



FINAL Environmental Impact Report

General Plan Update and West Valley Specific Plan
SCH No. 2017101010

City of Walnut

May 2018

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1. INTRODUCTION

The Final Environmental Impact Report (FEIR) for the proposed City of Walnut General Plan Update (GPU) and West Valley Specific Plan (WVSP) has been prepared by the City of Walnut (City), the Lead Agency, in keeping with the California Environmental Quality Act (CEQA). The City has prepared the FEIR pursuant to the CEQA Guidelines, including Sections 15086 (Consultation Concerning Draft EIR), 15088 (Evaluation of and Responses to Comments), and 15132 (Contents of Final Environmental Impact Report). In conformance with these guidelines, the Final EIR consists of the following volumes:

1. The Draft EIR (DEIR) which was circulated for a 45-day public comment period beginning February 16, 2018 and ending on April 2, 2018; and
2. The FEIR document, which includes a list of all commenters on the DEIR during the public comment period, copies of all written comment letters on the DEIR, responses to all comments received on the DEIR, and required revisions to the DEIR in response to comments.

None of the revisions to the DEIR represent a substantial increase in the severity of an identified significant impact or the identification of a new significant impact, mitigation measure, or alternative different from those already considered in preparing the DEIR.

The DEIR, FEIR, and administrative record for the GPU and WVSP are available for review upon request at:

City of Walnut
Community Development Department
21201 La Puente Road
Walnut, California 91789

Certification of this Final EIR by the Walnut City Council must occur prior to approval of the GPU and WVSP.

1.1 PROJECT DESCRIPTION SUMMARY

This project description summary should not be relied upon for a thorough understanding of the details of the project, its individual impacts, and related mitigation needs. Please refer to Chapter 3 of the DEIR for a complete description of the project, Chapters 4 through 20 and 22 of the DEIR for a complete description of identified environmental impacts and associated mitigation measures, and Chapter 21 of the DEIR for an evaluation of alternatives to the project.

The General Plan Update (GPU) is a long-range planning program that guides the orderly growth and development of the Planning Area, which is defined to be all properties within the City's corporate limits and properties within its sphere of influence. The GPU guides the City's vision of its future and establishes a policy framework to govern decision-making concerning the physical development of the community, including assurances that the community at large will be supported by an adequate range of public services and infrastructure systems. The West Valley Specific Plan (WVSP) is a policy document that guides the proposed transition and development of the West Valley Mixed Used area, which transverses Valley Boulevard between

the western City limit and Lemon Creek Waterway. Currently, the area has several low-rise commercial operations, including numerous auto service shops. The proposed mixed-use area will include a mix of uses with parks and open space, along with low scale commercial, retail, and new housing opportunities. The GPU, analyzed in this EIR, has been tailored to address revised land use policy direction(s) for defined “focus areas,” to update maps and policies to reflect current State Law, and to reflect the current vision regarding circulation and mobility improvements within the City. The WVSP was developed to be consistent with the GPU.

Neither the GPU or the WVSP authorize any specific development project, other form of land use approval of any kind, public facilities, or capital facilities expenditures or improvements to be developed. As such, this EIR is a Program EIR and is the appropriate type of document to identify the geographic extent of sensitive resources and hazards, along with existing and planned services and infrastructure support systems that occur in the Planning Area. Further, a Program EIR is described in Section 15168 of the CEQA Guidelines as the appropriate analytical framework to assess the cumulative environmental effects of the full plan in a first-tier level of analysis, to identify broad concerns and sets of impacts, and to define/develop regulatory standards and programmatic procedures that reduce impacts and help achieve environmental goals and objectives.

Later activities proposed pursuant to the goals and policies of the GPU and WVSP will be reviewed in light of this EIR and may focus on those site-specific and localized environmental issues that could not be examined in sufficient detail as part of this EIR. As with all projects proposed in the City, projects contained in specific Focus Areas where land use changes are proposed will be subject to comprehensive environmental review at such time the City receives a permit/entitlement application for the project(s).

The advantages of a Program EIR include consideration of effects and alternatives that cannot practically be reviewed at the project-level, consideration of cumulative impacts that may not be apparent on a project-by-project basis, the ability to enact Citywide Mitigation Measures, and subsequent reduction in paperwork.

1.2 ADEQUACY OF FINAL EIR

Under CEQA, the responses to comments on a Draft EIR must include good faith, well-reasoned responses to all comments received on the Draft EIR that raise significant environmental issues related to the project under review. If a comment does not relate to the Draft EIR or does not raise a significant environmental issue related to the project, there is no need for a response under CEQA.

