar project. (p. 4.3-5).

The commenter requests that references in the Draft EIR to the West Parcel Solar project should be deleted, but does not explain why. This comment is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration

The commenter also notes that Mt. SAC has stopped grading activities on the West Parcel since executing the MOA. The commenter is referred to page 4.3-5, which states that the 2018 EFMP does not involve any direct or indirect impacts to the West Parcel Solar project. (p. 4.3-5).

The commenter requests that references to the West Parcel Site Improvements project should be revised to reflect that Mt. SAC has stopped grading activities on the West Parcel since executing the MOA and to acknowledge that any future use or proposed site improvements to the West Parcel shall comply with all laws and the MOA. The commenter is referred to page 4-9, which states that another use for the West Parcel in the future would be subject to environmental review, pursuant to CEQA. (p. 4-9). The commenter is also referred to additional language on page 4-9, which states that “the MOA provides that Mt. SAC will not “construct, build or install ground-mount solar panels” on the West Parcel. Additionally, Mt. SAC will proceed with earthwork and hauling operations related to any project on the West Parcel that is consistent with the applicable requirements of the Walnut Municipal Code and construction of any access road.” (p. 4-9). The comment (or suggestion) that the MOA is a compliance document is incorrect. The MOA “established mutual understanding of the scope of work for the West Parcel, the Stadium (PEP) Project, parking structures, and future projects at Mt. SAC.” (p. 1-2). There is no binding and

enforceable settlement agreement between Mt. SAC and the City until such time as the respective governing bodies approve a final settlement and release agreement. Drafts of revised settlement agreements have been exchanged, but have not yet been approved.

The commenter notes that the Draft EIR refers to West Parcel Site Improvements work that was to begin in September 2017 and end in February 2019, and states that grading plan checks remain incomplete and that Mt. SAC will not pursue the previously proposed grading activities. The commenter requests that the Draft EIR be revised to reflect the current state of the West Parcel, reflect the current status of the scope of the West Parcel Site Improvements project, and reflect the updated construction timeline. The commenter is referred to page 3-18, which states that the “West Parcel Site Improvements have been evaluated in previous project level environmental documents pursuant to CEQA, and do not require further approval from the Mt. San Antonio Community College District Board of Trustees, [and] they are not being addressed as part of the recommended projects associated with the proposed 2018 EFMP in this Draft EIR.” (p. 3-18).

9. The commenter correctly states that the following on-campus projects—Transit Center, West Parcel, and Physical Education Complex—have been assumed as part of the cumulative analysis from a construction and operations perspective according to the methodologies discussed in the individual analysis sections of the 2018 EFMP Draft EIR. As noted throughout the 2018 EFMP Draft EIR, construction-related impacts related to air quality, noise, and traffic would all be less than significant or mitigated to less than significant levels.

Based on the example identified by the commenter with their restatement of mitigation measures TRA-3, TRA-4, and TRA-5, construction-related traffic impacts were considered in concert with the construction schedules of the other on-campus projects; construction traffic for each of these projects would also comply with mitigation measures to reduce construction traffic impacts through similar measures, including notification of the City of Walnut, coordinating for approval of hauling plan applications, and obtaining appropriate permits.

Additionally, it should be noted that the projects that have been analyzed at a program-level would be subject to future evaluation as site-specific designs are available to determine the appropriate level of additional project-level environmental documentation that is required. As part of this additional level of environmental review, the projects will be analyzed for cumulative impacts, as well.

10. As noted by the commenter and pursuant to Section 15064.7 of the State CEQA Guidelines, on May 11, 2016 Mt. SAC adopted the Mt. SAC 2016 CEQA Thresholds of Significance via Resolution No. 15-09. The Mt. SAC 2016 Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact’s level of significance. Thus, the Draft EIR does include a full listing of both the State CEQA Guidelines Environmental Checklist questions and the Mt. SAC 2016 Thresholds of Significance for the reader’s reference. This also ensures that the analysis is fully addressing both sets of thresholds and that all relevant topics are covered.
11. In response to comment 40 in the letter from the City of Walnut, the commenter correctly identifies that the intersection of Mountaineer Road and Grand Avenue should be removed

from MM TRA-1 since there are no improvements identified for this intersection. Additionally, there are no improvements identified for the intersection of Valley Boulevard and Grand Avenue. Therefore, in response to this comment, neither intersection would be subject to MM TRA-1 or MM TRA-2 requiring fair share contributions for intersection improvements. In response to this comment as well as comment 40 from the City of Walnut which is restated later in this response document, the following text has been modified, Section 4.14.6 Cumulative Impacts, on page 4.14-39. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

Cumulative traffic impacts consider the impacts of future growth and development in the City on the roadway system serving the Project area as well as non-vehicular transportation services. A detailed quantitative analysis of Project traffic impacts under General Plan and Project buildout conditions was discussed in Section 4.14.5, Environmental Impacts, Threshold 14-1. As identified in that analysis, the proposed Project would result in a significant and unavoidable cumulative impact under ~~Existing Plus Project Condition, 2021 Plus Project Condition and 2027 Plus Project Condition~~ at the intersections of Mountaineer Road and Grand Avenue and Valley Boulevard and Grand Avenue, ~~even with implementation of Mitigation Measures TRA-1 and TRA-2~~. In addition, the proposed Project would result in a significant and unavoidable cumulative impact under the 2027 Plus Project Condition at the intersections of Amar Road and Meadow Pass Road, even with implementation of Mitigation Measures TRA-1 and TRA-2. There is insufficient right-of-way to accommodate the required improvements at these intersections; therefore, the proposed Project would contribute to this cumulatively considerable traffic impact.

12. The EFMP Medium Growth Rate Alternative, discussed in the Draft EIR pages 5-13 through 5-22, together with the other alternatives considered in the Draft EIR, constitute a “reasonable range of potentially feasible alternatives” as required by CEQA Guidelines § 15126.6(a) in that it addresses the identified significant and unavoidable impacts. It is noted, however, that implementation of any build alternative that would support the proposed 2018 EFMP project objectives would result in a significant and unavoidable historical resource impact due to the need to impact Buildings 17, 18, 19A, 19B, and 20. Implementation of a low growth rate alternative would not be a feasible alternative for consideration by Mt. SAC as physical improvements associated with development of the proposed 2018 EFMP are intended to serve an increasing student population. An 0.18 percent growth rate would not sustain the proposed physical improvements associated with the 2018 EFMP. Additionally, the significant and unavoidable impact related to historical resources would not be reduced under the low growth rate alternative.
13. A mitigation monitoring plan (MMP) is not required to be circulated with the Draft EIR for public review. A complete listing of all proposed mitigation measures is included in Section 1.0, Executive Summary, of the Draft EIR. Due to the potential for changes to mitigation measures as part of the Final EIR process, the MMP will be considered for adoption along with the Final EIR by the Board of Trustees upon completion of the Final EIR.
14. The commenter states their support for the analysis as presented in the Draft EIR and confirms their interest in future involvement in the design and site selection process. No further response it required.

15. The comments listed in Attachment 1–Ganddini Group review were evaluated, and responses are provided below for each comment (responses 17-40).
16. The commenter is referencing the attached matrices for additional comments. No response is required.
17. Comment noted; no response is required.
18. In response to this comment, the first paragraph of the *Traffic Impact Analysis for Mt. San Antonio College Long Range Development Plan 2018 Educational and Facilities Master Plan* (“2018 EFMP TIA”) Section 1.2 Analysis Methodology has been revised. New text is shown as **bold** and underline. The table was also added as Table 1, and the other table numbers have been updated throughout.

Level of Service (LOS) is the typical measure used to characterize the quality of traffic operations at an intersection or roadway segment. LOS A represents relatively free operating conditions, whereas LOS F has unstable flow and congestion with volumes at or near the capacity of the facility. Excessive delays and queues can occur when the LOS is not acceptable. **Table 1 provides descriptions and thresholds for LOS A through LOS F for each intersection evaluation methodology used in this report.**

**Table 1. Intersection Level of Service Definitions**

Level of Service	Description	Intersection Volume to Capacity (V/C) Ratio/ICU Value	Signalized Intersection Delay (sec/veh)	Unsignalized Intersection Delay (sec/veh)
A	Primarily free-flow operation	0.000 - 0.600	≤10	≤10
B	Reasonably unimpeded operation	>0.600 - 0.700	>10 and ≤20	>10 and ≤15
C	Stable operation	>0.700 - 0.800	>20 and ≤35	>15 and ≤25
D	Less than stable conditions - small increases in flow may cause substantial increases in delay	>0.800 - 0.900	>35 and ≤55	>25 and ≤35
E	Unstable operation and significant delay	>0.900 - 1.000	>55 and ≤80	>35 and ≤50
F	Congested conditions, including flow at extremely low speed	>1.000	>80	>50

19. In response to this comment, 2018 EFMP TIA Figures 2A and 2B were created to show the existing intersection geometry and traffic control and were added to the traffic study immediately following Figure 2. In addition, the last paragraph of 2018 EFMP TIA Section 1.1 Study Area was revised. New text is shown as **bold** and underline.

Figure 2 shows the project vicinity and the study intersections as well as the two intersections included for evaluation as requested by Cal Poly Pomona. **Figures 2A and 2B show the existing intersection geometry and traffic control.**

20. The existing turning movement counts shown in Figure 4A/B are for the peak hours for the entire study area as opposed to the peak hours for each individual intersection. This

approach is more realistic because it includes volumes which are present on the network at a given peak time.

21. Comment noted; no response is required.

22. Comment noted; no response is required.

23. In response to this comment, the following text has been added as a new paragraph following the second paragraph under Project Trip Distribution (2018 EFMP TIA Section 4.1.2). New text is shown as **bold** and underline.

**The project trip distribution was based on the distribution in the PCMP and was updated based on the anticipated growth of surrounding areas and the location of parking structures.**

24. Comment noted; no response is required.

25. In response to this comment, additional calculation information has been added as Appendix B of the 2018 EFMP TIA, and the fourth paragraph of Section 4.1.4, Related Project Traffic Volumes has been updated as shown below. The new text is shown as **bold** and underline. The subsequent appendices have been re-numbered.

Table 5 shows the related project gross trips, pass-by and internal capture trips, replaced trips from existing developments, and the total new trips expected to be generated by the related projects in 2021. **Detailed calculations for each project are included in Appendix B.** As seen in the table, the related projects are expected to generate nearly 3,000 new daily trips, including 340 trips in the AM peak hour and 211 trips in the PM peak hour. Based on the trip generation and trip distribution for each of the projects, the resulting peak hour traffic volumes at each of the study intersections was calculated and are shown in Figures 12A and 12B.

26. Comment noted; no response is required.

27. Comment noted; no response is required.

28. As stated by the commenter, the conservative 1.0% per year growth rate for buildout year traffic was agreed upon with the City of Walnut traffic engineer and was therefore held as true. The 0.5% per year growth rate included on top of the related project growth for the 2021 projections as an additional conservative measure for the interim year analysis, which would otherwise only be based on the related projects. No further response is needed.

29. The commenter is correct that some of the 2027 without project volumes are lower than the 2021 without project volumes—this is due to the intentionally conservative volume projections for 2021 as discussed in the previous response. In addition, the SCAG projections show a decrease in traffic volumes through 2035, and the Los Angeles County 2010 CMP shows growth rates of 0.4% and 0.6% per year in the area (West Covina and Pomona, respectively) so the 1.0% annual growth rate is conservative. Lastly, with the projections as-is, the overall intersection volumes without the project are generally higher in 2027 than in 2021. Instances where that is not the case show a difference of less than 5% and occur at intersections which already show a significant impact, so it is not expected

that a change in background projections would alter the results of the analysis. No further response is needed.

30. Due to the uncertainty of timing for implementation of improvements identified in the Walnut General Plan, the Draft EIR has identified specific improvements that would address the impacts from the proposed 2018 EFMP project. In some instances, the City's identified mitigation measures are broader in scope than what is required for the 2018 EFMP project. As discussed in Section 4.14, Transportation/Traffic, a conservative approach was taken for each of the intersections identified by the commenter. As discussed in the Draft EIR, while Mt. SAC would work with these jurisdictions to implement the recommended improvements, Mt. SAC does not have the legal ability to compel these agencies to implement the improvements needed to mitigate this impact to a level of insignificance. Thus, the impacts would be significant and unavoidable.
31. In response to this comment, the commenter should refer to Page 55 (Section 5.5 Mitigation Measures) and Table 10 (Interim (2021) Cumulative Plus Mitigated Project Impacts Analysis) in the proposed 2018 EFMP TIA. As indicated on Page 55, the 2018 EFMP would result in a significant and unavoidable impact for existing plus project and 2027 plus project conditions, but not for 2021 plus project conditions. No further response is needed.
32. As discussed in the response to comment 29, the intentionally conservative projections for 2021 conditions resulted in a few of the 2021 volumes being higher than some 2027 volumes. However, the 2027 analysis is still considered to be conservative and meets the requirements agreed upon with the City before the analysis was completed. Further, the intersections listed in the comment generally have the same LOS in 2027 as they do in 2021, and it is not expected that minor adjustments in volumes would result in any additional significant impacts. Therefore, the intersection analyses will not be updated, and no further response is needed.
33. Comment noted; no response is required.
34. In response to this comment, the 2018 EFMP TIA paragraph two of section 1.2.1 Intersection Capacity Utilization (ICU) was revised. The new text is shown as **bold** and underline. In response to the peak hour factor, the commenter states that the use of a peak hour factor results in a conservative analysis. Therefore, the calculations will remain as-is, and no further response is needed.

Per the LA County guidelines, a maximum of 2,880 vehicles per hour per lane should be used in the ICU method for dual left turn lanes, and a maximum of 1,600 vehicles per hour per lane should be used for the remaining lane configurations. A ten percent yellow clearance time (i.e. lost time) should be included in the calculations. **Where a right turn overlap was present (or recommended), a reduction in right turn volume was calculated based on the estimated percentage of cycle time that would be allocated to the left turn phase that corresponds to the right turn overlap. The percentages are included in the ICU spreadsheets in the appendix.**

35. In response to this comment, in the Draft EIR, the second and third paragraphs of 4.14.1 Regulatory Setting, State, Senate Bill 743 have been revised. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

Senate Bill 743 (**Public Resources Code Section 21099**) replaces the traditional LOS performance metric for identifying environmental impacts with VMT as a more appropriate transportation metric for CEQA assessment. Senate Bill 743 (**Public Resources Code Section 21099**) also provides guidance on potential significance impact thresholds related to development projects, land use plans, and transportation infrastructure projects. In addition, the preliminary guidelines discuss factors for consideration in analyzing traffic safety impacts. The SB 743 (**Public Resources Code Section 21099**) guidance language is very specific about what may constitute significant impacts such as stating, “A development project . . . that results in vehicle miles traveled greater than the regional average for the land use type (e.g., residential, employment, commercial) may indicate a significant impact”. **The language also states that projects “proposed within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor will have a less-than-significant impact on VMT.” A major transit stop includes a sign which includes the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the peak commute periods, and a high-quality transit corridor is one with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.** It also identifies that a project with VMT less than the regional average for a similar use would not be considered a significant impact. For additional information related to VMT generation associated with the proposed Project, please refer to Section 4.2, *Air Quality*; Section 4.5, *Energy*, Section 4.7, *Greenhouse Gas Emissions*, and 4.10, *Land Use and Planning*, of the Final EIR.

For the proposed 2018 EFMP, it is assumed that **Foothill Transit will have its new Transit Center constructed on campus (on Temple Avenue west of Bonita Drive) before the interim analysis year of 2021, and well before the EFMP buildout year of 2027. Therefore, the proposed 2018 EFMP project would be located within ½ mile of an existing major transit stop and a high quality transit corridor and would therefore have a less than significant impact on VMT.** ~~enhanced services would help reduce overall VMT of local residents. Density of the Project and ability to utilize the existing Metrolink station are all attributes that would assist in decreasing the VMT generated by the Project on a per service population basis. The Project’s attributes would **may also** help reduce local and regional VMT and therefore the Project is consistent with the goals and policies of SB 743 (**Public Resources Code Section 21099**). For additional analysis of the Project’s SCAG’s regional plan goals, see Section 4.10, *Land Use and Planning*, sub-section 4.10.5, *Environmental Impacts*.~~

36. In response to this comment, Draft EIR Table 4.14-3 has been revised and the significant impact evaluation has been removed. In addition, the corresponding references for Footnotes 1 and 2 were added. Further, the appropriate references for the footnotes were also added for Draft EIR Tables 4.14-7 through 4.14-12; where references were not required, the footnotes were deleted. New text is shown as **bold** and underline.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-1  
EXISTING TRAFFIC CONDITIONS**

Intersection		AM Peak Hour			PM Peak Hour			Significant Impact?	
		Delay	V/C	LOS	Delay	V/C	LOS	AM	PM
1	Amar Rd/Nogales St		0.862	D		0.829	D	NO	NO
2	Amar Rd/Lemon Ave		0.792	C		0.652	B	NO	NO
3	Amar Rd/Meadow Pass Rd		0.773	C		0.699	B	NO	NO
4	Temple Ave/Grand Ave		0.932	E		0.813	D	YES	YES
5	Temple Ave/Mt. SAC Way		0.625	B		0.687	B	NO	NO
6	Temple Ave/Transit Center		0.589	A		0.478	A	NO	NO
7	Temple Ave/Bonita Dr		0.602	B		0.571	A	NO	NO
8	Temple Ave/Lot F <sup>2</sup>	27.2		D	18.7		C	N/A	N/A
9	Temple Ave/University Dr		0.839	D		0.688	B	YES	NO
10	Temple Ave/Campus Dr		1.003	F		0.759	C	YES	NO
11	Kellogg Dr/Campus Dr		0.828	D		0.579	A	YES	NO
12	Temple Ave/Valley Blvd		0.919	E		0.763	C	YES	NO
13	Temple Ave/Pomona Blvd		0.971	E		1.071	F	NO	YES
14	Temple Ave/SR-57 SB Ramps <sup>1</sup>	23.7		C	42.8		D	NO	NO
15	Temple Ave/SR-57 NB Ramps <sup>1</sup>	9.8		A	8.5		A	NO	NO
16	I-10 WB Ramps/Grand Ave <sup>1</sup>	21.8		C	20.6		C	NO	NO
17	I-10 EB Ramps/Grand Ave <sup>1</sup>	23.2		C	13.8		B	NO	NO
18	Holt Ave/Grand Ave		1.019	F		0.617	B	YES	NO
19	Cortez St/Grand Ave <sup>2</sup>	207.5		F	49.7		E	N/A	N/A
20	Cameron Ave/Barranca St <sup>2</sup>	48.2		E	29.1		D	N/A	N/A
21	Cameron Ave/Grand Ave		1.131	F		0.771	C	YES	YES
22	Mountaineer Rd/Grand Ave		0.719	C		0.753	C	NO	YES
23	San Jose Hills Rd/Grand Ave		0.934	E		0.897	D	YES	YES
24	La Puente Rd/Grand Ave		1.028	F		0.875	D	YES	YES
25	Valley Blvd/Grand Ave		0.907	E		0.824	D	YES	YES
26	Baker Pkwy/Grand Ave		0.581	A		0.534	A	NO	NO
27	SR-60 WB Ramps/Grand Ave <sup>1</sup>	24.2		C	15.2		B	NO	NO
28	SR-60 EB Ramps/Grand Ave <sup>1</sup>	22.7		C	13.9		B	NO	NO

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = volume/Capacity WB = Westbound

<sup>1</sup> Caltrans Intersection  
<sup>2</sup> Highest Lane Delay at TWSC Intersection

Source: Table 7, *Traffic Impact Study*, Psomas 2019.