In responding to comments, CEQA does not require the EIR authors to conduct every test or perform all research or study suggested by commenters. Rather, the EIR authors need only respond to significant environmental issues and need not provide all of the information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Sections 15088, 15132, and 15204).

Due to the number of comments received during the public comment period of the DEIR which discuss proposed or recommended General Plan policies or alternative land use designations and allowable uses, the City will address these policy-related comments in the staff report for consideration by the City Council for adoption of the General Plan Update.

List of Acronyms, Abbreviations, and Symbols	
Acronym/ Abbreviation	Full Phrase or Description
CEQA	California Environmental Quality Act
DEIR	Draft Environmental Impact Report
FEIR	Final Environmental Impact Report
GPU	General Plan Update
WVSP	West Valley Specific Plan

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2. RESPONSE TO COMMENTS ON THE DRAFT EIR

After completion of the DEIR, the Lead Agency is required under CEQA Guidelines Section 15086 (Consultation Concerning Draft EIR) and 15088 (Evaluation of and Response to Comments) to consult with and obtain comments from other public agencies having jurisdiction by law with respect to the project, and to provide the general public with an opportunity to comment on the DEIR. Under CEQA Guidelines Section 15088, the Lead Agency is also required to respond in writing to substantive environmental points raised in the DEIR review and consultation process.

Comments on the DEIR were submitted in the form of comment letters during the public comment period held between February 16, 2018 and April 2, 2018. CEQA Guidelines Section 15132 (Contents of Final Environmental Impact Report), subsection (b), requires that the FEIR include the full set of comments and recommendations received on the DEIR either verbatim or in summary. Section 15132, subsection (c) requires that the FEIR include “a list of persons, organizations, and public agencies commenting on the DEIR,” and Section 15132, subsection (d), requires that the FEIR include “the responses of the Lead Agency to significant environmental points raised in the review and consultation process.” In keeping with these guidelines, this Response to Comments chapter includes the following sections:

- A list of commenters on the DEIR which lists each individual who submitted comments during the public comment period;
- A response to all comments received on the DEIR which includes copies of all letters and emails received during the public comment period.

2.1 LIST OF COMMENTERS

Agencies and individuals and organizations who commented on the DEIR are listed below in alphabetical order. As stated in Chapter 1.0 of this FEIR, several individuals commented on the proposed policies, land use designations, and allowable uses proposed in the GPU and WVSP. Comments received by these individuals are not related to the DEIR, and therefore, will be addressed in the staff report for consideration by the City Council during the hearing to adopt the GPU and WVSP.

Each comment letter is included below and assigned a code (e.g., L1, L2, L3 etc.). Each comment within each letter is further assigned a code for tracking individual responses to comments (e.g., L1.1, L1.2, L2.1, L2.2 etc.).

2.1.1 Responsible and Interested Agencies

County of Los Angeles Fire Department (L1)
County Sanitation Districts of Los Angeles County (L2)
Golden State Water Company (L3)
Native American Heritage Commission (NAHC) (L4)

2.1.2 Individuals and Organizations

Mt. San Antonio College (Mt. SAC) (L5)

2.2 RESPONSES TO COMMENTS

The following section includes comment letters received during the public comment period on the DEIR, followed by a written response to each comment. The comments and responses are correlated by code numbers shown in the right margin of each comment letter.



**COUNTY OF LOS ANGELES
FIRE DEPARTMENT**

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

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JANICE HAHN
FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

March 27, 2018

L1

Tom Weiner, Director
City of Walnut
Community Development Department
21201 La Puente Boulevard
Walnut, CA 91789

Dear Mr. Weiner:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "WEST VALLEY SPECIFIC PLAN," INCLUDES THE FOLLOWING ELEMENTS: LAND USE AND COMMUNITY DESIGN; CIRCULATION; CONSERVATION, OPEN SPACE, AND RECREATION; COMMUNITY FACILITIES AND INFRASTRUCTURE; SAFETY; AND NOISE ELEMENTS, WALNUT, FFER 201800029

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:

We have the following comments pertaining to Section 18, Public Services and Recreation, 18.1 Environmental Setting, (a) Fire Protection and Emergency Medical Services:

Paragraph one, sentence one, should be corrected to state, "The City of Walnut is in the Consolidated Fire Protection District of Los Angeles County (Fire District) commonly known as the Los Angeles County Fire Department and receives its fire and emergency medical services from the Fire District." L1.1

Under Station 61, sentences two and three should be revised to state, "This station is staffed with a 2-person paramedic squad and a 3-person engine company that responds to all L1.2

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

- | | | | | | | |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | EL MONTE | INDUSTRY | LAWNDALE | PARAMOUNT | SIGNAL HILL |
| ARTESIA | CARSON | GARDENA | INGLEWOOD | LOMITA | PICO RIVERA | SOUTH EL MONTE |
| AZUSA | CERRITOS | GLENDORA | IRWINDALE | LYNWOOD | POMONA | SOUTH GATE |
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| BELL | COMMERCE | HAWTHORNE | LA HABRA | MAYWOOD | ROLLING HILLS | WALNUT |
| BELL GARDENS | COVINA | HERMOSA BEACH | LA MIRADA | NORWALK | ROLLING HILLS ESTATES | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HIDDEN HILLS | LA PUENTE | PALMDALE | ROSEMEAD | WESTLAKE VILLAGE |
| BRADBURY | DIAMOND BAR | HUNTINGTON PARK | LAKEWOOD | PALOS VERDES ESTATES | SAN DIMAS | WHITTIER |
| | DUARTE | | LANCASTER | | SANTA CLARITA | |

emergencies, including accidents, fires, swift water rescues, and hazardous material spills. Its primary jurisdiction covers parts of the cities of Walnut, Industry, and Diamond Bar as well as surrounding unincorporated areas.”

Under Station 146, sentences two and three should be revised to state, “This station’s primary jurisdiction covers a part of the City of Walnut, including Mt. San Antonio College, and some unincorporated area. This station is known as a critical station meaning that if the engine company is on an incident lasting longer than 30 minutes, the Fire District will respond a move-up engine to temporarily cover Station 146’s jurisdiction. This station is staffed with a 3-person engine company.” L1.3

Additionally, in regards to the reference to mutual aid, there appears to be some confusion regarding mutual aid. Most cities in California are part of the master mutual aid program, which is meant to be invoked only in the rarer, large-scale and unusual circumstances. Alternatively, automatic aid is routine aid provided to specific pre-agreed areas. The Fire District does have an automatic aid agreement with the City of West Covina but the reference to the City of Diamond Bar should be deleted since Diamond Bar is in the Fire District, so the Fire District is its Fire/EMS public safety agency. L1.4

The last paragraph under (a) Fire Protection and Emergency Medical Services should be deleted. The Fire District has not adopted the NFPA’s 90-percentile response times due in part to the diversity of our jurisdiction. L1.5

LAND DEVELOPMENT UNIT:

The Land Development Unit is reviewing the proposed “WEST VALLEY SPECIFIC PLAN” project for access and water system requirements. The Land Development Unit’s 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. L1.6

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. 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.

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.

PARKING ON PUBLIC FIRE APPARATUS ACCESS ROADS:

1. Provide a minimum width of 34 feet for parallel parking on one side of the Fire Apparatus Access Road with through access and with one side of the roadway being designated "No Parking – Fire Lane."

2. Provide a minimum width of 34 feet for parallel parking on both sides of the Fire Apparatus Access Road when the street is designed to be a cul-de-sac less than 700 feet in-length.
3. Provide a minimum width of 36 feet for parallel parking on both sides of the Fire Apparatus Access Road and/ or on cul-de-sac design with a length of 701 feet to 1,000 feet.

WATER SYSTEM REQUIRMENTS:

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 County of Los Angeles Fire Department Regulation 8.
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 system, 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 during the Building Plan Check.

For any questions regarding the report, please contact Inspector Claudia Soiza at (323) 890-4243 or 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 or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

The County of Los Angeles Fire Department's Forestry Division has no objection to the proposed project.

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.

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

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
FORESTRY DIVISION
5823 RICKENBACKER ROAD, ROOM #123
COMMERCE, CA 90040-4335



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BY: _____

Tom Weiner, Director
City of Walnut
Community Development Department
21201 La Puente Boulevard
Walnut, CA 91789

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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

April 2, 2018

L2

Ref. Doc. No.: 4464744

Mr. Tom Weiner
Community Development Director
City of Walnut
21201 La Puente Road
Walnut, CA 91789-2018

Dear Mr. Weiner:

DEIR Response for the Walnut General Plan Update and West Valley Specific Plan

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on February 20, 2018. The proposed project is located within the jurisdictional boundaries of Districts Nos. 21 and 22. Previous comments submitted by the Districts in correspondence dated November 6, 2017 (copy enclosed) still apply to the subject project with the following comments:

1. Table 1-1 Summary of Scoping Comments, *Page 1-6*, County Sanitation Districts of Los Angeles County's Summary of Comment – The wastewater generated by the City of Walnut (City) is treated at one or more of the following: 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 64.06 million gallons per day (mgd); the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 256 mgd; and/or the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 20.8 mgd. **L2.1**
2. Utilities and Service Systems, *Page 20-6*, (b) Wastewater Collection and Treatment second paragraph – As indicated in item no. 1. of this letter, Treatment of wastewater from the City occurs at the San Jose Creek WRP, the JWPCP, and the Los Coyotes WRP. **L2.2**
3. 22.1.14 Utilities and Service Systems, *Page 22-5*, first paragraph – The information mentions that calculations indicated that there would be suitable capacity within existing systems to service the growth anticipated under the subject plan. Please note that availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other **L2.3**

proposed developments in the area, the availability of trunk sewer capacity should be verified as the project advances.

4. All other information concerning Districts' facilities and sewerage service contained in the document is current.

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



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

November 6, 2017

Ref. Doc. No.: 4307644

Mr. Tom Weiner
Community Development Director
City of Walnut
21201 La Puente Road
Walnut, CA 91789

Dear Mr. Weiner:

NOP Response for the Walnut General Plan Update and West Valley Specific Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the subject project on October 5, 2017. The City of Walnut (City) is located within the jurisdictional boundaries of Districts Nos. 21 and 22. We offer the following comments regarding sewerage service:

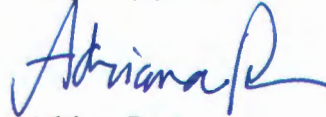
1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. 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 million gallons per day (mgd) and currently processes an average flow of 64.6 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.
3. In order to estimate the volume of wastewater a project will generate, go to 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 for a copy of the Districts' average wastewater generation factors.
4. 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 proposed projects within the City. 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, 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.

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



February 21, 2018

Mr. Tom Weiner
Community Development Director
City of Walnut
21201 La Puente Rd.
P.O. Box 682
Walnut, CA 91789

SUBJECT: Notice of Availability of the Draft General Plan and West Valley Specific Plan and Draft Environmental Impact Report for the City of Walnut General Plan Update and West Valley Specific Plan


Dear Mr. Weiner:

Thank you for allowing Golden State Water Company (GSWC) the opportunity to review and comment with regards to the above subject project.

The only comment GSWC has is within the Draft Environmental Impact Report Volume I of II, General Plan Update and West Valley Specific Plan, SCH No. 2017101010, City of Walnut, dated February 2018. Within this report there are two paragraphs, under Section 20. Utilities and Service Systems, Subsection 20.1.1 Environmental Setting, heading Golden State Water Company – San Dimas System Service Area, that describes GSWC’s service area and water sources. The first sentence of the first paragraph states, “Golden State Water Company (GSWC) provides water services to the northeastern section of the City in or around open spaces adjacent to Buzzard Peak, just above Mt. San Antonio College (MSAC).” Please revise this sentence as, “Golden State Water Company (GSWC) provides water services to the northeastern section of the City in or around open spaces adjacent to Buzzard Peak, just above Mt. San Antonio College (MSAC), via an interconnection with Walnut Valley Water District.” Also, within the second paragraph you should add Walnut Valley Water District as a source of water supply for the San Dimas System.

L3.1

Regards,



Kyle Snay
Golden State Water Company
Operations Engineer
(909) 592-4271, Est. 1403
kylesnay@gswater.com

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NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
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March 22, 2018

L4

Tom Weiner, Director
City of Walnut
21201 La Puente Road
Walnut, CA 91789

Sent via e-mail: jcarlson@cityofwalnut.org
Cc: jguerra@cityofwalnut.org

Re: SCH# 2017101010, City of Walnut General Plan Update and West Valley Specific Plan Project, City of Walnut; Los Angeles County, California

Dear Mr. Weiner:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Executive Summary; the Introduction and Project Description; the Environmental Impact Analysis, section 9 Cultural Resources and Tribal Cultural Resources; prepared by the City of Walnut. We have the following concerns:

1. There is no documentation that **government-to-government consultation by the lead agency** was conducted for this project under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes. Discussions under AB-52 may include the type of document prepared; avoidance, minimization of damage to resources; and proposed mitigation. Contact by consultants during the Cultural Resources Assessments is not formal consultation. **L4.1**

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3714 if you have any questions.

Sincerely,

Handwritten signature of Gayle Totton in cursive.

Gayle Totton, B.S., M.A., Ph.D.
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

ADDITIONAL INFORMATION:

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for “tribal cultural resources”⁵, that now includes “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.”⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled “Tribal Consultation Under AB 52: Requirements and Best Practices”.