37. In response to this comment, Draft EIR Tables 4.14-7 through 4.14-12 have been updated with the project-related change in delay or V/C. New text is shown as **bold** and underline.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-2  
EXISTING PLUS PROJECT IMPACTS – LOCAL INTERSECTIONS**

Intersection		AM Peak Hour			PM Peak Hour			Increase in Delay or V/C		Significant Impact	
		Delay	V/C	LOS	Delay	V/C	LOS	AM	PM	AM	PM
1	Amar Rd/Nogales St		0.874	D		0.838	D	0.01	0.01	NO	NO
2	Amar Rd/Lemon Ave		0.805	D		0.661	B	0.01	0.01	NO	NO
3	Amar Rd/Meadow Pass Rd		0.791	C		0.713	C	0.02	0.01	NO	NO
4	Temple Ave/Grand Ave		0.993	E		0.847	D	0.03	0.03	YES	YES
5	Temple Ave/Mt. SAC Way		0.664	B		0.738	C	0.04	0.05	NO	NO
6	Temple Ave/Transit Center		0.625	B		0.511	A	0.04	0.03	NO	NO
7	Temple Ave/Bonita Dr		0.677	B		0.621	B	0.07	0.05	NO	NO
8	Temple Ave/Lot F <sup>2</sup>	32.0		D	20.6		C	N/A	N/A	N/A	N/A
9	Temple Ave/University Dr		0.885	D		0.722	C	0.05	0.03	YES	NO
10	Temple Ave/Campus Dr		1.056	F		0.783	C	0.05	0.02	YES	NO
11	Kellogg Dr/Campus Dr		0.853	D		0.601	B	0.03	0.02	YES	NO
12	Temple Ave/Valley Blvd		0.936	E		0.776	C	0.02	0.01	YES	NO
13	Temple Ave/Pomona Blvd		0.974	E		1.077	F	0.00	0.01	NO	YES
14	Temple Ave/SR-57 SB Ramps <sup>1</sup>	24.2		C	43.6		D	N/A	N/A	NO	NO
15	Temple Ave/SR-57 NB Ramps <sup>1</sup>	10.0		A	8.5		A	N/A	N/A	NO	NO
16	I-10 WB Ramps/Grand Ave <sup>1</sup>	23.8		C	22.1		C	N/A	N/A	NO	NO
17	I-10 EB Ramps/Grand Ave <sup>1</sup>	27.7		C	13.7		B	N/A	N/A	NO	NO
18	Holt Ave/Grand Ave		1.057	F		0.638	B	0.04	0.02	YES	NO
19	Cortez St/Grand Ave <sup>2</sup>	278.2		F	60.7		F	N/A	N/A	N/A	N/A
20	Cameron Ave/Barranca St <sup>2</sup>	51.4		F	30.6		D	N/A	N/A	N/A	N/A
21	Cameron Ave/Grand Ave		1.184	F		0.809	D	0.05	0.04	YES	YES
22	Mountaineer Rd/Grand Ave		0.748	C		0.790	C	0.03	0.04	NO	YES
23	San Jose Hills Rd/Grand Ave		0.992	E		0.960	E	0.06	0.06	YES	YES
24	La Puente Rd/Grand Ave		1.063	F		0.895	D	0.04	0.02	YES	YES
25	Valley Blvd/Grand Ave		0.933	E		0.841	D	0.03	0.02	YES	YES
26	Baker Pkwy/Grand Ave		0.604	B		0.547	A	0.02	0.01	NO	NO
27	SR-60 WB Ramps/Grand Ave <sup>1</sup>	26.7		C	15.9		B	N/A	N/A	NO	NO
28	SR-60 EB Ramps/Grand Ave <sup>1</sup>	23.7		C	15.0		B	N/A	N/A	NO	NO

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-2  
EXISTING PLUS PROJECT IMPACTS – LOCAL INTERSECTIONS**

Intersection	AM Peak Hour			PM Peak Hour			Increase in Delay or V/C		Significant Impact	
	Delay	V/C	LOS	Delay	V/C	LOS	AM	PM	AM	PM
Delay = seconds of delay; EB = Eastbound; <b>BOLD</b> = significant impact/condition; LOS = Level of Service V/C = volume/Capacity WB = Westbound <sup>1</sup> Caltrans Intersection <sup>2</sup> Highest Lane Delay at TWSC Intersection Source: Table 7, <i>Traffic Impact Study</i> , Psomas 2019.										

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-3  
EXISTING PLUS PROJECT IMPACTS – LOCAL INTERSECTIONS – WITH MITIGATION**

Intersection		AM Peak Hour		PM Peak Hour		Increase in Delay or V/C		Significant Impact	
		V/C	LOS	V/C	LOS	AM	PM	AM	PM
4	Temple Ave/Grand Ave	0.962	E	0.841	D	<b>0.03</b>	<b>0.03</b>	YES	YES
9	Temple Ave/University Dr	0.807	D	0.709	C	<b>-0.03</b>	<b>0.02</b>	NO	NO
10	Temple Ave/Campus Dr	0.973	E	0.780	C	<b>-0.03</b>	<b>0.02</b>	NO	NO
11	Kellogg Dr/Campus Dr	0.802	D	0.530	A	<b>-0.03</b>	<b>-0.05</b>	NO	NO
12	Temple Ave/Valley Blvd	0.832	D	0.776	C	<b>-0.09</b>	<b>0.01</b>	NO	NO
13	Temple Ave/Pomona Blvd	0.936	E	1.034	F	<b>-0.03</b>	<b>-0.04</b>	NO	NO
18	Holt Ave/Grand Ave	0.911	E	0.638	B	<b>-0.11</b>	<b>0.02</b>	NO	NO
21	Cameron Ave/Grand Ave	0.985	E	0.702	C	<b>-0.15</b>	<b>-0.07</b>	NO	NO
22	Mountaineer Rd/Grand Ave	0.748	C	0.790	C	<b>0.03</b>	<b>0.04</b>	NO	YES
23	San Jose Hills Rd/Grand Ave	0.920	E	0.749	C	<b>-0.01</b>	<b>-0.15</b>	NO	NO
24	La Puente Rd/Grand Ave	1.030	F	0.874	D	<b>0.00</b>	<b>0.00</b>	NO	NO
25	Valley Blvd/Grand Ave	0.933	E	0.841	D	<b>0.03</b>	<b>0.02</b>	YES	YES

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = volume/Capacity  
WB = Westbound

<sup>1</sup> Caltrans Intersection  
<sup>2</sup> Highest Lane Delay at TWSC Intersection

Source: Table 8, *Traffic Impact Study*, Psomas 2019.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-4  
INTERIM (2021) CUMULATIVE PLUS PROJECT IMPACTS ANALYSIS**

Intersection	2021 Cumulative						2021 Cumulative Plus Project						Increase in Delay or V/C		Significant Impact?	
	AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM	PM	AM	PM
	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	AM	PM	AM	PM
1 Amar Rd/Nogales St		0.877	D		0.846	D		0.882	D		0.849	D	0.00	0.00	NO	NO
2 Amar Rd/Lemon Ave		0.806	D		0.662	B		0.810	D		0.665	B	0.00	0.00	NO	NO
3 Amar Rd/Meadow Pass Rd		0.803	D		0.730	C		0.810	D		0.736	C	0.01	0.01	NO	NO
4 Temple Ave/Grand Ave		0.948	E		0.842	D		0.974	E		0.855	D	0.03	0.01	YES	NO
5 Temple Ave/Mt. SAC Way		0.637	B		0.699	B		0.650	B		0.722	C	0.01	0.02	NO	NO
6 Temple Ave/Transit Center		0.600	B		0.486	A		0.611	B		0.498	A	0.01	0.01	NO	NO
7 Temple Ave/Bonita Dr		0.610	B		0.582	A		0.635	B		0.601	B	0.03	0.02	NO	NO
8 Temple Ave/Lot F <sup>2</sup>	28.2		D	19.2		C	29.9		D	20.0		C	N/A	N/A	N/A	N/A
9 Temple Ave/University Dr		0.851	D		0.700	C		0.868	D		0.713	C	0.02	0.01	YES	NO
10 Temple Ave/Campus Dr		1.021	F		0.774	C		1.042	F		0.781	C	0.02	0.01	YES	NO
11 Kellogg Dr/Campus Dr		0.841	D		0.590	A		0.851	D		0.598	A	0.01	0.01	NO	NO
12 Temple Ave/Valley Blvd		0.934	E		0.773	C		0.941	E		0.778	C	0.01	0.01	YES	NO
13 Temple Ave/Pomona Blvd		1.030	F		1.158	F		1.031	F		1.160	F	0.00	0.00	NO	NO
14 Temple Ave/SR-57 SB Ramps <sup>1</sup>	24.3		C	45.6		D	24.5		C	45.9		D	N/A	N/A	NO	NO

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-4  
INTERIM (2021) CUMULATIVE PLUS PROJECT IMPACTS ANALYSIS**

Intersection	2021 Cumulative						2021 Cumulative Plus Project						Increase in Delay or V/C		Significant Impact?	
	AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM	PM	AM	PM
	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	AM	PM	AM	PM
15 Temple Ave/SR-57 NB Ramps <sup>1</sup>	10.1		B	8.9		A	10.1		B	8.9		A	N/A	N/A	NO	NO
16 I-10 WB Ramps/Grand Ave <sup>1</sup>	24.9		C	22.5		C	25.4		C	23.4		C	N/A	N/A	NO	NO
17 I-10 EB Ramps/Grand Ave <sup>1</sup>	24.8		C	13.8		B	26.6		C	13.8		B	N/A	N/A	NO	NO
18 Holt Ave/Grand Ave		1.045	F		0.648	B		1.060	F		0.656	B	0.02	0.01	YES	NO
19 Cortez St/Grand Ave <sup>2</sup>	248.6		F	62.5		F	278.2		F	66.4		F	N/A	N/A	N/A	N/A
20 Cameron Ave/Barranca St <sup>2</sup>	51.6		F	31.1		D	53.1		F	31.7		D	N/A	N/A	N/A	N/A
21 Cameron Ave/Grand Ave		1.158	F		0.808	D		1.178	F		0.823	D	0.02	0.01	YES	NO
22 Mountaineer Rd/Grand Ave		0.750	C		0.786	C		0.763	C		0.802	D	0.01	0.02	NO	NO
23 San Jose Hills Rd/Grand Ave		0.972	E		0.934	E		0.995	E		0.957	E	0.02	0.02	YES	YES
24 La Puente Rd/Grand Ave		1.062	F		0.918	E		1.076	F		0.926	E	0.01	0.01	YES	YES
25 Valley Blvd/Grand Ave		0.931	E		0.888	D		0.941	E		0.894	D	0.01	0.01	YES	NO

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-4  
INTERIM (2021) CUMULATIVE PLUS PROJECT IMPACTS ANALYSIS**

Intersection	2021 Cumulative						2021 Cumulative Plus Project						Increase in Delay or V/C		Significant Impact?	
	AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM	PM	AM	PM
	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	AM	PM	AM	PM
26 Baker Pkwy/Grand Ave		0.590	A		0.548	A		0.599	A		0.553	A	0.01	0.01	NO	NO
27 SR-60 WB Ramps/Grand Ave <sup>1</sup>	24.8		C	15.4		B	25.7		C	15.8		B	N/A	N/A	NO	NO
28 SR-60 EB Ramps/Grand Ave <sup>1</sup>	23.8		C	14.7		B	24.2		C	15.1		B	N/A	N/A	NO	NO

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = volume/Capacity WB = Westbound

<sup>1</sup> Caltrans Intersection  
<sup>2</sup> Highest Lane Delay at TWSC Intersection

Source: Table 9, *Traffic Impact Study*, Psomas 2019.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-5  
INTERIM (2021) CUMULATIVE PLUS MITIGATED PROJECT IMPACTS ANALYSIS**

Intersection	2021 Cumulative			2021 Cumulative + Project w/Mitigation			Increase in Delay or V/C			Significant Impact?		
	AM Peak Hour		PM Peak Hour	AM Peak Hour		PM Peak Hour	AM		PM		AM	PM
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	AM	PM
4 Temple Ave/ Grand Ave	0.948	E	0.842	D	0.946	E	0.845	D	0.00	0.00	NO	NO
9 Temple Ave/ University Dr	0.851	D	0.700	C	0.800	C	0.702	C	-0.05	0.00	NO	NO
10 Temple Ave/ Campus Dr	1.021	F	0.774	C	0.962	E	0.779	C	-0.06	0.00	NO	NO
12 Temple Ave/ Valley Blvd	0.934	E	0.773	C	0.833	D	0.778	C	-0.10	0.01	NO	NO
18 Holt Ave/Grand Ave	1.045	F	0.648	B	0.916	E	0.656	B	-0.13	0.01	NO	NO
21 Cameron Ave/ Grand Ave	1.158	F	0.808	D	0.980	E	0.715	C	-0.18	-0.09	NO	NO
23 San Jose Hills Rd/ Grand Ave	0.972	E	0.934	E	0.914	E	0.742	C	-0.06	-0.19	NO	NO
24 La Puente Rd/ Grand Ave	1.062	F	0.918	E	1.041	F	0.904	E	-0.02	-0.01	NO	NO
25 Valley Blvd/ Grand Ave	0.931	E	0.888	D	0.941	E	0.894	D	0.01	0.01	YES	NO

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = volume/Capacity WB = Westbound

<sup>1</sup> Caltrans Intersection

<sup>2</sup> Highest Lane Delay at TWSC Intersection

Source: Table 10, *Traffic Impact Study*, Psomas 2019.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-6  
BUILDOUT (2027) CUMULATIVE PLUS PROJECT IMPACTS ANALYSIS**

Intersection	2027 Cumulative						2027 Cumulative Plus Project						Increase in Delay or V/C		Significant Impact?		
	AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			AM	PM	AM	PM	
	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	AM	PM	AM	PM	
1 Amar Rd/Nogales St		0.922	E		0.890	D			0.933	E		0.899	D	0.01	0.01	YES	NO
2 Amar Rd/Lemon Ave		0.843	D		0.695	B			0.857	D		0.704	C	0.01	0.01	NO	NO
3 Amar Rd/Meadow Pass Rd		0.818	D		0.747	C			0.836	D		0.761	C	0.02	0.01	YES	NO
4 Temple Ave/Grand Ave		0.957	E		0.852	D			1.018	F		0.884	D	0.06	0.03	YES	YES
5 Temple Ave/Mt. SAC Way		0.639	B		0.703	C			0.676	B		0.754	C	0.04	0.05	NO	YES
6 Temple Ave/Transit Center		0.611	B		0.492	A			0.647	B		0.525	A	0.04	0.03	NO	NO
7 Temple Ave/Bonita Dr		0.602	B		0.586	A			0.677	B		0.636	B	0.07	0.05	NO	NO
8 Temple Ave/Lot F <sup>2</sup>	27.8		D	19.200		C	32.9			D	21.200		C	N/A	N/A	N/A	N/A
9 Temple Ave/University Dr		0.862	D		0.714	C			0.908	E		0.748	C	0.05	0.03	YES	NO
10 Temple Ave/Campus Dr		1.034	F		0.804	D			1.087	F		0.821	D	0.05	0.02	YES	YES
11 Kellogg Dr/Campus Dr		0.873	D		0.601	B			0.899	D		0.623	B	0.03	0.02	YES	NO
12 Temple Ave/Valley Blvd		0.979	E		0.811	D			0.996	E		0.825	D	0.02	0.01	YES	NO
13 Temple Ave/Pomona Blvd		1.055	F		1.176	F			1.059	F		1.182	F	0.00	0.01	NO	YES
14 Temple Ave/SR-57 SB Ramps <sup>1</sup>	25.6		C	53.4		D	26.2			C		54.6	D	N/A	N/A	NO	NO
15 Temple Ave/SR-57 NB Ramps <sup>1</sup>	10.9		B	9.5		A	11.0			B		9.5	A	N/A	N/A	NO	NO
16 I-10 WB Ramps/Grand Ave <sup>1</sup>	27.4		C	23.1		C	28.9			C		25.2	C	N/A	N/A	NO	NO
17 I-10 EB Ramps/Grand Ave <sup>1</sup>	24.8		C	14.6		B	30.1			C		14.7	B	N/A	N/A	NO	NO
18 Holt Ave/Grand Ave		1.066	F		0.644	B			1.105	F		0.665	B	0.04	0.02	YES	NO
19 Cortez St/Grand Ave <sup>2</sup>	259.4		F	53.900		F	376.0			F		64.400	F	N/A	N/A	N/A	N/A
20 Cameron Ave/Barranca St <sup>2</sup>	67.9		F	39.800		E	72.4			F		40.900	E	N/A	N/A	N/A	N/A

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-6  
BUILDOUT (2027) CUMULATIVE PLUS PROJECT IMPACTS ANALYSIS**

Intersection	2027 Cumulative						2027 Cumulative Plus Project						Significant Impact?			
	AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour			Increase in Delay or V/C			
	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C	LOS	AM	PM		
21 Cameron Ave/Grand Ave		1.174	F		0.796	C		1.227	F		0.834	D	0.05	0.04	YES	YES
22 Mountaineer Rd/Grand Ave		0.748	C		0.788	C		0.777	C		0.825	D	0.03	0.04	NO	YES
23 San Jose Hills Rd/Grand Ave		0.967	E		0.935	E		1.024	F		0.998	E	0.06	0.06	YES	YES
24 La Puente Rd/Grand Ave		1.080	F		0.929	E		1.115	F		0.949	E	0.04	0.02	YES	YES
25 Valley Blvd/Grand Ave		0.957	E		0.895	D		0.983	E		0.912	E	0.03	0.02	YES	YES
26 Baker Pkwy/Grand Ave		0.602	B		0.561	A		0.625	B		0.574	A	0.02	0.01	NO	NO
27 SR-60 WB Ramps/Grand Ave <sup>1</sup>	25.8		C	16.1		B	28.9		C	17.3		B	N/A	N/A	NO	NO
28 SR-60 EB Ramps/Grand Ave <sup>1</sup>	25.2		C	15.8		B	26.4		C	17.0		B	N/A	N/A	NO	NO

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = volume/Capacity WB = Westbound

<sup>1</sup> Caltrans Intersection

<sup>2</sup> Highest Lane Delay at TWSC Intersection

Source: Table 11, *Traffic Impact Study*, Psomas 2019.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-7  
 BUILDOUT (2027) CUMULATIVE PLUS MITIGATED PROJECT IMPACTS ANALYSIS**

Intersection		2021 Cumulative				2021 Cumulative + Project w/Mitigation				Increase in Delay or V/C		Significant Impact?	
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM	AM	PM
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS				
1	Amar Rd/ Nogales St	0.922	E	0.890	D	0.914	E	0.894	D	-0.01	0.00	NO	NO
3	Amar Rd/ Meadow Pass Rd	0.818	D	0.747	C	0.836	D	0.761	C	0.02	0.01	YES	NO
4	Temple Ave/ Grand Ave	0.957	E	0.852	D	0.984	E	0.873	D	0.03	0.02	YES	YES
5	Temple Ave/ Mt. SAC Way	0.639	B	0.703	C	0.675	B	0.689	B	0.04	-0.01	NO	NO
9	Temple Ave/ University Dr	0.862	D	0.714	C	0.839	D	0.735	C	-0.02	0.02	NO	NO
10	Temple Ave/ Campus Dr	1.034	F	0.804	D	1.004	F	0.815	D	-0.03	0.01	NO	NO
11	Kellogg Dr/ Campus Dr	0.873	D	0.601	B	0.843	D	0.549	A	-0.03	-0.05	NO	NO
12	Temple Ave/ Valley Blvd	0.979	E	0.811	D	0.882	D	0.825	D	-0.10	0.01	NO	NO
13	Temple Ave/ Pomona Blvd	1.055	F	1.176	F	1.011	F	1.135	F	-0.04	-0.04	NO	NO
18	Holt Ave/ Grand Ave	1.066	F	0.644	B	0.958	E	0.665	B	-0.11	0.02	NO	NO
21	Cameron Ave/ Grand Ave	1.174	F	0.796	C	1.017	F	0.721	C	-0.16	-0.07	NO	NO
22	Mountaineer Rd/ Grand Ave	0.748	C	0.788	C	0.777	C	0.825	D	0.03	0.04	NO	YES
23	San Jose Hills Rd/ Grand Ave	0.967	E	0.935	E	0.948	E	0.777	C	-0.02	-0.16	NO	NO
24	La Puente Rd/ Grand Ave	1.080	F	0.929	E	1.079	F	0.926	E	0.00	0.00	NO	NO
25	Valley Blvd/ Grand Ave	0.957	E	0.895	D	0.983	E	0.912	E	0.03	0.02	YES	YES

Delay = seconds of delay; EB = Eastbound; **BOLD** = significant impact/condition; LOS = Level of Service V/C = volume/Capacity  
WB = Westbound

<sup>1</sup> Caltrans Intersection

<sup>2</sup> Highest Lane Delay at TWSC Intersection

Source: Table 12, *Traffic Impact Study*, Psomas 2019.

38. In response to this comment, Draft EIR Threshold 14.2 has been revised. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

The CEQA Guidelines Section 15064.3(b) state that if the VMT generated by a project exceed an applicable threshold of significance, it may indicate a significant impact. The guidelines also state that projects ~~which decrease VMT in the project area when compared to existing conditions should be presumed to have a less than significant impact~~ **“proposed within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor will have a less-than-significant impact on VMT.”** The Transit Center identified in the proposed 2018 EFMP is a separate project being completed in coordination with Foothill Transit. The Transit Center would be constructed on campus located on the north side of Temple Avenue. The proposed 2018 EFMP project would be located within one-half mile of a major transit stop with development of the new Transit Center. Therefore, with implementation of the proposed Transit Center project which would serve the project site, the proposed 2018 EFMP would be considered to have a less than significant transportation impact in regard to Section 15064.3, subdivision (b) and no mitigation is required.

39. In response to this comment, the Draft EIR first paragraph under Section 4.14.6 Cumulative Impacts has been revised. Deleted text is shown as ~~strikethrough~~.

Cumulative traffic impacts consider the impacts of future growth and development in the City on the roadway system serving the Project area as well as non-vehicular transportation services. A detailed quantitative analysis of Project traffic impacts under General Plan and Project buildout conditions was discussed in Section 4.14.5, Environmental Impacts, Threshold 14-1. As identified in that analysis, the proposed Project would result in a significant and unavoidable cumulative impact under ~~Existing Plus Project Condition, 2021 Plus Project Condition and 2027 Plus Project Condition at the intersections of Mountaineer Road and Grand Avenue and Valley Boulevard and Grand Avenue, even with implementation of Mitigation Measures TRA-1 and TRA-2.~~ In addition, the proposed Project would result in a significant and unavoidable cumulative impact under the 2027 Plus Project Condition at the intersections of Amar Road and Meadow Pass Road, even with implementation of Mitigation Measures TRA-1 and TRA-2. There is insufficient right-of-way to accommodate the required improvements at these intersections; therefore, the proposed Project would contribute to this cumulatively considerable traffic impact.

40. In response to this comment, Draft EIR Section 4.14-7 Mitigation Measure MM TRA-1 has been revised. Deleted text is shown as ~~strikethrough~~.

#### ~~22. Mountaineer Road and Grand Avenue~~

- ~~• This intersection already includes dual southbound and westbound left turn lanes, dual westbound right turn lanes, and a northbound (de facto) right turn lane. To mitigate the impacts, a northbound through lane would need to be added on Grand Avenue, which is not feasible due to right-of-way constraints.~~

41. The comment serves as an introduction to the Air Quality comments that follow. No response is required.
42. As noted by the commenter, the impact discussion states that proposed 2018 EFMP Phase 2 cannot be quantified for construction emissions as it is too speculative to do so. The commenter noted that Table 3-1 of the Project Description does provide the specific amount of construction, renovation, and demolition associated with Phase 2. Mt. SAC has focused on those individual projects within Phase 1A and 1B of the EFMP that they are seeking environmental impact disclosure as per the requirements of CEQA. It is explicitly stated on pages 2-3 and 2-4 of the Section 2, Introduction, "At the design approval stage, Mt. SAC will evaluate each individual project to determine whether it is within the scope of the program described and evaluated in this Draft EIR and to determine what, if any, additional environmental documentation pursuant to CEQA is needed." Further, on page 3-22, "As discussed in Section 2, Introduction, this Draft EIR addresses the impacts resulting from construction and operation of the proposed 2018 EFMP as a long-range planning and development plan at a "program level" (Phases 1A, 1B and 2), including components that were included in previous Facilities Master Plans but not yet implemented." The following paragraphs/text on the top of page 3-23 define the five "projects" within Phases 1A and 1B that are evaluated on a "project level" basis. Therefore, project-level analyses included in Phase 2 that is not defined in this list of five projects would be subject to future consideration for additional CEQA documentation.

In addition, the modeling of construction emissions for the assessment air quality impacts of the EFMP is not required per Mt. SAC significance thresholds. Pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance. Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (State CEQA Guidelines, Section 15064.7[c]).

The Mt. SAC Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact's level of significance. Mt. SAC's Thresholds of Significance for air quality emissions are categorized into two types of projects: "multiple projects", and "site-specific projects for single projects" (Mt. SAC 2016). Therefore, per Mt. SAC's guidelines, an air quality impact for multiple projects would occur if the SCAQMD thresholds were to be exceeded based upon the net trip increase from baseline to buildout, which is based on fall student enrollment headcount increases. Therefore, a significant impact would occur if the operational threshold was exceeded for the totality of emissions from these projects. As such, the construction emissions provided for Phases 1A and 1B are provided in the air quality analysis for informational purposes and to assess the magnitude of emissions generated by the known components of Phases 1A and 1B. Phase 2 construction scheduling is too speculative to model, and since it is not required for the determining of significance, it was not provided in this air quality analysis.

Additionally, it is explicitly stated on pages 2-3 and 2-4 of Section 2, Introduction, "At the design approval stage, Mt. SAC will evaluate each individual project to determine whether it is within the scope of the program described and evaluated in this Draft EIR and to

determine what, if any, additional environmental documentation pursuant to CEQA is needed.” Further, on page 3-22, “As discussed in Section 2, Introduction, this Draft EIR addresses the impacts resulting from construction and operation of the proposed 2018 EFMP as a long-range planning and development plan at a “program level” (Phases 1A, 1B and 2), including components that were included in previous Facilities Master Plans but not yet implemented.”

The following paragraphs/text on the top of page 3-23 define the five “projects” that are evaluated on a “project level” basis and, thus, would not be subject to consideration of what additional environmental documentation pursuant to CEQA is needed. Therefore, individual projects included in Phase 2 are not defined in this list of five projects and would be subject to future consideration for additional CEQA documentation. In future CEQA analyses, Phase 2 construction emissions will be compared to construction thresholds of significance as a “site-specific project.” A site-specific project is defined as “individual projects previously evaluated in a certified FMP EIR or Subsequent EIR with DSA submittal or approval” (Mt. SAC 2016). This clarification has been provided in the text on the last paragraph on page 4.2-19 of Section 4.2, Air Quality. Deleted text is shown as ~~strike through~~ and new text is shown as **bold** and underline.

**Pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance. Furthermore, “when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence” (State CEQA Guidelines, Section 15064.7(c)). The Mt. SAC Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact’s level of significance. Mt. SAC’s Thresholds of Significance for air quality emissions are categorized into two types of projects: “multiple projects”, and “site-specific projects for single projects”. Therefore, per Mt. SAC’s guidelines, an air quality impact for multiple projects would occur if the SCAQMD thresholds were to be exceeded based on the net trip increase from baseline to buildout, which is based on fall student enrollment headcount increases. Therefore, a significant impact would occur if the operational threshold was exceeded for the totality of emissions from these projects. As such, the construction emissions provided for Phases 1A and 1B are provided in the air quality analysis for informational purposes and to assess the magnitude of emissions generated by the known components of Phases 1A and 1B.** A project with daily emission rates below the SCAQMD’s established air quality significance thresholds (shown in Table 4.2-4) would have a less than significant effect on regional air quality, consistent with Mt. SAC’s thresholds of significance. The proposed 2018 EFMP emissions were estimated using the CalEEMod version 2016.3.2 computer program (CAPCOA 2016). The proposed Project identifies the framework for the uses and development of land on campus necessary to accommodate an identified level of enrollment and physical development. However, enrollment decisions and the actual implementation of specific capital projects are influenced by multiple factors, including funding decisions, demographics, and other factors external to the proposed Project process. Thus, while the proposed Project identifies the physical resources necessary to meet Mt.

SAC's mission and its long-range development plans, it makes no commitments regarding the timing for achieving identified enrollment projections or implementing physical development. **Due to the availability of Phase 1A- and 1B-specific construction information and to assess the magnitude of air quality emissions to be generated by known components of Phases 1A and 1B, the construction of Phases 1A and 1B were quantified for this analysis and provided for informational purposes.** Specifically, construction details for Phase 2 are too speculative to be quantified at this time. **However, as detailed in Section 2, Introduction, Phase 2 components will be subject to future additional CEQA analyses. In future CEQA analyses, Phase 2 construction emissions will be compared to construction thresholds of significance as a "site-specific project."** The construction of Phases 1A and 1B were quantified for this analysis.

43. In response to this comment, the following text has been modified under Table 4.2-5 of Air Quality on page 4.2-20. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

As shown in Table 4.2-5, NO<sub>x</sub> emissions during construction in 2019 **and 2020** would exceed the SCAQMD threshold of 100 pounds per day.

44. The commenter states that the Phase 2 construction emissions must be quantified and compared to the significance thresholds before determination of significance. Please refer to the response and text edits within Comment 42 for a response to this comment.

45. The commenter states that emissions from renovation activities should be calculated and disclosed within the Air Quality Section, and the commenter notes that "CalEEMod does not contain a renovation tab, the model can be adjusted to provide a reasonable though conservative estimate from renovation activity". However, pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance (Mt. SAC 2016). Under the "Air Quality—CEQA Procedures" column of Mt. SAC's Thresholds of Significance, it specifically states, "Renovation projects are usually excluded from further CalEEMod analyses because the construction activities do not result in significant net emissions." Therefore, the emissions from renovation projects were not included in the air quality analysis.

46. In response to this comment, the following text has been modified under Table 4.2-8 of Air Quality on page 4.2-22. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

The proposed 2018 EFMP would generate 5,613 net trips per day **(Psomas 2019)**.

47. As discussed in Section 3.4, Project Background, certain components of the 2015 FMPU have been carried forward in the proposed 2018 EFMP for analysis; however, these elements have been clearly restated as elements of the proposed 2018 EFMP in Table 3-1 of the Draft EIR and are included as part of the program-level analysis in the Draft EIR. In order to clarify the discussion in the Draft EIR, the following text has been added immediately following the first sentence of the third paragraph on page 3-22. The new text is shown as **bold** and underline.

As discussed in Section 2, Introduction, this Draft EIR addresses the impacts resulting from construction and operation of the proposed 2018 EFMP as a long-range planning and development plan at a “program level” (Phases 1A, 1B and 2), including components that were included in previous Facilities Master Plans but not yet implemented. **These components are restated as elements of the proposed 2018 EFMP as shown in Table 3-1.**

48. In response to this comment, the following text has been modified in the Air Quality section on page 4.2-23. Deleted text is shown as ~~striketrough~~ and new text is shown as **bold** and underline.

**The AQMP incorporates the assumptions from the 2016–2040 RTP/SCS and SCAG’s latest growth forecasts within its goals. Therefore, because the proposed 2018 EFMP population profile data is included within SCAG’s 2016–2040 RTP/SCS growth projections, it is consistent with the AQMP, and** ~~Because the proposed 2018 EFMP is consistent with the goals of the AQMP, no conflict with the 2016 AQMP would occur with the proposed Project.~~

49. The commenter provides a recommendation summary for Comments 42, 44, 45, and 47. More specific references to this information is detailed below:

The commenter states that the analysis should quantify Air Quality emissions from Phase 2 construction. The commenter is directed to the response to Comment 42.

The commenter recommends modeling of renovation impacts. Please review the response to Comment 45 for this response.

The commenter states that input modeling specifications should be consistent with the information provided in Section 3.0, Project Description, Table 3-1. The commenter is directed to response to Comment 42.

The commenter refers to confirmation of components of the proposed 2018 EFMP. Please review the response to Comment 47.

The commenter requests a modeling output file for use at Appendix C1 as a .pdf directly. The modeling outputs from the Draft EIR can be found in Appendix C. Additional modeling outputs have been incorporated into Appendix C1 of the Final EIR.

50. Comment noted; no response required.

51. In response to this comment, the following text has been modified in the Greenhouse Gas Emissions section in the first sentence under Section 4.7.3, Methods. Deleted text is shown as ~~striketrough~~ and new text is shown as **bold** and underline.

~~Existing and~~ **P**roposed 2018 EFMP GHG emissions were calculated by using CalEEMod version 2016.3.2 (CAPCOA 2017).

52. In response to this comment, the following text has been modified in the Greenhouse Gas Section in Table 4.7-2. Deleted text is shown as ~~striketrough~~ and new text is shown as **bold** and underline.

Source: Mt. SAC 2018b.

53. In response to this comment, the following text has been modified under the fourth paragraph under Threshold 6.1 in Section 4.7, Greenhouse Gas Emissions. Additionally, the construction and operational emissions for Phase 2 were added to the analysis. However, per Mt. SAC's Thresholds of Significance, methodologies for determining air quality and greenhouse gas emissions differ between topics. Air quality for multiple projects (i.e., the program-level analysis) is compared to operational thresholds. For greenhouse gas emissions, emissions from site-specific projects are compared to Mt. SAC's a threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e). Please refer to Comment 54 for GHG emissions associated with the construction and operation of Phase 2 uses. Deleted text is shown as ~~striketrough~~ and new text is shown as **bold** and underline.

Sources of the operational GHG emissions attributed to the proposed Project include area, energy, mobile, water, and solid waste sources. The modeling inputs for operational emissions assume a ~~2022~~ 2027 buildout of Phases 1A~~1~~ and 1B, **and 2**, assuming the net operational uses.

As noted by the commenter, and pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance (Mt. SAC 2016). According to the State CEQA Guidelines, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (State CEQA Guidelines, Section 15064.7[c]). The Mt. SAC Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact's level of significance.

54. Mt. SAC's Thresholds of Significance for greenhouse gas emissions only addresses site-specific project thresholds. Per the guidelines, there is no "multiple project" GHG threshold, as was detailed by Mt. SAC in their Air Quality thresholds. Therefore, the site-specific project threshold was used to combine the amortized construction emissions and operational emissions from individual components of Phases 1A and 1B to compare it to Mt. SAC's 3,000 MTCO<sub>2</sub>e/year determine significance. The commenter's recommendation that the entire Project should be compared to a significance threshold is inconsistent with the significance threshold established by the lead agency. As such, analysis of GHG emissions for each project component of the EFMP was conducted consistent with the GHG significance threshold.

Because the Draft EIR is a program and project level document, the GHG significance threshold requires the analysis of every project component individually, GHG emissions from each of the Phase 2 projects have been added to the analysis, in Table 4.7-8 on page 4.7-20. Deleted text is shown as ~~striketrough~~ and new text is shown as **bold** and underline.

**TABLE ERROR! NO TEXT OF SPECIFIED STYLE IN DOCUMENT.-8**  
**ESTIMATED ANNUAL GREENHOUSE GAS EMISSIONS**  
**FOR PHASE 2 (MTCO<sub>2</sub>E/YEAR)**

<u>Phase 2 Components</u>	<u>Auditorium</u>	<u>Campus Safety</u>	<u>Continuing Education</u>	<u>Fire Training</u>	<u>Old Dairy Unit</u>	<u>Reuse Depot</u>	<u>Student Services North</u>	<u>Technical Education</u>	<u>Parking Structure B</u>	<u>Parking Structure F</u>
<b>Construction Emissions</b>										
<u>2026</u>	<u>279</u>	<u>60</u>	<u>71</u>	<u>62</u>	<u>13</u>	<u>65</u>	<u>276</u>	<u>458</u>	<u>591</u>	<u>872</u>
<u>2027</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>25</u>	<u>7</u>	<u>593</u>
<u>Total Construction Emissions</u>	<u>279</u>	<u>60</u>	<u>71</u>	<u>62</u>	<u>13</u>	<u>65</u>	<u>276</u>	<u>483</u>	<u>598</u>	<u>1465</u>
<u>Amortized Construction Emissions</u>	<u>9</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>&lt;1</u>	<u>2</u>	<u>9</u>	<u>16</u>	<u>20</u>	<u>49</u>
<b>Operational Emissions</b>										
<u>Area</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>Energy</u>	<u>349</u>	<u>70</u>	<u>186</u>	<u>93</u>	<u>&lt;1</u>	<u>116</u>	<u>349</u>	<u>745</u>	<u>121</u>	<u>297</u>
<u>Mobile</u>	<u>512</u>	<u>103</u>	<u>275</u>	<u>138</u>	<u>&lt;1</u>	<u>172</u>	<u>516</u>	<u>1,100</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>Waste</u>	<u>49</u>	<u>10</u>	<u>26</u>	<u>13</u>	<u>&lt;1</u>	<u>16</u>	<u>49</u>	<u>105</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>Water</u>	<u>41</u>	<u>8</u>	<u>22</u>	<u>11</u>	<u>&lt;1</u>	<u>14</u>	<u>41</u>	<u>87</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>Total Operational Emissions</u>	<u>951</u>	<u>191</u>	<u>509</u>	<u>255</u>	<u>&lt;1</u>	<u>318</u>	<u>955</u>	<u>2,037</u>	<u>121</u>	<u>297</u>
<u>Total Annual Emissions*</u>	<u>960</u>	<u>193</u>	<u>511</u>	<u>257</u>	<u>13</u>	<u>320</u>	<u>964</u>	<u>2,053</u>	<u>141</u>	<u>346</u>
<u>Mt. SAC Project Specific Threshold</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>	<u>3,000</u>
<u>Exceeds threshold?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<b>Notes:</b>										
<b>* Total Annual Emissions are the total of amortized construction emissions plus operational phase emissions.</b>										

As shown in Tables 4.7-3 through 4.7-78, the GHG emissions from the individual projects associated with the proposed 2018 EFMP would be generated from energy and mobile sources. As noted above, Mt. SAC has established interim GHG thresholds related to project-level emissions from land use projects. The threshold for combined amortized construction and operational emissions is 3,000 MTCO<sub>2</sub>e/yr per project. The GHG emissions for the individual project components associated with the proposed 2018 EFMP would all be less than the 3,000 MTCO<sub>2</sub>e/yr threshold, with implementation of MM GHG-1, which requires that all major capital projects (10,000 square feet and above) be designed to outperform Title 24, Part 6 Energy Efficiency Standards by a minimum of 15%.

55. In response to this comment, the following text has been modified on page 4.7-22. It is noted that the text revisions do no change the overall significance finding for the project. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

~~Because t~~The proposed 2018 EFMP would ~~reduce emissions consistent with AB 32 and would continue to~~ incorporate additional emissions-reducing measures that may be required by future laws or policies; **therefore**, it would not impede the achievement of EO S-3-05's 2050 goals, EO B-30-15's 2030 goals, or other interim goals that may be established.

56. The commenter provides a recommendations summary for the above-mentioned comments. The commenter requests a quantification of GHG emissions consistent to the method employed for the Air Quality Section. Please refer to the responses to Comment 53 for the response/textual edits.

The commenter refers to renovation quantification. A response to this can be found in response to Comment 45.

The commenter refers to input modeling specifications consistent with the information provided in Section 3.0, Project Description, Table 3-1. The input modeling specifications for Phase 2 have been added to the GHG analysis (shown in response to Comment #54) and in Appendix C of the Draft EIR.

The commenter refers to "the components of the 2016 EFMP that have not yet been implemented". A response to this comment can be found in response to Comment 47.

The commenter refers to the GHG methodology for significance. A response to this can be found in response to Comment 54.

As noted by the commenter, the impact discussion states that the proposed 2018 EFMP emissions should have been compared to SCAQMD's efficiency-based threshold as opposed to the bright-line numeric threshold. Pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance. Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (State CEQA Guidelines, Section 15064.7[c]). The Mt. SAC Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact's level of significance. Therefore, as Mt. SAC is the Lead Agency for this document, the Draft EIR analysis is consistent with the Thresholds of Significance adopted by Mt. SAC.

The commenters recommends that the proposed 2018 EFMP swap the analysis for Threshold 6.1 with 6.2, to address Mt. SAC's 2018 Climate Action Plan (2018 CAP) under Threshold 6.1 instead of Threshold 6.2. The Draft EIR analyzes consistency with Mt. SAC's 2018 CAP under Threshold 6.2 because Threshold 6.2 refers to whether the proposed Project would "conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas emissions". Mt. SAC's 2018 CAP is an applicable plan that is adopted for the purpose of reducing greenhouse gas

emissions. Specifically, the discussion regarding consistency with the 2018 CAP is on page 4.7-24, under the heading “Consistency with the Mt. SAC Climate Action Plan.”

Specifics regarding implementation of Mt. SAC’s 2018 CAP in relation to the proposed 2018 EFMP can be found on page 4.7-24 of the Draft EIR, under the heading “Consistency with the Mt. SAC Climate Action Plan.” For instance, as described on page 4.7-15, the proposed 2018 EFMP would be designed to surpass the minimum standard of a LEED “Silver” New Construction (NC) rating, and to exceed California Building Code Title 24 energy efficiency requirements by 15 percent or greater (MM GHG-1), per Mt. SAC’s 2018 CAP, Green Building Standard. MM GHG-1 requires that “All major capital projects (10,000 square feet and above) shall be designed to outperform Title 24, Part 6, Energy Efficiency Standards, by a minimum of 15%.” In addition to it being required as a mitigation measure, it is also a strategy detailed in Mt. SAC’s 2018 CAP, as stated above. These strategies, as detailed under Thresholds 6.1 and 6.2 in the Draft EIR, would reduce energy consumption from the 2014 baseline by 20 percent by the end of 2020, 50 percent by 2035, and 100 percent by 2050. Given that the CEQA document is a Program EIR, the extent of the specific 2018 CAP strategies of sustainable building strategies will be decided upon during the building design phase of each of the various aspects of the proposed Project.

57. Comment noted; no additional response is required.

58. The proposed 2018 EFMP involves redevelopment of existing facilities and other development within heavily disturbed vegetation types. A reconnaissance-level survey of biological resources was conducted on the portions of the campus that are anticipated to be affected by the proposed 2018 EFMP and the results were incorporated into the Draft EIR. As noted by the commenter in Comment 59, the survey methods and subsequent level of survey effort are sufficient for the anticipated amount of impact. A separate biological resources technical report was not prepared for the proposed Project for the same reason: the anticipated amount of impact to biological resources is limited and the analysis provided in the Draft EIR Biological Resources Section 4.3 is sufficient.

59. Comment noted; no additional response is required.

60. Based on review of the Draft EIR and the current 2019 State CEQA Guidelines, the existing text reflects the recent updates to the Thresholds of Significance in Appendix G of the CEQA Guidelines.

61. Comment noted; no additional response is required.

62. Potential impacts to California walnut groves are identified as “potentially significant” on page 4.3-26 in the Direct Impacts analysis for the 2018 Educational and Facilities Master Plan section. It is also stated on page 4.3-27 under the Level of Significance Prior to Mitigation heading. Potential significant impacts to California walnut groves are not identified in the Direct Impacts analysis in the Project-Specific section. The proposed project activities analyzed in the Project-Specific section do not include all the activities identified in the 2018 Educational and Facilities Master Plan section; the proposed activities with potential to affect California walnut groves would only occur as part of the 2018 Educational and Facilities Master Plan portion of the project.

63. In response to this comment, the following text has been modified, on page 4.3-33, the text of MM BIO-1. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

Focused special status plant surveys will be conducted in habitat suitable for **intermediate mariposa lily (*Calochortus weedii* var. *intermedius*)** ~~special status plant species~~ in the survey area within two years prior to any ground disturbance at that location. Focused surveys shall be conducted by qualified Biologists and shall be conducted per the most current CNPS protocol and during the appropriate blooming period for **the species, specifically May through July** ~~each potentially occurring special status plant species~~. If **intermediate mariposa lily** ~~special status plant species~~ ~~are~~ is not found within the proposed Project impact area, no further mitigation would be required. If **the** ~~special status plant species~~ ~~are~~ **is** detected within impact areas, an Avoidance and Mitigation Plan will be developed and implemented by Mt. SAC prior to project implementation. The Avoidance and Mitigation Plan would include on-site translocation of any bulbs of ~~special status plant~~ **the** species within the impact area.

64. Please refer to the responses to comments 60 and 63; no additional response is required.



# COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
www.fire.lacounty.gov

*"Proud Protectors of Life, Property, and the Environment"*

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April 29, 2019

Mikaela Klein, Senior Facilities Planner  
Mt. San Antonio College  
Facilities Planning and Management  
1100 North Grand Avenue  
Walnut, CA 91789

Dear Ms. Klein:

### **NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "MT. SAN ANTONIO COLLEGE 2018 EDUCATIONAL AND FACILITIES MASTER PLAN," INVOLVES FACILITIES, SITE, AND INFRASTRUCTURE IMPROVEMENTS, WALNUT, FFER 201900036**

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

#### **PLANNING DIVISION:**

Section 4.13.2 Fire Protection and Emergency Services, the first sentence in paragraph one should be revised to state that the City of Walnut and Mt. SAC are within the jurisdiction and are part of the Consolidated Fire Protection District of Los Angeles County (CFPD), also known as the Los Angeles County Fire Department (LACoFD). The LACoFD provides fire protection, emergency medical (EMS), and related services to both the City and the college and there are no contracts for services required. In addition, the second sentence should be clarified to state that while there are two fire stations physically located within the City, the City receives fire, EMS, and related services from the closest available LACoFD resources regardless of municipal boundaries.

1

#### SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY

CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY  
DIAMOND BAR  
DUARTE

EL MONTE  
GARDENA  
GLENORA  
HAWAIIAN GARDENS  
HAWTHORNE  
HERMOSA BEACH  
HIDDEN HILLS  
HUNTINGTON PARK

INDUSTRY  
INGLEWOOD  
IRWINDALE  
LA CANADA-FLINTRIDGE  
LA HABRA  
LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER

LAWNDALE  
LOMITA  
LYNWOOD  
MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES

PARAMOUNT  
PICO RIVERA  
POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

In paragraph two, sentence two, Fire Station 146's service area is actually over five miles, however, this sentence would be correct in simply stating that the Mt. SAC campus is located within Fire Station 146's jurisdiction. Sentence four should be revised to state that Fire Station 146 is a critical coverage station meaning that if the engine company is on an incident anticipated to last longer than 30 minutes, the station must be covered by a move-up company, regardless if the incident is within or outside District-served areas. It should be noted that the City of Diamond Bar is part of the CFPD as well, thus mutual aid is not applicable to that city. Also, sentence six should be revised to state that if Engine 146 is dispatched to an emergency incident anticipated to last longer than 30 minutes, another engine company will be deployed to Fire Station 146 to respond to emergencies that might occur within its service area.

2

Paragraph three, sentence one should be corrected to state that Fire Station 61 is approximately three driving miles from the Mt. SAC campus.

3

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or [Loretta.Bagwell@fire.lacounty.gov](mailto:Loretta.Bagwell@fire.lacounty.gov).

**LAND DEVELOPMENT UNIT:**

The Land Development Unit is reviewing the proposed "MT. SAN ANTONIO COLLEGE 2018" for access and water system requirements. The Land Development Unit comments are only general requirements. Specific fire and life safety requirements will be addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

**ACCESS REQUIREMENTS:**

1. The proposed development will require multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
  - a. The Fire Apparatus Access Road shall be cross-hatch on the site plan with the width clearly noted on the plan.
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width.

4

The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

4. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.
5. The edge of the Fire Apparatus Access Road shall be located a minimum of 5 feet from the building or any projections there from.
6. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
7. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.
8. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the Aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.
9. If the Fire Apparatus Access Road is separated by an island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.
10. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Include the dimensions of the turnaround with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.
11. Fire Department Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside, and outside turning radii for each change in direction on the site plan.
12. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 lbs. and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.

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13. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector.
14. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Clearly identify firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width on the site plan.
15. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Fire Code Section 503.2.1 shall be maintained at all times.
16. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the Fire Code official.
17. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Clearly indicate the height of all parapets in a section view.
18. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.
19. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.

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**WATER SYSTEM REQUIREMENTS:**

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the 2017 County of Los Angeles Fire Code.

2. The development may require fire flows up to 4,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, the installation of an automatic fire sprinkler systems, and type(s) of construction used.
3. The fire hydrant spacing shall be every 300 feet for both the public and the on-site hydrants. The fire hydrants shall meet the following requirements:
  - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
  - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
  - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
4. All required public fire hydrants shall be installed and tested prior to beginning construction.
5. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy.
  - a. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation.
6. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

Additional Department requirements will be determined by Fire Prevention Engineering at further development of the site.

For any questions regarding the report, please contact Acting SFPEA Claudia Soiza at (323) 890-4243 or [Claudia.soiza@fire.lacounty.gov](mailto:Claudia.soiza@fire.lacounty.gov).

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

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Cont.

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Mikaela Klein, Senior Facilities Planner  
April 29, 2019  
Page 6

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

MYT:ac

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Cont.

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Letter County of Los Angeles Fire Department  
Michael Y Tekeshita  
April 29, 2019

## Response to Comments

1. In response to this comment, the first paragraph under Section 4.13.2 Environmental Setting, Fire Protection and Emergency Services, Los Angeles County Fire Department, on page 4.13-4 of the EIR has been revised. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

The **City of Walnut and Mt. SAC are within the jurisdiction and are part of the Consolidated Fire Protection District (CFPD), also known as the** Los Angeles County Fire Department (LACoFD). **The LACoFD provides fire protection, emergency medical** ~~Emergency Medical Services (EMS), fire and rescue services, and “safe haven” services for unincorporated Los Angeles County, contract with cities including the City of Walnut, and Mt. SAC~~ **and related services to both the City and the college and there are no contracts for services required.** Two fire stations ~~serve~~ **are physically located in** the City of Walnut: Fire Station No. 146 and Fire Station No. 61; **however, the City receives fire, EMS, and related services from the closest available LACoFD resources regardless of municipal boundaries** (City of Walnut 2018b).

2. In response to this comment, the second paragraph under Section 4.13.2 Environmental Setting, Fire Protection and Emergency Services, Los Angeles County Fire Department, on page 4.13-4 of the EIR has been revised. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

Fire Station No. 146 is located at 20604 Loyaltan Drive, approximately 0.25-mile driving distance from the Mt. SAC campus (corner of Temple Avenue and Grand Avenue). The Mt. SAC campus is located within the ~~4-mile~~ Fire Station Service Area for Station No. 146. The station serves the City of Walnut and is the primary responder for the Mt. SAC campus (City of Walnut 2018a). This Station is ~~known as~~ a Critical **Coverage** Station, which means it ~~responds to emergencies in the City of Walnut and provides mutual aid to other cities, such as West Covina and Diamond Bar as well as other areas including Orange County~~ **that if the engine company is on an incident anticipated to last longer than 30 minutes, the station must be covered by a move-up company, regardless if the incident is within or outside District-served areas. The City of Diamond Bar is also part of the CFPD, thus mutual aid is not applicable to that City.** This station has one fire engine and a barn-type structure to store the fire apparatus. If a ~~mutual aid emergency would require services from Station No.~~ **Engine 146 is dispatched to an emergency incident anticipated to last longer than 30 minutes** ~~for a period exceeding one-half hour, another engine~~ **company will be** is deployed to this ~~s~~Station **No. 146** ~~so that a unit is available to respond to other emergencies that might occur within the~~ **its** service area (City of Walnut 2018b).

3. In response to this comment, the first sentence of the third paragraph under Section 4.13.2 Environmental Setting, Fire Protection and Emergency Services, Los Angeles

County Fire Department, on page 4.13-4 of the EIR has been revised. Deleted text is shown as ~~strike through~~ and new text is shown as **bold** and underline.

Fire Station No. 61 is located at 20011 La Puente Road, approximately ~~2~~ **3** miles driving distance from the Mt. SAC campus (corner of Temple Avenue and Grand Avenue).

4. In response to the comment requiring the project to comply with all applicable code and ordinance requirements, the commenter is referred to the text contained on page 4.13-12 of the EIR that states that “Development of the proposed 2018 EFMP would be required to comply with all applicable code and ordinance requirements including but not limited to construction, access, water mains, fire flows, and fire hydrants”. No further response is required.
5. In response to the comment requesting that impacts related to erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance, the commenter is referred to the analysis contained in the EIR that addresses these topics, as applicable. Specifically, please refer to Sections 4.6, Geology and Soils, and 4.9, Hydrology and Water Quality, for analysis related to erosion control and watershed management; Section 4.3, Biological Resources, for analysis related to rare and endangered species, vegetation, and the lack of oak trees on the project site; Section 4.8, Hazards and Hazardous Materials and Wildfire, for analysis related to lack of areas classified as Very High Fire Hazard Severity Zones; and Section 4.4, Cultural Resources, for analysis related to archaeological and cultural resources.
6. Comment noted; no response is required.



# 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

Ms. Mikaela Klein  
Facilities Planning & Management  
Mt. San Antonio College  
1100 North Grand Avenue  
Walnut, CA 91789-1399

May 22, 2019  
Ref. DOC: 5005299

Dear Ms. Klein:

### **DEIR Response to the Long Range Development Plan Mount San Antonio College 2018 Educational and Facilities Master Plan**

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on April 8, 2019. The proposed project is located within the jurisdictional boundaries of District No. 21. Previous comments submitted by the Districts in correspondence dated October 2, 2018 (copy enclosed), to Mr. Gary Nellesen of your agency, still apply to the subject project with the following comments and updated information:

1. Utilities and Service Systems, *page 3-14*, first paragraph under Wastewater – The San Jose Creek Water Reclamation Plant currently processes an average flow of 58.5 million gallons per day. Edit accordingly throughout the document. 1
2. Utilities and Service Systems, *page 3-14*, first paragraph under Solid Waste – Mount San Antonio College is not in the watershed for either the Calabasas Landfill or the Scholl Canyon Landfill. 2
3. Project Background, *page 3-16*, Physical Education Project (Phases 1, 2) (PEP) – Although the PEP was previously approved and not analyzed in this document, it is important to note that the expected increase in average wastewater flow from the development of both PEP phases is 44,546 gallons per day. 3
4. 4.16.4 Environmental Impacts, *page 4.16-8*, Table 4.16-1 – Development of all phases analyzed in the DEIR anticipates a net increase of 108,839 gallons per day as calculated in the table. This total excludes the PEP phases, which have an expected increase in average wastewater flow of 44,546 gallons per day. 4
5. All other information concerning Districts’ facilities and sewerage service contained in the document is current. 5

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

Very truly yours,

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar  
Enclosure

cc: A. Schmidt  
A. Howard



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
*Chief Engineer and General Manager*

October 2, 2018

Ref. Doc. No.: 4716678

Mr. Gary Nellesen, Director  
Facilities Planning & Management  
Mt. San Antonio College  
1100 North Grand Avenue  
Walnut, CA 91789-1399

Dear Mr. Nellesen:

### **NOP Response to the Long Range Development Plan Mount San Antonio College 2018 Educational and Facilities Master Plan**

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on September 21, 2018. The proposed project is located within the jurisdictional boundaries of District No. 21. We offer the following comments regarding sewerage service:

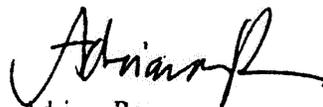
1. The Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin. For a copy of the Districts' buildover procedures and requirements go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, Will Serve Program, and click on the [Buildover Procedures and Requirements](#) link. For more specific information regarding the buildover procedure, please contact Mr. Ed Stewart at (562) 908-4288, extension 2766.
2. 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' Mount San Antonio Trunk Sewer, located in Temple Avenue east of Grand Avenue. The Districts' 15-inch diameter trunk sewer has a capacity of 4.3 million gallons per day (mgd) and conveyed a peak flow of 1.7 mgd when last measured in 2014.
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 flow of 63.8 mgd. 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.
4. The expected increase in average wastewater flow from the project, described in the notice as a net increase of 544,195 gross square feet of new structure by 2027, is 108,839 gallons per day. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org).

Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.
  
6. 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

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

Very truly yours,



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: E. Stewart  
A. Schmidt  
A. Howard



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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

Ms. Mikaela Klein  
Facilities Planning & Management  
Mt. San Antonio College  
1100 North Grand Avenue  
Walnut, CA 91789-1399

May 22, 2019  
Ref. DOC: 5005299

Dear Ms. Klein:

### **DEIR Response to the Long Range Development Plan Mount San Antonio College 2018 Educational and Facilities Master Plan**

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on April 8, 2019. The proposed project is located within the jurisdictional boundaries of District No. 21. Previous comments submitted by the Districts in correspondence dated October 2, 2018 (copy enclosed), to Mr. Gary Nellesen of your agency, still apply to the subject project with the following comments and updated information:

1. Utilities and Service Systems, *page 3-14*, first paragraph under Wastewater – The San Jose Creek Water Reclamation Plant currently processes an average flow of 58.5 million gallons per day. Edit accordingly throughout the document. ] 1
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5. All other information concerning Districts' facilities and sewerage service contained in the document is current. ] 5

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

Very truly yours,

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar  
Enclosure

cc: A. Schmidt  
A. Howard



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GRACE ROBINSON HYDE  
*Chief Engineer and General Manager*

October 2, 2018

Ref. Doc. No.: 4716678

Mr. Gary Nellesen, Director  
Facilities Planning & Management  
Mt. San Antonio College  
1100 North Grand Avenue  
Walnut, CA 91789-1399

Dear Mr. Nellesen:

### **NOP Response to the Long Range Development Plan Mount San Antonio College 2018 Educational and Facilities Master Plan**

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on September 21, 2018. The proposed project is located within the jurisdictional boundaries of District No. 21. We offer the following comments regarding sewerage service:

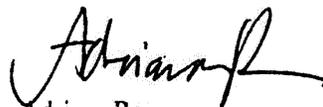
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2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Mount San Antonio Trunk Sewer, located in Temple Avenue east of Grand Avenue. The Districts' 15-inch diameter trunk sewer has a capacity of 4.3 million gallons per day (mgd) and conveyed a peak flow of 1.7 mgd when last measured in 2014.
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 flow of 63.8 mgd. 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.
4. The expected increase in average wastewater flow from the project, described in the notice as a net increase of 544,195 gross square feet of new structure by 2027, is 108,839 gallons per day. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org).

Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.
  
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If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: E. Stewart  
A. Schmidt  
A. Howard

**Letter** County Sanitation Districts of Los Angeles County  
Adriana Raza  
May 22, 2019

## **Response to Comments**

1. In response to this comment, the following text has modified in the second sentence under Wastewater on page 3-14. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

The WRP has a capacity of 100 million gallons per day (mgd) and currently processes an average flow of ~~63.8~~ **58.5** mgd (approximately ~~64~~ **58.5** percent of capacity).

The following text has been modified, on page 4.16-6, the last sentence of the first paragraph under Wastewater. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

The WRP has a capacity of 100 million gallons per day (mgd) and currently processes an average flow of ~~63.8~~ **58.5** mgd (approximately ~~64~~ **58.5** percent of capacity) (LACSD 2018).

The following text has been modified, on page 4.16-9, the last sentence of the second paragraph. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

As previously indicated, the San Jose Creek WRP has a capacity of 100 million gallons per day (mgd) and currently processes an average flow of ~~63.8~~ **58.5** mgd (approximately ~~64~~ **58.5** percent of capacity) and has adequate capacity to serve the proposed 2018 EFMP.

The following text has been modified, on page 4.16-13, the second sentence under Threshold 16.3. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

The increase in wastewater from the proposed Project would represent less than one percent of the existing excess daily capacity of the San Jose Creek WRP, which has a capacity of 100 mgd and currently processes an average flow of ~~63.8~~ **58.5** mgd.

2. Comment noted; no additional response is required.
3. In response to this comment, the following text has been added as a new paragraph following the last paragraph under Physical Education Project (Phases 1, 2) (PEP). New text is shown as **bold** and underline.

**It is also important to note that the expected increase in average wastewater flow from the development of Phases 1 and 2 of the Physical Education Project (PEP) is 44,546 gallons per day.**

4. In response to this comment, the following text has been added following the third sentence under Water and Wastewater Treatment. New text is shown as **bold** and underline.

Table 4.16-1, below, shows the projected net water demand broken down by building and phase using 200 gpd/ksf, which results in a total new water demand of 108,839 gpd or 122 acre-feet per year (AFY). **It is noted that this total excludes the PEP phases, which have an expected increase in average wastewater flow of 44,546 gallons per day.**

5. Comment noted; no additional response is required.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

May 22, 2019

Mikaela Klein  
Senior Facilities Planner  
Facilities Planning and Management  
Mt. San Antonio College  
1100 N. Grand Avenue  
Walnut, CA 91780

RE: Long Range Development Plan Mt. San  
Antonio College 2018 Educational and  
Facilities Master Plan  
SCH# 2018091004  
GTS# 07-LA-2018-02406  
Vic. LA-10/ PM 40.106  
Vic. LA-57/ PM 5.085

Dear Ms. Klein:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Mt. San Antonio College 2018 Educational and Facilities Master Plan and associated 2017 Parking and Circulation Master Plan (EFMP) is the College's long-range development plan and also serves as the foundation for other components of the College's integrated planning process. Among other purposes, the EFMP projects Mt. SAC's overall growth and the growth of programs and services during the planning horizon and develops recommendations for site and facilities improvements that are informed by educational planning. The plan would involve construction of approximately 10 new major buildings/facilities, the removal/demolition of 33 aged or temporary facilities, major renovations, minor new construction and renovation projects, and campus-wide site and infrastructure projects. Additionally, the project will analyze the construction and operation of certain projects implementing the EFMP at a project-specific level. These projects may include: the Student Center, the Bookstore, Parking Structure R and Tennis Courts, Parking Structure S, Sand Volleyball Courts, and a replacement Communication Tower at Reservoir Hill.

As Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining 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." After reviewing the Draft Environmental Impact Report (DEIR) and the Traffic Impact Analysis (TIA) for the Long Range Development

Plan Mt. San Antonio College 2018 Educational and Facilities Master Plan (EFMP), Caltrans has the following comments:

The proposed EFMP identifies the framework for the uses and development on campus, specifically, 13 physical development projects near state facilities, State Route 57 (SR-57) and State Route 60 (SR-60). After reviewing the EFMP's Traffic Impact Analysis, SR-57 and SR-60 were deemed to have insignificant impact. However, based on field reviews conducted on May 9, 2019 and May 17, 2019 to observe AM/PM peak hour volume and ramp storage capacity (queuing), we have the following comments:

- Intersection 14:
  - Please provide conflict analysis (queue analysis) at southbound SR-57 off-ramp to Temple Avenue. Based on field observation, we believe that increased vehicular trip travel to this off-ramp during PM peak hours would significantly impact the off-ramp storage capacity and would create additional queuing and vehicle displacement issue.
- Intersection 28:
  - Due to the SR-57/SR-60 Confluence project, which proposes to realign eastbound SR-60 ramps at Grand Avenue, please re-evaluate Traffic movement counts at SR-60 off-ramp to Grand Avenue.

Caltrans acknowledges the Lead Agency's consideration of fair share contributions and multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation, thereby reducing VMT. As referenced in our letter responding to the Notice of Preparation (NOP) for the DEIR dated October 4, 2019, we encourage the Lead Agency to not only consider the reduction of VMT, but also, the reduction of vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality.

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

We look forward to your cooperation and reviewing any proceeding documents related to this project. If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at [carlo.ramirez@dot.ca.gov](mailto:carlo.ramirez@dot.ca.gov) and refer to GTS# 07-LA-2018-02406.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

Cc: Scott Morgan, State Clearinghouse

Letter Department of Transportation, District 7  
 Miya Edmonson  
 May 22, 2019

**Response to Comments**

1. In response to this comment, queue analysis has been added in Section 5.5 (existing year), Section 6.5 (Interim Year), and Section 7.5 (Buildout Year). New text is shown as **bold** and underline.

**5.5 EXISTING YEAR QUEUE ANALYSIS**

**At the request of Caltrans, the southbound off-ramp queue was evaluated for SR-57 at Temple Avenue due to concerns that the added traffic may affect the storage capacity. The off-ramp currently includes approximately 600 feet of storage across three lanes, including a left turn lane, a shared left turn/right turn lane, and a right turn lane.**

**Beyond the three lane section, two lanes continue for approximately 740 feet, for a total storage of approximately 1,340 feet. In addition, the outside off-ramp lane is an exclusive lane; the second off-ramp lane is shared with traffic continuing southbound on SR-57.**

**The 95<sup>th</sup> percentile queues for existing and existing plus project conditions were taken from Synchro and are shown in Table 9 along with the approximate storage for each lane. The Synchro reports are included in Appendix C.**

**As seen in the table, the existing SR-57 southbound off-ramp queues at Temple Avenue with and without the project are expected to be adequately served with the existing storage. In addition, the project is expected to have a minimal impact on queue length.**

**Table 9. Existing Year Queues for SR-57 SB Off-Ramp at Temple**

Scenario	Peak Hour	Queue (feet)		
		LT	LT-RT	RT
Existing	AM	371	392	303
	PM	867	906	310
Existing + Project	AM	378	406	326
	PM	867	915	355
<b>Storage (feet)</b>		<b>1,340</b>	<b>1,340</b>	<b>600</b>

**6.5 INTERIM YEAR (2021) QUEUE ANALYSIS**

**The southbound off-ramp queue was again evaluated for SR-57 at Temple Avenue for the interim year with and without the project. The 95<sup>th</sup> percentile queues for 2021 cumulative conditions with and without the project were taken from Synchro and are shown in Table 12 along with the approximate storage for each lane. The Synchro reports are included in Appendix D.**

**Table 12. Interim Year (2021) Queues for SR-57 SB Off-Ramp at Temple Avenue**

Scenario	Peak Hour	Queue (feet)		
		LT	LT-RT	RT
2021 No Project	AM	381	408	320
	PM	887	941	407
2021 + Project	AM	388	410	328
	PM	887	943	427
Storage (feet)		1,340	1,340	600

**As seen in the table, the SR-57 southbound off-ramp queues at Temple Avenue with and without the project are expected to be adequately served with the existing storage. In addition, the project is expected to have a minimal impact on queue length.**

**7.5 BUILDOUT YEAR (2027) QUEUE ANALYSIS**

**The southbound off-ramp queue was evaluated for SR-57 at Temple Avenue for the buildout year with and without the project. The 95<sup>th</sup> percentile queues for 2027 cumulative conditions with and without the project were taken from Synchro and are shown in Table 15 along with the approximate storage for each lane. The Synchro reports are included in Appendix E.**

**Table 15. Buildout Year (2027) Queues for SR-57 SB Off-Ramp at Temple Avenue**

Scenario	Peak Hour	Queue (feet)		
		LT	LT-RT	RT
2027 No Project	AM	414	440	344
	PM	990	1,030	370
2027 + Project	AM	430	462	357
	PM	990	1,039	417
Storage (feet)		1,340	1,340	600

**As seen in the table, the SR-57 southbound off-ramp queues at Temple Avenue with and without the project are expected to be adequately served with the existing storage. In addition, the project is expected to have a minimal impact on queue length.**

2. In response to this comment, Section 3.1 of the traffic study was updated. The improvements at the Grand Avenue/SR-60 EB Ramps were already considered for 2027 conditions (assuming the construction would be completed sometime between 2021 and 2027), but it was not stated clearly in the traffic report. New text is shown as **bold** and underline.
  - Buildout (2027) Cumulative Conditions
    - Includes Transit Center
    - Roadway geometry changes include:
      - New exclusive eastbound right turn lane at Temple Avenue/Bonita Drive associated with the Physical Education Project (Phase 1,2)
      - New traffic signal at Temple Avenue/Transit Center access
      - New south leg at Temple Avenue/Transit Center access
      - Exclusive eastbound and westbound right turn lanes at Temple Avenue/Transit Center access
      - **Completed improvements at Grand Avenue and the SR-60 EB Ramps**
3. Comment is noted, and although it is agreed that reduced vehicle speeds are beneficial to pedestrian and bicyclist safety, Mt. SAC has no input on speed limits. No additional response is required.
4. Comment noted; no additional response is required.

**From:** [Toan Duong](#)  
**To:** [Facilities Planning](#)  
**Cc:** [Kent Tsujii](#); [Jeff Pletyak](#); [Jose Suarez](#)  
**Subject:** DEIR MTSAC 2018 Educational and Facilities Master Plan  
**Date:** Thursday, May 23, 2019 1:22:15 PM

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[EXTERNAL SENDER]

Ms. Mikaela Klein, Senior Facilities Planner  
Mt. San Antonio College  
Facilities Planning and Management

Thank you for the opportunity to review the Draft Environmental Impact Report for the subject project. The following comment from Los Angeles County Public Works is for your consideration:

1. Page 4.14-39, Transportation/Traffic, MM TRA-1, Cameron Avenue and Grand Avenue: MM 21stated, *"Add a second eastbound right turn lane. This will only require restriping and will not require any physical improvements."*

The improvements proposed do not appear to be feasible within the existing street right of way and improvements. Please provide a concept drawing for the proposed mitigation improvements for the one impacted County intersection of Cameron Avenue and Grand Avenue to Public Works, Traffic Safety and Mobility Division for review and approval.

If you have any questions regarding the above comments, please contact Mr. Kent Tsuji at (626) 300-4776 or [ktsuji@dpw.lacounty.gov](mailto:ktsuji@dpw.lacounty.gov).

We request the opportunity to review the future environmental document when it is available. If you have any question or require additional information, please contact me or Mr. Jose Suarez at (626) 458-4921 or [jsuarez@dpw.lacounty.gov](mailto:jsuarez@dpw.lacounty.gov).

Very truly yours,

Toan Duong  
Civil Engineer  
Los Angeles County Public Works  
Office: (626) 458-4921

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**Letter** Los Angeles County Public Works  
May 23, 2019

### **Response to Comment**

1. In response to this comment, MM TRA-1 #21 in Section 4.17.7 Mitigation Measures has been revised to remove the indication that the improvement will only require striping. Deleted text is shown as ~~striketrough~~. This mitigation measure has been identified in previous studies and the proposed 2018 EFMP EIR project will contribute a fair share of the cost to the improvement as indicated in the traffic study for the EIR should the County elect to comply with the mitigation measure as listed. The design of mitigation measures is not typically included in an EIR document.

#### 21. Cameron Avenue and Grand Avenue

- Add a second eastbound right turn lane. ~~This will only require restriping and will not require any physical improvements.~~



# South Coast Air Quality Management District

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(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

[facilitiesplanning@mtsac.edu](mailto:facilitiesplanning@mtsac.edu)

Mikaela Klein, Senior Facilities Planner

Facilities Planning & Management

Mt. San Antonio College

1100 N. Grand Avenue

Walnut, CA 91789-1399

May 21, 2019

**Draft Environmental Impact Report (Draft EIR) for the Proposed  
Long-Range Development Plan Mt. San Antonio College 2018 Educational and Facilities Master  
Plan Project (SCH No.: 2018091004)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

**South Coast AQMD Staff's Summary of Project Description**

The Lead Agency proposes to demolish 33 buildings totaling 207,805 square feet, construct 13 new buildings totaling 752,000 square feet, and renovate nine existing buildings totaling 405,023 square feet with four parking structures on 418.44 acres (Proposed Project). The Proposed Project is located on the southeast corner of North Grand Avenue and Mountaineer Road within the City of Walnut. Construction is anticipated to begin in 2019 and will occur in three phases (Phases 1A, 1B, and 2) over a 10-year period with overlapping construction and operational years. The Proposed Project is anticipated to be fully operational by 2027<sup>1</sup>. The Proposed Project will be designed to address the goals of the Mt. San Antonio College (Mt. SAC) 2018 Climate Action Plan (2018 CAP)<sup>2</sup> with implementation of features such as the Leadership in Energy and Environmental Design (LEED) Silver standards, and the 2016 Title 24 California Green Building Standards Code<sup>3</sup>.

**South Coast AQMD Staff's Summary of Air Quality Analysis**

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions for Phases 1A and 1B of the Proposed Project and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction air quality impacts from Phases 1A and 1B would be significant for NOx at 241 pounds per day (lbs/day)<sup>4</sup>. However, with the implementation of Mitigation Measure (MM) AQ-1, which requires that all off-road diesel-powered construction equipment greater than 50 horsepower (hp) meet Tier 4 standards<sup>5</sup>, construction-related NOx emissions would be reduced to 54 lbs/day<sup>6</sup>, which is below South Coast AQMD's air quality CEQA significance threshold for construction. The Lead Agency also found that the Proposed Project's operational air quality impacts from Phases 1A and 1B would be less than significant<sup>7</sup>. Based on the findings of significance for the construction and operational analyses for Phases

<sup>1</sup> Draft EIR. Section 1. Executive Summary. Page 1-4.

<sup>2</sup> Draft EIR. Project Description. Pages 3-43 through 47.

<sup>3</sup> *Ibid.* Section 4.2. Air Quality. Page 4.2-7.

<sup>4</sup> *Ibid.* Page 4.2-20.

<sup>5</sup> *Ibid.* Page 4.2-26

<sup>6</sup> *Ibid.*

<sup>7</sup> *Ibid.* Page 4.2-21 through 20.

1A and 1B, the Lead Agency found that emissions from Phase 2 would be comparable to the earlier phases, and therefore less than significant with the implementation of MM AQ-1<sup>8</sup>.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. The Lead Agency did not quantify regional or localized construction emissions from Phase 2 and did not analyze a scenario where construction activities of one development phase overlap with operational activities of one or two development phases. Please see the attachment for more information. Should the Lead Agency find that, after revisions to the Air Quality Analysis, the Proposed Project will have significant air quality impacts, then mitigation measures will be required. The attachment includes a list of potential mitigation measures as guidance to the Lead Agency that should be reviewed for incorporation in the Final EIR. The attachment also includes recommendations to include discussions of South Coast AQMD rules applicable to the Proposed Project in the Final EIR.



1

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
LS:AM  
LAC190409-14  
Control Number

<sup>8</sup> *Ibid.* Pages 4.2-18 through 26.

## ATTACHMENT

**Air Quality Impact Analysis – Construction Impact Analysis**

1. The Lead Agency quantified the Proposed Project's construction emissions from Phases 1A and 1B, and found that emissions would not be significant with the implementation of MM AQ-1, which requires that all off-road diesel-powered construction equipment greater than 50 horsepower (hp) meet Tier 4 standards. The Lead Agency did not quantify construction emissions from Phase 2 activities. The Lead Agency stated that "[...] construction details for Phase 2 are too speculative to be quantified at this time"<sup>9</sup>. Further, the Lead Agency found that "Phase 2 emissions are likely to be comparable to or less than Phase 1A and 1B emissions [...] and would be required to comply with MM AQ-1 to reduce impacts to less than significant"<sup>10</sup>.

When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). South Coast AQMD staff recommends that the Lead Agency quantify the Proposed Project's construction emissions and compare those emissions to South Coast AQMD's regional air quality CEQA significance thresholds for construction to determine the level of significance. The Lead Agency should use the current version of California Emission Estimator Model (CalEEMod)<sup>11</sup> to quantify construction emissions.

As discussed in Section 3.5.3 "Buildings/Facilities" in the Draft EIR, the Lead Agency has identified the estimated development potential of the Proposed Project. For example, in this section, the Lead Agency discussed New Major Buildings, Major Renovations, and Minor Projects that are proposed as part of Phase 2 of the Proposed Project. These include, but are not limited to, new construction of 75,000-square-foot auditorium, a 15,000-square-foot campus safety facility, a 75,000-square-foot student services building, 200,000 square feet of new academic buildings, and renovations to 347,870 square feet of existing academic buildings<sup>12</sup>. Therefore, based on the development potential for Phase 2 that is already known at the time the Draft EIR is prepared, the Lead Agency can and should use its best efforts to identify construction activities that would be required to implement Phase 2 of the Proposed Project and quantify associated construction emissions, including emissions from any demolition activities. Otherwise, there is no substantial evidence to support that Phase 2 of the Proposed Project would be comparable to Phases 1A and 1B and the Lead Agency's finding that Phase 2's construction air quality impacts can and would be reduced to less than significant with just the implementation of MM AQ-1. The recommended analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the kind, size, scope, intensity, duration, and location of construction activities in Phase 2 to foster meaningful public participation and informed decision making.

<sup>9</sup> Draft EIR. Section 4.2 Air Quality. Page 4.2-19.

<sup>10</sup> *Ibid.* Page 4.2-20.

<sup>11</sup> South Coast AQMD. CalEEMod Version 2016.3.2. Accessed at: <http://www.aqmd.gov/caleemod/download-model>.

<sup>12</sup> Draft EIR. Section 3 Project Description. Page 3-28.

**Air Quality Impact Analysis – Overlapping Construction and Operational Impacts**

2. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not consider nor analyze a scenario where construction activities overlap with operational activities (e.g., one phase implementing the Proposed Project is operational while another phase implementing the Proposed Project is under construction). Since implementation of the Proposed Project is expected to occur over a multi-year timeframe of 10 years from 2019 to 2027<sup>13</sup>, an overlapping construction and operation scenario is reasonably foreseeable, unless the Proposed Project includes requirement(s) that will prohibit overlapping construction and operational activities. To conservatively analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping construction and operational years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to South Coast AQMD’s air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR.

3

**Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis**

3. The Lead Agency quantified the Proposed Project’s localized construction emissions from Phases 1A and 1B, and using the LSTs at 25 meters for Source Receptor Area 10, found that localized construction air quality impacts would not be significant<sup>14</sup>. The Lead Agency did not quantify localized construction emissions from activities implementing Phase 2 of the Proposed Project. The Lead Agency stated that, “[e]missions from Phase 2 emissions would be comparable to or less than the emissions generated from overlapping phasing of Phases 1A and 1B, and the receptors would be greater than the 25-meter-threshold used in this analysis. Therefore [...] localized emissions would be less than the respective LST threshold for Phase 2”<sup>15</sup>.

4

The Proposed Project is surrounded by sensitive receptors<sup>16</sup>. South Coast AQMD staff recommends that the Lead Agency use its best efforts, based on the estimated development potential that is already available at the time the Draft EIR is prepared such as the maximum build-out of nonresidential uses in square feet<sup>17</sup>, to quantify localized construction emissions from Phase 2 and disclose the localized air quality impacts in the Final EIR. South Coast AQMD guidance for performing a localized air quality analysis is available on South Coast AQMD website<sup>18</sup>.

**Additional Recommended Mitigation Measures**

4. In the event that, upon revisions to the Air Quality Analysis based on Comment Nos. 1 to 3, the Lead Agency finds that the Proposed Project would result in significant adverse air quality impacts from construction, mitigation would be required (CEQA Guidelines Section 15126.4.). Therefore, South Coast AQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist in the identification of feasible mitigation measures for incorporation in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD’s CEQA Air Quality Handbook website<sup>19</sup>.

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<sup>13</sup> Draft EIR. Section 1. Executive Summary. Page 1-4.

<sup>14</sup> *Ibid.* Section 4.2 Air Quality. Page 4.2-21.

<sup>15</sup> *Ibid.*

<sup>16</sup> *Ibid.*

<sup>17</sup> Draft EIR. Section 3 Project Description. Page 3-28.

<sup>18</sup> South Coast AQMD. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>19</sup> South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

*Mitigation Measures for Construction Air Quality Impacts*

- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent<sup>20</sup>. Since the construction schedule of the Proposed Project extends beyond 2023 till 2027, 2010 model year trucks will be required for the Proposed Project and should become more widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Early implementation of the Truck and Bus Regulation at the Proposed Project will develop a construction management plan to prefer construction contractor(s) who can supply 2010 model year trucks, help facilitate the transition to 2010 model year trucks in 2023, provide time and opportunities to resolve implementation challenges ahead of 2023, ease the costs and burden of regulatory compliance, and yield emission reductions from fleets earlier than 2023.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

<sup>20</sup> California Air Resources Board. December 20, 2018. <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Restrict non-essential diesel engine idle time to not more than five consecutive minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, include the idling requirement in the training materials for drivers, operators, and vendors, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

5  
cont.

#### **Responsible Agency, Permits, and Compliance with South Coast AQMD Rules**

5. Implementation of the Proposed Project may require permits from South Coast AQMD. If operation of the Proposed Project will involve the use of stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), South Coast AQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines<sup>21</sup> and South Coast AQMD Rule Series 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters<sup>22</sup>, including Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters<sup>23</sup> and Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters<sup>24</sup> would apply and should be discussed in the Air Quality Section of the Final EIR. Therefore, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD Permitting and Engineering staff as early as feasible to determine permit requirements and any applicable rules and regulations that should be discussed in the CEQA document for the Proposed Project. Additionally, in the event that the Proposed Project will use new stationary equipment that requires a permit from South Coast AQMD, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final EIR. Questions on permits and applicable South Coast AQMD rules can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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<sup>21</sup> South Coast AQMD. Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

<sup>22</sup> South Coast AQMD. Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146.pdf>.

<sup>23</sup> South Coast AQMD. Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf>.

<sup>24</sup> South Coast AQMD. Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf>.

**Letter** South Coast Air Quality Management District  
Lijin Sun, J.D.  
May 21, 2019

## **Response to Comments**

1. The first two pages of the SCAQMD's comment letter provides summaries of both the project description and air quality analysis conducted for the Project as well as a summary of the SCAQMD's general comments. Because the SCAQMD's comment letter provides an attachment with an elaboration of the general comments, responses to the comments in the attachment will be addressed in the following responses.
2. The commenter states the need to quantify Phase 2 emissions. Mt. SAC has focused on those individual projects within Phase 1A and 1B of the EFMP that they are seeking environmental impact disclosure as per the requirements of CEQA. It is explicitly stated on pages 2-3 and 2-4 of the Section 2, Introduction, "At the design approval stage, Mt. SAC will evaluate each individual project to determine whether it is within the scope of the program described and evaluated in this Draft EIR and to determine what, if any, additional environmental documentation pursuant to CEQA is needed." Further, on page 3-22, "As discussed in Section 2, Introduction, this Draft EIR addresses the impacts resulting from construction and operation of the proposed 2018 EFMP as a long-range planning and development plan at a "program level" (Phases 1A, 1B and 2), including components that were included in previous Facilities Master Plans but not yet implemented." The following paragraphs/text on the top of page 3-23 define the five "projects" within Phases 1A and 1B that are evaluated on a "project level" basis. Therefore, project-level analyses included in Phase 2 that is not defined in this list of five projects would be subject to future consideration for additional CEQA documentation.
3. The commenter states the need to assess overlapping construction and operations phases impacts. Pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance. Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (State CEQA Guidelines, Section 15064.7[c]). The Mt. SAC Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact's level of significance. Mt. SAC's Thresholds of Significance for air quality emissions are categorized into two types of projects: "multiple projects", and "site-specific projects for single projects" (Mt. SAC 2016).

Per Mt. SAC's guidelines, an air quality impact for multiple projects would occur if the SCAQMD thresholds were to be exceeded based upon the net trip increase from baseline to buildout, which is based on fall student enrollment headcount increases. Therefore, a significant impact would occur if the operational thresholds were exceeded for the totality of operational phase emissions from these projects. As such, the use of a combined construction and operational phase emissions analysis would not be consistent with the significance threshold for multiple projects adopted by Mt. SAC which serves the lead agency for the 2018 EFMP.

In response to this comment, the text on page 4.2-19 of the EIR, last paragraph, has been revised to elaborate on Mt. SAC's adopted Thresholds of Significance. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

Pursuant to Section 15064.7 of the State CEQA Guidelines, Mt. SAC has an adopted set of Thresholds of Significance. Furthermore, “when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence” (State CEQA Guidelines, Section 15064.7[c]). The Mt. SAC Thresholds of Significance are intended to provide additional clarity and specific quantitative guidance to the Environmental Checklist questions found in Appendix G of the State CEQA Guidelines and to assist in determining an impact’s level of significance. Mt. SAC’s Thresholds of Significance for air quality emissions are categorized into two types of projects: “multiple projects”, and “site-specific projects for single projects”. Therefore, per Mt. SAC’s guidelines, an air quality impact for multiple projects would occur if the SCAQMD thresholds were to be exceeded based on the net trip increase from baseline to buildout, which is based on fall student enrollment headcount increases. Therefore, a significant impact would occur if the operational threshold was exceeded for the totality of emissions from these projects. As such, the construction emissions provided for Phases 1A and 1B are provided in the air quality analysis for informational purposes and to assess the magnitude of emissions generated by the known components of Phases 1A and 1B. A project with daily emission rates below the SCAQMD’s established air quality significance thresholds (shown in Table 4.2-4) would have a less than significant effect on regional air quality, consistent with Mt. SAC’s thresholds of significance. The proposed 2018 EFMP emissions were estimated using the CalEEMod version 2016.3.2 computer program (CAPCOA 2016). The proposed Project identifies the framework for the uses and development of land on campus necessary to accommodate an identified level of enrollment and physical development. However, enrollment decisions and the actual implementation of specific capital projects are influenced by multiple factors, including funding decisions, demographics, and other factors external to the proposed Project process. Thus, while the proposed Project identifies the physical resources necessary to meet Mt. SAC’s mission and its long-range development plans, it makes no commitments regarding the timing for achieving identified enrollment projections or implementing physical development. Due to the availability of Phase 1A and 1B specific construction information and to assess the magnitude of air quality emissions to be generated by known components of Phases 1A and 1B, the construction of Phases 1A and 1B were quantified for this analysis and provided for informational purposes. ~~Specifically, construction details for Phase 2 are too speculative to be quantified at this time.~~ However, as detailed in Section 2, Introduction, Phase 2 components will be subject to future additional CEQA analyses. In future CEQA analyses, Phase 2 construction emissions will be compared to construction thresholds of significance as a “site-specific project.”

4. The commenter states that Localized Significance Thresholds (LSTs) should be conducted for Phase 2 projects. As per the response to Comment 1, Phase 2 projects would be evaluated in future CEQA documents relative to air quality.

The following clarification is been provided in the text on the first paragraph on page 4.2-21 of Section 4.2, Air Quality focus on Phase 1A and 1B projects and remove references to individual Phase 2 projects. Deleted text is shown as ~~strikethrough~~ and new text is shown as **bold** and underline.

In accordance with the Mt. SAC CEQA Thresholds of Significance, the proposed 2018 EFMP does not require preparation of analysis pursuant to the SCAQMD localized significance threshold (LST) methodology. However, for informational purposes, Table 4.2-7 provides an LST analysis consistent with SCAQMD's LST methodology. Consistent with the LST methodology guidelines, when quantifying mass emissions for localized analysis, only emissions that occur on site are considered. For the CO and NO<sub>2</sub> LST exposure analysis, receptors who could be exposed for one hour or more are considered. For the PM<sub>10</sub> and PM<sub>2.5</sub> LST exposure analysis, receptors who could be exposed for 24 hours are considered. The nearest receptors that could be exposed for one hour are students, faculty, and staff adjacent to the construction activities. The nearest receptors who could be exposed for 24 hours (e.g., residences) are located approximately 275 meters (902 feet) north of Phases 1A and 1B, ~~and 37 meters (120 feet) from Phase 2~~ construction activities. However, to provide a conservative analysis of potential localized air pollutant exposure, the nearest on-campus uses were analyzed with the shortest distance specified within the LST guidance (SCAQMD 2008) of 25 meters is used for all pollutants. Table 4.2-7 shows the highest maximum localized daily construction emissions for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> for on-site construction activities, which would occur during the grading phase of the Student Center and Central Campus Infrastructure. These construction emissions would not exceed the localized significance thresholds developed by the SCAQMD to determine whether localized air quality impacts would occur at receptor locations proximate to the proposed Project site. Locations located further from these analyzed locations would result in less exposure to air pollutants. As such, no significant localized air quality impacts would occur from Phase 1A- and Phase 1B-related air pollutant emissions attributable to the proposed Project. **This impact would be less than significant with mitigation. Because the projects identified for Phase 2 are only being evaluated on a program-level, pursuant to the Mt. SAC Thresholds of Significance, an air quality impact for this scenario would only occur due to the net trip increase from baseline to buildout and there are no criteria for evaluating program-level impacts related to construction. Therefore, it is assumed that a significant program-level impact would not occur. However, as detailed in Section 2, Introduction, Phase 2 components will be subject to future additional CEQA analyses. In future CEQA analyses, Phase 2 construction emissions will be compared to construction thresholds of significance as a "site-specific project."** Emissions from Phase 2 emissions would be comparable to or less than the emissions generated from overlapping phasing of Phases 1A and 1B, and the receptors would be greater than the 25-meter threshold used in this analysis. Therefore, it can be reasonably assumed that localized emissions would be less than the respective LST thresholds for Phase 2. This impact would be less than significant with mitigation.

5. The commenter provides additional recommended mitigation measures in the event that revisions to the air quality analyses based on the SCAQMD comments would result in a significant air quality impact. As per the responses to SCAQMD comments 1-3 above, no revisions to the EIRs air quality analysis are necessary and air quality impacts would be less than significant with the mitigation measure incorporated within the DEIR. Mt. SAC appreciates the SCAQMD's additional recommended mitigation measures and will consider them for future campus development projects.

In response to this comment, the following text has been added to South Coast Air Quality Management District Rules, on page 4.2-10 of the EIR, following the last paragraph. New text is shown as **bold** and underline.

**SCAQMD Rule 1470, Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines establishes permit requirements for stationary compression ignition engines that are owned or operated in the South Coast Air Quality Management District with a rated brake horsepower greater than 50 (>50 bhp).**

**SCAQMD Rule 1146, Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, including. These rules apply to boilers, steam generators, and process heaters of equal to or greater than 5 million Btu per hour rated heat input capacity used in all industrial, institutional, and commercial operations.**

**SCAQMD Rule 1146.1, Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. This rule applies to boilers, steam generators, and process heaters that are greater than 2 million Btu per hour and less than 5 million Btu per hour rated heat input capacity used in any industrial, institutional, or commercial operation.**

**SCAQMD Rule 1146.2, Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters would apply for operations that involve the use of stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment). This rule applies to units that have a rated heat input starting at 75,000 Btu/hr up to and including 2,000,000 Btu/hr.**

**United Walnut Taxpayers (UWT) Comments**  
**2018 Educational and Facilities Master Plan, Draft Environmental Impact Report (EIR)**

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May 22, 2019

Ms. Mikaela Klein, Sr. Facilities Planner  
Facility Planning & Management  
Mt San Antonio College

**Subject:** United Walnut Taxpayers Comments on the Mt. San Antonio College 2018 Educational and Facilities Master Plan, Draft Environmental Impact Report

Dear Ms. Klein:

The United Walnut Taxpayers (UWT) has had the opportunity to review the Mt. San Antonio College 2018 Educational and Facilities Master Plan, Draft Environmental Impact Report, April 2019, and provides the following comments.

**GENERAL**

- 1) The EIR should be a thorough and detailed report that closely follows CEQA guidelines including the no project/no development scenarios. ] 1
- 2) The medium growth rate alternative proposed in the EFMP is of concern to the Walnut residents and to UWT and should not be considered. UWT proposes putting a cap on campus growth since the current situation is of concern and has created congestion, noise and air quality that is unbearable to residents living immediately adjacent to Mt SAC. ] 2
- 3) Section 1.5, Issues to be Resolved, addresses such issues based on CEQA Section 15123(b)(3) including the choice among alternatives and whether or how to mitigate significant impacts. However, even with these measures many of these impacts remain significant hazards. ] 3
- 4) Section 1.7, Summary of Environmental Impacts from the Project, states, "If Mt SAC, as the lead agency determines that unavoidable significant adverse impacts will result from the proposed 2018 EFMP, Mt SAC must prepare a Statement of Overriding Consideration." This approach has been and will continue to be unacceptable to the Walnut community when avoidance of impacts is a viable option. Section 1.7 goes on to state: "Based on the analysis presented in the Draft EIR, implementation of the proposed 2018 EFMP (Phases 1A, 1B and 2) would result in significant unavoidable impacts related to cultural and transportation/traffic. A Statement of Overriding Considerations would be required for the proposed 2018 EFMP." As noted above, this approach continues to be unacceptable when avoidance of impacts is a viable option. ] 4
- 5) It is UWT's understanding that based on the Memorandum of Agreement between Mt SAC and the City of Walnut signed April 12, 2018, that Mt SAC will meet and confer with the City to "discuss" planning and project(s) implementation and that Mt SAC will submit complete grading and hauling/improvement plans for obtaining required permits. ] 5
- 6) Table 1-1 (Section 4.14), indicates major "improvement" to be done at Temple Avenue and Grand Avenue in three stages. Each of the stages, including present, 2021 and 2027 projects will have significant impacts at the already failing intersection, even after so called mitigation results in impacts that are significant and unavoidable. This again is unacceptable to the UWT and to city residents and should not be accommodated by a Statement of Overriding Concerns. ] 6
- 7) Caltrans supports multimodal transportation solutions such as mass transportation, ride sharing and bicycles in lieu of automobiles. This may benefit an already failing intersection at Temple Avenue and Grand Avenue. ] 7

**United Walnut Taxpayers (UWT) Comments**

**2018 Educational and Facilities Master Plan, Draft Environmental Impact Report (EIR)**

- 8) The EIR is comprehensive but does not adequately address significant issues raised in the report due to the continuous growth of Mt SAC. Adding a cap to the growth of Mt SAC will avoid significant impacts and benefit the quality of life of Walnut residents.

8

**WEST PARCEL**

- 9) Several citations in the Mt. SAC 2018 Educational and Facilities Master Plan, Draft EIR, describe the grading plan of the West Parcel pad development. Among these are Exhibit 3-3, Campus Land Use Plan, Exhibit 3-4, 2018 Facilities Master Plan and Section 4.0 Introduction the Environmental Planning Process. These sections are cited below with accompanying comments in the context of the United Walnut Taxpayers/Mt SAC Mutual Release and Settlement Agreement, requiring that grading plans be withdrawn from the City's grading submittal process.

9

- 10) **Exhibit 3-3, after Page 3.5. Campus Land Use Plan.** Among other land uses, this Exhibit depicts an Agricultural/Sustainable Development zone at the West Parcel which is identical to the finished pad area of the latest West Parcel grading plan submitted by Mt SAC to the City of Walnut on July 2, 2018. EIR Section 1-3. Project Description, states "As shown, the proposed Mt. SAC Land Use Plan anticipates future development in six zones on campus: Primary Educational Zone, Athletics and Support Zone, Agricultural Zone, Wildlife Sanctuary/Open Space Zone, Land Management and Athletics Zone, and agricultural/Sustainable Development Zone. West Parcel development is further described in Section 1.3, Page 1.4, Project Description and Section 4.0, Introduction to Environmental Analysis of this Draft EIR." However, Exhibit, 3-3, Section 1.3 and Section 4.10 do not justify an Agricultural/Sustainable Development zone designation over the finished grading pad, for the following reasons:

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- (a) the Agricultural/Sustainable zone designation is not demonstrated to be a superior land use over current uses which are agricultural and sustainable in nature,
- (b) rationale is not demonstrated for destroying natural rolling hillsides accommodating current cattle grazing versus grading the hillsides to a flat unnatural surface for the same grazing purpose with no future needs identified, and
- (c) grading the hillsides to a flat building pad surface is an incompatible land use and hillside back drop adjoining the Walnut General Plan's "Major Gateway entrance" designation at Grand Avenue and Temple Avenue (WGP, Figure LCD-11: Community Design Plan).

- 11) The West Parcel development Agricultural/Sustainable Development zone pad area outlined in Exhibit 3-3, Campus Land Use Plan and Exhibit 3-4, 2018 Facilities Master Plan coincides identically with the outline of the finished graded pad of the latest Mt SAC grading permit submittal to the City of Walnut on July 8, 2018 (see Page 4, comparing Exhibit 3-3, Exhibit 3-4 and July 8, 2018 Grading Plan). This grading configuration is consistent with the placement of 140,000 cubic yards of earth fill at the West Parcel site and therefore is non-compliant with Section 2.a.i. of the Mutual Release and Settlement Agreement, which states, "Mt. SAC agrees it will not deposit approximately 140,000 cubic yards of earth on the "West Parcel" (as defined below) in connection with construction of the PEP."

11

- 12) Section 2.a.ii. of the Mutual Release and Settlement Agreement further requires that this grading plan be withdrawn stating, "Within three (3) days of the Effective Date, Mt. SAC further agrees it will transmit a fully executed copy of this Settlement Agreement to the City of Walnut and will give

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notice to the City of Walnut that Mt. SAC has formally abandoned the Earthwork and withdraws the grading plans and application to the extent such plans and application relate to the Earthwork.” As of May 20, 2019, the City of Walnut indicates Mt SAC has not “abandoned the Earthwork and withdraws the grading plans.” Mt SAC must withdraw the grading plans and remove the outlined grading pad area representative of 140,000 cubic yards of earth fill from Exhibit 3-3, Campus Land Use Plan and 3-4, 2018 Facilities Master Plan to conform with requirements of the Mutual Release and Settlement Agreement.

12  
cont

13) The Mutual Release and Settlement Agreement, Section 2.a.iv. states “Mt. SAC further agrees that any future earthwork or grading operations at the West Parcel shall require official action of the Board taken at a duly noticed meeting in compliance with all laws; including, but not limited to, CEQA and City of Walnut grading and truck hauling ordinances to the extent applicable.” Should Mt SAC “look for better and more efficient uses once the site is stabilized” (EIR Section 3.4, Page 3.17), Mt SAC must comply with requirements of Sections 2.a.iv. Such “better and more efficient uses” would be consistent with numerous supporting citations of the EIR including Section 4.10-2, Page 4.10.10, Environmental Setting stating, ..... “the southeastern section of campus (approximately 26 acres of hilly terrain) is preserved as a Land Use Management and Grazing Area. The campus areas west of Grand Avenue are undeveloped and include an area preserved as habitat for sensitive plant and animal species (Mt. SAC 2018a).”

13

14) **Section 4.1, Page 4.9, Format of Environmental Analysis.** This section states, “The only difference between the scope of the original West Parcel Solar project and the new West Parcel Site Improvements project is the ultimate use of the pad to be created.” However, this is incorrect since the grading plan configuration depicted in the EIR Exhibit 3-3, Campus Land Use Plan and 3-4, 2018 Facilities Master Plan is identical with the latest “Revised Civil Grading Plans” submitted to the City on July 2, 2018, involving the placement of 140,0000 cubic yards of earth fill at the site which would not occur in a future plan. Most particularly, Section 2.a. i. states, “Mt. SAC agrees it will not deposit approximately 140,000 cubic yards of earth on the “West Parcel” (as defined below) in connection with construction of the PEP”.

14

15) Section 2.a.ii. of the Mutual Release and Settlement Agreement, further states, “Within three (3) days of the Effective Date, Mt. SAC further agrees it will transmit a fully executed copy of this Settlement Agreement to the City of Walnut and will give notice to the City of Walnut that Mt. SAC has formally abandoned the Earthwork and withdraws the grading plans and application to the extent such plans and application relate to the Earthwork.” Therefore, the statement that “The only difference between the scope of the original West Parcel Solar project and the new West Parcel Site Improvements project is the ultimate use of the pad to be created” is invalid and non-compliant with the Mutual Release and Settlement Agreement which abandons and withdraws current grading plans.

15

16) Further, should Mt SAC “look for better and more efficient uses once the site is stabilized” (EIR Section 3.4, Page 3.17), the Mutual Release and Settlement Agreement, Section 2.a.iv. states, “Mt. SAC further agrees that any future earthwork or grading operations at the West Parcel shall require official action of the Board taken at a duly noticed meeting in compliance with all laws; including, but not limited to, CEQA and City of Walnut grading and truck hauling ordinances to the extent applicable.” In such future planning processes, Mt SAC must follow requirements of Sections 2.a.iv. of the Mutual Release and Settlement Agreement.

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United Walnut Taxpayers (UWT) Comments  
2018 Educational and Facilities Master Plan, Draft Environmental Impact Report (EIR)

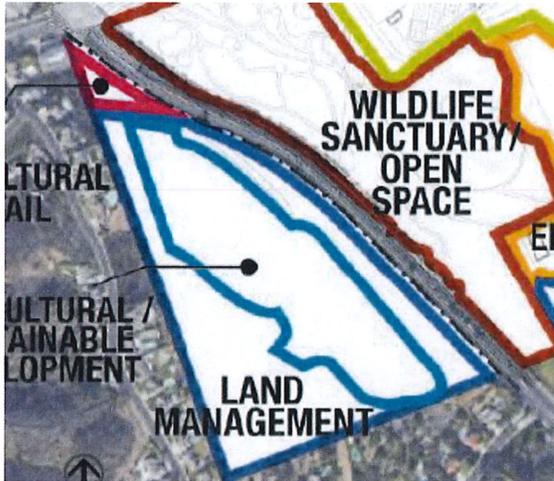
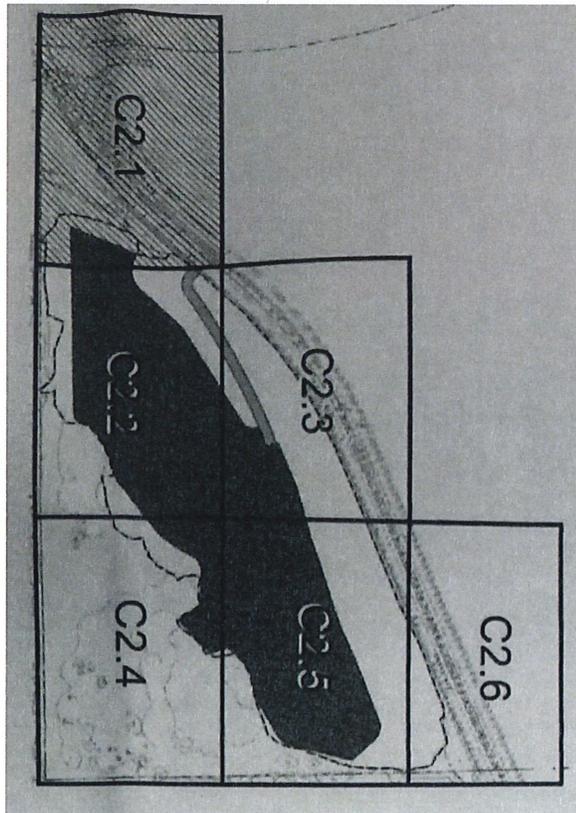


Exhibit 3-3 Campus Plan Use Plan, 2018 EIR



Exhibit 3-4 Facilities Master Plan, 2018 EIR

Key Map, Revised Civil Grading Plans,  
submitted to the City of Walnut, July 8,  
2018



17) **Section 4.10-2, Page 4.10.10, Environmental Setting.** This section states, "In addition, the southeastern section of campus (approximately 26 acres of hilly terrain) is preserved as a Land Use Management and Grazing Area. The campus areas west of Grand Avenue are undeveloped and include an area preserved as habitat for sensitive plant and animal species (Mt. SAC 2018a)." This is inconsistent with Exhibits 3-4 and 3-4 depictions showing structured grading of a substantial portion of the site with road access identical to the most recent grading plans for West Parcel development submitted to the City on July 2, 2018. Whether intended or otherwise, the graphic depictions of Exhibits 3-3 and 3-4 reflect placement of 140,000 cubic yards of imported fill at the West Parcel consistent with the latest grading plans, which is non-compliant with numerous provisions of the Mutual Release and Settlement Agreement, and demonstrates lack of intent to follow through with its provisions.

17

18) **Section 4.1.1., Page 4.11.** This section states, "City of Walnut General Plan, Figure LCD-11: Community Design Plan also shows Grand Avenue as a Landscape Corridor and the portion of Grand Avenue from Temple Avenue to the southern boundary of Snow Creek Park as a Trail Corridor." Section 4.10.1, Page 4.10-6 also states, "City of Walnut General Plan, Figure LCD-11: Community Design Plan also identifies a Major Gateway at the intersection of Grand Avenue and Temple Avenue" .....

18

19) The above EIR citations are consistent with UWT public and written positions and statements throughout the planning process that UWT has monitored from 2014 to the present, emphasizing that Grand Avenue and Temple Avenue/Amar Road is effectively a gateway entry to the City. As such, adjoining hillside areas have been and should continue be maintained in a natural setting consistent with the community hillside environment of the City of Walnut.

19

**FUTURE PLANNING**

20) Certain statements and policy considerations of the EIR are especially relevant should Mt SAC "look for better and more efficient uses once the site is stabilized." UWT believes these considerations are particularly useful in planning for future development at the West Parcel and consistent with the Walnut General Plan, as follows.

20

21) Section 4.10.2 Environmental Setting, Page 4.10.10 reflects responsible appreciation of plant and animal species and their habitats, stating,

21

"In addition, the southeastern section of campus (approximately 26 acres of hilly terrain) is preserved as a Land Use Management and Grazing Area. The campus areas west of Grand Avenue are undeveloped and include an area preserved as habitat for sensitive plant and animal species (Mt. SAC 2018a)."

22) Section 3.4, Page 3.17, Project Background provides useful guidance to any future planning process for the West Parcel, which states,

22

"The proposed 2018 EFMP does not recommend any modifications to the West Parcel site and would, therefore, be consistent with the mutual understanding of Mt. SAC and the City under the MOA." .....and ..... "Mt. SAC also committed to stabilizing the West Parcel site and agreed

to not build the solar project or any similar energy project, but rather look for better and more efficient uses once the site is stabilized.”

22  
cont

- 23) Section 4.1.5, Page 4.10-16, under the heading 2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific, City of Walnut General Plan, reflects an appreciation for the extensive City of Walnut planning processes leading to the recently revised Walnut General Plan, stating:

“The proposed Project does not recommend any improvements to the northeastern and southeastern corners of the intersection of Temple and Grand Avenues, which has a Major Gateway designation; nor are any improvements recommended for the northwestern and southwestern corners of Temple Avenue and the City limits, which has a Minor Gateway designation. Recommended improvements along Temple Avenue include sidewalks, bike lanes, pedestrian bridges, removal of on-street parking, grading and drainage improvements, and new access driveways, which would not conflict with gateway monumentation that may be installed at recommended gateway locations refer to Figure LCD-11: Community Design Plan).”

23

#### PERMITTED USES

- 24) **Table 4.10.1, Page 4.10-8, Permitted, Conditionally Permitted, and Prohibited Uses in Schools and Public Institutional Zones.** Under Table 4.10.1. Permitted uses in Schools and Institutional zones among other items includes, “Other similar types of public facilities and related amenities on publicly owned land. These are not defined and could be any type faculty on publicly owned (Mt SAC lands).” As presented, this an open ended “permitted designation”, which provides no understanding to the public or basis to define the type, scale and composition of development planned. This designation should be removed from the “permitted uses.”

24

- 25) Further, Table 4.10.1 cites “Parking Structures” as permitted uses. The significant scale of the parking structures proposed in the 2018 Facilities Master Plan, the significant traffic considerations resulting from their location and daily use, and their proximity to public streets warrant special consideration and public interaction through the issuance of a Conditional Use Permit from the City of Walnut. This designation should be removed from the “permitted uses.”

25

#### SETBACK DISTANCES

- 26) Residential setback distances from certain Mt SAC facilities have been cited in the 2018 EIR and the Memorandum of Agreement between the City of Walnut and Mt SAC (citations shown below). To comply with provisions of the Memorandum of Agreement, UWT recommends the “Setback from Residential Zone” should be 400 feet. EIR and City/Mt SAC MOA setback designations are cited below:

26

- 27) **Section 4.10-1, Page 4.10-7, Permitted Uses.** Mt SAC has proposed certain designations relevant to the Proposed 2018 EFMP, including the following setback designations:

“Setbacks of 20 feet from public rights-of-way, minimum of 10 feet from any interior property line, 300 feet between residential properties and on-campus parking facilities (including parking garages or transit centers but excluding surface parking lots and public utility services [e.g.,

27

**United Walnut Taxpayers (UWT) Comments**  
**2018 Educational and Facilities Master Plan, Draft Environmental Impact Report (EIR)**

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water pump stations and electrical substations]). Setbacks of 20 feet from public rights-of-way, 25 feet from residential properties, 300 feet between residential properties and on-campus parking facilities (including, but not limited to, parking garages or transit centers but excluding surface parking lots and public utility services [e.g., water pump stations and electrical substations])”

27  
cont.

- 28) **Section 4.10-1, Page 4.10.9 Memorandum of Agreement (MOA) Between the City of Walnut and Mt. SAC.** Consultations between Mt SAC and the City of Walnut have resulted in the following MOA setback designations from single family residential properties.

28

“Any parking structure will maintain a setback of no less than 400 feet from the nearest single-family residential property and Mt. SAC will “meet and confer” with the City to evaluate the potential impacts of the parking project on nearby residents.”

**Letter** United Walnut Taxpayers (UWT)  
May 22, 2019

## **Response to Comment Letter**

### **General**

1. The commenter states the Draft EIR should be a thorough and detailed report that closely follows CEQA guidelines including the no project/no development scenarios. Mt. SAC agrees the 2018 EFMP Draft EIR should be a thorough and detailed report that complies with CEQA and CEQA Guidelines concerning the evaluation of project alternatives, including the “no project/no development” alternative. Section 5.0 of the Draft EIR provides descriptions of each alternative to the project, and Section 5.6.1 evaluates the “No Project/No Development” alternative in accordance with CEQA Guidelines Section 15126.6(e)(3).
2. The commenter states the medium growth rate alternative proposed in the 2018 EFMP is of concern to residents of Walnut and to commenter and should not be considered. Commenter proposes putting a cap on campus growth since current campus enrollment is of concern and commenter states has created congestion, noise, and air quality that is unbearable to residents living immediately adjacent to Mt SAC. The Draft EIR evaluates the medium growth rate alternative in Section 5.6.2 as required under CEQA Guidelines Section 15126.6(a), and Mt. SAC is required to evaluate and consider the medium growth alternative. Mt. SAC notes the medium growth rate alternative was determined to not substantially lessen the environmental impacts of the proposed 2018 EFMP. The commenter’s proposal to put a cap on campus growth is acknowledged for the record and will be forwarded to the Mt. SAC Board of Trustees for review and consideration. Mt. SAC further notes that the commenter has not provided evidence to support the commenter’s argumentative statement that current campus enrollment has created congestion noise and air quality that is “unbearable to residents living immediately adjacent to Mt. SAC.” Section 4 of the Draft EIR contains a discussion of the potential environmental effects of implementing the proposed 2018 EFMP and impacts due to noise (Section 4.11) and air quality (Section 4.2) either do not exist or are reduced to “less than significant” with identified mitigation measures. Section 4.14 contains a discussion that certain traffic impacts are significant and cannot be lessened with mitigation measures. As stated in Section 1.7 of the Draft EIR, if Mt. SAC, as Lead Agency, determines that unavoidable significant adverse impacts will result from the proposed 2018 EFMP, Mt. SAC must prepare a Statement of Overriding Considerations before it can approve the proposed 2018 EFMP. The Statement of Overriding Considerations states that the decision-making body has balanced the benefits of the proposed 2018 EFMP against its unavoidable significant environmental effects and has determined that the benefits of the proposed Project outweigh the adverse effects and, therefore, the adverse effects are considered to be acceptable.
3. The commenter correctly states that Section 1.5 of the Draft EIR, which identifies “Issues to be Resolved,” addresses the requirements in CEQA Section 15123(b)(3), including the choice among alternatives and whether or how to mitigate significant impacts and that “even with these measures many of these impacts remain significant hazards.” As stated in Section 1.7 of the Draft EIR, if Mt. SAC, as Lead Agency, determines that unavoidable significant adverse impacts will result from the proposed 2018 EFMP, Mt.

SAC must prepare a Statement of Overriding Considerations before it can approve the proposed 2018 EFMP, which states that the decision-making body has balanced the benefits of the proposed 2018 EFMP against its unavoidable significant environmental effects and has determined that the benefits of the proposed Project outweigh the adverse effects and, therefore, the adverse effects are considered to be acceptable.

4. The commenter argues the following statement in Section 1.7 of the Draft EIR is “unacceptable to the Walnut community”:

“If Mt SAC, as the lead agency determines that unavoidable significant adverse impacts will result from the proposed 2018 EFMP, Mt SAC must prepare a Statement of Overriding Consideration.” This approach has been and will continue to be unacceptable to the Walnut community when avoidance of impacts is a viable option.”

This comment is argumentative and does not raise a significant environmental issue. As stated in Section 1.7 of the Draft EIR, and consistent with the requirements in CEQA, if Mt. SAC, as Lead Agency, determines that unavoidable significant adverse impacts will result from the proposed 2018 EFMP, Mt. SAC must prepare a Statement of Overriding Considerations before it can approve the proposed 2018 EFMP, which states that the decision-making body has balanced the benefits of the proposed 2018 EFMP against its unavoidable significant environmental effects and has determined that the benefits of the proposed Project outweigh the adverse effects and, therefore, the adverse effects are considered to be acceptable.

5. Commenter states that based on its understanding of the Memorandum of Agreement between Mt SAC and the City of Walnut signed April 12, 2018 (“MOA”), Mt SAC will meet and confer with the City to “discuss” planning and project(s) implementation and that Mt SAC will submit complete grading and hauling/improvement plans for obtaining required permits. This comment does not raise a significant environmental issue. Further, the MOA is identified in the Draft EIR as an “agreement in principle,” and by its express terms is subject to the governing bodies of Mt. SAC and the City of Walnut entering into a formal settlement agreement. Until such time as Mt SAC and the City of Walnut enter into a final settlement agreement, there is no binding settlement agreement between Mt. SAC and the City of Walnut. The commenter is directed to Section V. 6 of the MOA. In addition, Mt. SAC projects, as identified in the proposed 2018 EFMP, are subject to the City of Walnut permit requirements **as applicable** under relevant provisions in the Government Code.
6. The commenter states that Table 1-1 (Section 4.14) indicates major “improvement” to be done at Temple Avenue and Grand Avenue in three stages, with each of the stages, including present, 2021, and 2027 projects, having significant impacts, which even after mitigation results in impacts that are significant and unavoidable. Commenter goes on to state that this is “unacceptable to UWT and to city residents and should not be accommodated by a Statement of Overriding Concerns.” This comment is argumentative and does not identify a significant environmental effect. The Draft EIR in Section 1.17 states the proper use of a Statement of Overriding Consideration under CEQA: “if Mt. SAC, as Lead Agency, determines that unavoidable significant adverse impacts will result from the proposed 2018 EFMP, Mt. SAC must prepare a Statement of Overriding Considerations before it can approve the proposed 2018 EFMP, which states that the decision-making body has balanced the benefits of the proposed 2018 EFMP against its

unavoidable significant environmental effects and has determined that the benefits of the proposed Project outweigh the adverse effects and, therefore, the adverse effects are considered to be acceptable.” The commenter’s disagreement with the use of a Statement of Overriding Considerations is acknowledged for the record and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.

7. The commenter states Caltrans supports multimodal transportation solutions such as mass transportation, ride sharing, and bicycles in lieu of automobiles, which may benefit an already failing intersection at Temple Avenue and Grand Avenue. The comment is noted and does not raise a significant environmental issue. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
8. The commenter states the Draft EIR is comprehensive, but argues it does not adequately address significant issues raised in the Draft EIR due to the continuous growth of Mt SAC, and adding a cap to the growth of Mt SAC will avoid significant impacts and benefit the quality of life of Walnut residents. Mt. SAC appreciates the comment that the Draft EIR is comprehensive, but the statement the Draft EIR does not adequately address significant issues is argumentative. Commenter has not offered any evidence to support the argument. The issue of enrollment cap at Mt. SAC is not an environmental impact issue, but is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.

## **WEST PARCEL**

9. The commenter states the proposed 2018 EFMP and Draft EIR improperly make reference to the grading plan for the West Parcel pad development, and in the context of the United Walnut Taxpayers/Mt SAC Mutual Release and Settlement Agreement (“UWT Settlement Agreement”), such grading plans should be withdrawn from the City’s grading submittal process. This comment does not state a specific concern or question regarding the adequacy of the analysis in the Draft EIR. The Draft EIR identifies the “West Parcel Site Improvements” as a project that is underway under prior CEQA approvals. Section 4.9 of the Draft EIR states “Mt. SAC currently has no other plans for use/development of the West Parcel. Identification of potential future development scenarios for analysis purposes would be speculative. Should Mt. SAC pursue another use for the West Parcel in the future, that project would be subject to environmental review pursuant to CEQA.”
10. Commenter states the Draft EIR Exhibit, 3-3, Section 1.3 and Section 4.10 do not justify an Agricultural/Sustainable Development zone designation over the finished grading pad for the West Parcel because: (a) the Agricultural/Sustainable zone designation is not demonstrated to be a superior land use over current uses which are agricultural and sustainable in nature, (b) a rationale is not demonstrated for destroying natural rolling hillsides accommodating current cattle grazing versus grading the hillsides to a flat unnatural surface for the same grazing purpose with no future needs identified, and (c) grading the hillsides to a flat building pad surface is an incompatible land use and hillside backdrop adjoining the Walnut General Plan’s “Major Gateway entrance” designation at Grand Avenue and Temple Avenue.” This comment assumes the “West Parcel Site Improvements” is a project under the Draft EIR, which is not correct. The West Parcel Site Improvements is a project approved under prior CEQA documents. The commenter is directed to Page 3-18 of the Draft EIR, which states because the “West Parcel Site Improvements have been evaluated in previous project-level environmental documents

pursuant to CEQA, and do not require further approval from the Mt. San Antonio Community College District Board of Trustees, they are not being addressed as part of the recommended projects associated with the proposed 2018 EFMP in this Draft EIR. Rather, they are considered cumulative projects for purposes of analysis in this Draft EIR.”

11. Commenter states the “West Parcel development Agricultural/Sustainable Development zone pad area outlined in Exhibit 3-3 is consistent with the placement of 140,000 cubic yards of earth fill at the West Parcel site and therefore is non-compliant with Section 2.a.i. of the Mutual Release and Settlement Agreement, which states Mt. SAC agrees it will not deposit approximately 140,000 cubic yards of earth on the West Parcel . . . .” The comment is argumentative and does not raise or identify an environmental impact issue, but is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
12. Commenter states Mt. SAC must withdraw the grading plan referenced in the Draft EIR under the terms of the UWT Settlement Agreement. This comment is argument and does not raise any significant environmental issue, but is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
13. Commenter states the UWT Settlement Agreement provides that “Mt. SAC further agrees that any future earthwork or grading operations at the West Parcel shall require official action of the Board taken at a duly noticed meeting in compliance with all laws; including, but not limited to, CEQA and City of Walnut grading and truck hauling ordinances to the extent applicable.” This comment is argumentative and does not raise any significant environmental issue, but is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
14. Commenter quotes provisions in the UWT Settlement Agreement to argue that the following statement in the Draft EIR in Section 4.1, Page 4.9 is incorrect: “The only difference between the scope of the original West Parcel Solar project and the new West Parcel Site Improvements project is the ultimate use of the pad to be created.” Based on this argument, commenter goes on to argue (or imply) Mt. SAC is violating the provisions in the UWT Settlement Agreement that Mt. SAC will not deposit approximately 140,000 cubic yards of earth on the West Parcel. This comment is argumentative and does not raise any significant environmental issue, but is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
15. Commenter argues Mt. SAC is in violation of the provisions of the UWT Settlement Agreement related to abandonment of the “Earthwork” (as defined in the MOA) when Mt. SAC states in Section 4.1, Page 4.9 of the Draft EIR that: “The only difference between the scope of the original West Parcel Solar project and the new West Parcel Site Improvements project is the ultimate use of the pad to be created.” This comment is argument and does not raise any significant environmental issue, but is noted and will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
16. Commenter’s citation of the UWT Settlement Agreement concerning Mt. SAC’s obligation to comply with CEQA in the event of any future earthwork or grading project at the West Parcel is noted. The comment does not raise any significant environmental issue or challenge the environmental analysis in the Draft EIR. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.

17. Commenter states Section 4.10-2, Page 4.10.10 of the Draft EIR is inconsistent with Exhibits 3-4 and 3-4 depictions because such exhibits (intended or otherwise) reflect placement of 140,000 cubic yards of imported fill at the West Parcel consistent with the latest grading plans, and is non-compliant with numerous provisions of the UWT Settlement Agreement and “demonstrates lack of intent to follow through with its provisions.” The comment is argumentative and does not raise a significant environmental issue.
18. Commenter states the Draft EIR makes reference to the “City of Walnut General Plan, Figure LCD-11.” The comment is noted, but does not raise any significant environmental issue. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
19. Commenter states Grand Avenue and Temple Avenue/Amar Road is effectively a gateway entry to the City, and as such, adjoining hillside areas have been and should continue be maintained in a natural setting consistent with the community hillside environment of the City of Walnut. The comment is noted, but does not raise any significant environmental issue. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.

## **FUTURE PLANNING**

20. Commenter states that certain policy statements in the Draft EIR and Walnut General Plan are useful in directing Mt SAC to “look for better and more efficient uses [of the West Parcel] once the site is stabilized.” These comments are noted, but do not raise any significant environmental issue. The comments will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
21. Commenter states Section 4.10.10 of the Draft EIR reflects responsible appreciation of plant and animal species and their habitats. Mt. SAC acknowledges the comment.
22. Commenter states Section 3.4, Page 3-17 of the Draft EIR provides useful guidance to any future planning process for the West Parcel. Mt. SAC acknowledges the comment.
23. Commenter states Section 4.1.5, Page 4.10-16, reflects an appreciation for the extensive City of Walnut planning processes leading to the recently revised Walnut General Plan. Mt. SAC acknowledges the comment.

## **PERMITTED USES**

24. Commenter states that under Table 4.10.1 permitted uses in Schools and Public Institutional Zones is an open-ended “permitted designation”, which provides no understanding to the public or basis to define the type, scale, and composition of development planned is noted. The comment does not raise any significant environmental issue, but will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
25. Commenter states that “Parking Structures” as described in Table 4.10.1 of the Draft EIR should be removed as “permitted uses” in the proposed 2018 EFMP because of significant traffic concerns. The comment is noted, but does not raise any significant environmental issue. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.

## SETBACK DISTANCES

26. Commenter states that the residential setback distances for certain Mt SAC facilities described in the proposed 2018 EFMP Draft EIR should “comply with provisions of the Memorandum of Agreement, [and commenter] recommends the ‘Setback from Residential Zone’ should be 400 feet”. The comment is noted; however the comment is argumentative and does not raise a significant environmental issue. Further, the MOA is an “agreement in principle,” and by its express terms is subject to the governing bodies of Mt. SAC and the City of Walnut entering into a formal settlement agreement, and until such time as Mt. SAC and the City of Walnut enter into a formal settlement agreement, there is no binding settlement agreement between Mt. SAC and the City of Walnut. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
  
27. Commenter states that the setback designations in Section 4.10.1, Page 4.10-7 of the Draft EIR are subject to the setback provisions in the MOA. The comment is noted, but does not raise a significant environmental issue. Further, the MOA is an “agreement in principle,” and by its express terms is subject to the governing bodies of Mt. SAC and the City of Walnut entering into a formal settlement agreement, and until such time as Mt. SAC and the City of Walnut enter into a formal settlement agreement, there is no binding settlement agreement between Mt. SAC and the City of Walnut. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.
  
28. Commenter states that the setback designations in Section 4.10.1, Page 4.10-9 of the Draft EIR are subject to the setback provisions in the MOA. The comment is noted, but does not raise a significant environmental issue. Further, the MOA is an “agreement in principle,” and by its express terms is subject to the governing bodies of Mt. SAC and the City of Walnut entering into a formal settlement agreement, and until such time as Mt. SAC and the City of Walnut enter into a formal settlement agreement, there is no binding settlement agreement between Mt. SAC and the City of Walnut. The comment will be forwarded to the Mt. SAC Board of Trustees for review and consideration.