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.¹¹

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project’s impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

¹⁸ Pub. Resources Code § 21082.3 (d)

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

- Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subs. (d) and (e)) address the processes to be

²² (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

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L5

Tom Weiner, Director of Community Development
City of Walnut
21201 La Puente Road
P.O. Box 682
Walnut, CA 91789

April 12, 2018

RE: Comments on the City of Walnut's Draft General Plan Update and Draft General Plan EIR

Dear Mr. Weiner,

Thank you for granting Mt. San Antonio College ("Mt. SAC") an extension of time to review and comment on the above-referenced documents. As articulated in the City's documents, we appreciate the City's continued support of our educational programs and look forward to greater coordination between our entities moving forward. In that spirit, we provide the following comments to the City's Draft General Plan Update and Draft General Plan EIR.

I. Draft General Plan Update

Misclassification of the West Parcel

L5.1

The triangular piece of land located west of Grand Avenue, south of the Temple/Amar intersection, and south of the "Christmas tree lot" is owned by Mt. SAC and known as the "West Parcel" property. The West Parcel is incorrectly classified in the following Figures:

- In Figure LCD-8: Land Use Plan, the West Parcel should be designated "Schools and Public Institutional" like the rest of Mt. SAC property. (p. LCD-17);
- In Figure LCD-11: Community Design Plan, the West Parcel should be designated "Schools and Institutions" like the rest of Mt. SAC property. (p. LCD-33);
- In Figure C-8: Trails Plan, the West Parcel should be designated "Public Institutional" like the rest of Mt. SAC property. (p. C-15);
- In Figure COR-1: Open Spaces and Natural Resources, the West Parcel should be designated "Public Institutional" like the rest of Mt. SAC property. (p. COR-7);
- In Figure COR-3: Parks and Recreation, the West Parcel should be designated "Mt. San Antonio College" like the rest of Mt. SAC property. (p. COR-17);

BOARD OF TRUSTEES

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- In Figure COR-4: Trails Plan, the West Parcel should be designated “Public Institutional” like the rest of Mt. SAC property. (p. COR-21); and
- In Figure CFI-3: Schools, the West Parcel should be designated “Mt. SAC” like the rest of Mt. SAC property. (p. CFI-13).

Inconsistency between General Plan and City Zoning Ordinances

L5.2

As you know, the law requires city zoning ordinances to be consistent with a city’s general plan. Gov. Code § 65860(a). As a result, once the General Plan has been updated, Mt. SAC requests that the City’s zoning ordinances and that the map reflecting those zones¹ is updated to show that Mt. SAC, including the West Parcel, is zoned Schools and Public Institutional.

Incorrect Acreage Shown for Mt. SAC

L5.3

Including the West Parcel, Mt. SAC property spans more than 420 acres. In two places, the General Plan Update incorrectly shows that Mt. SAC is 391 acres and should be revised to show that Mt. SAC spans 420 acres. (See p. LCD-10; Table LCD-1: Existing Land Use Distribution (2017) at p. LCD-11).

Wildlife Sanctuary

In Figure COR-2: Historically and Culturally Significant Sites, please revise “Wildlife Sanctuary” in the legend to read “Mt. SAC Wildlife Sanctuary” to reflect that the wildlife sanctuary is on Mt. SAC property. (p. COR-11).

L5.4

Projects Requiring Further Coordination between Mt. SAC and the City

L5.5

Mt. SAC supports the following projects, but requests that the City engages in further coordination with Mt. SAC, as these projects directly involve Mt. SAC or have the potential to impact the college:

- An active transportation network “linking Mt. San Antonio College to a variety of travel modes, particularly bike and pedestrian trails.” (p. C-9);
- The proposed/planned trail along the west side of Temple Avenue, adjacent to the West Parcel, which appears to be a continuation of the existing City Trail along Temple Avenue. (Figure C-8: Trails Plan, p. C-15); and

¹ The current City of Walnut Zoning Map (<http://www.cityofwalnut.org/home/showdocument?id=2812>) incorrectly shows that Mt. SAC is a Residential Planned Development zone with a Civic Center overlay.

- Public art – working with the City of Walnut, the community, and “local artists to design and implement artistic and cultural features throughout the City and on public properties.” (p. COR-26).

II. Draft General Plan EIR

Misclassification of the West Parcel

L5.6

In Figure 14.2: Draft Land Use Plan, the West Parcel should be designated “Schools and Public Institutional” like the rest of Mt. SAC property. (p. 14-11).

In Appendix A: Notice of Preparation, Exhibit 3: Draft Land Use Plan, the West Parcel should be designated “Schools and Public Institutional” like the rest of Mt. SAC property. (p. 6).

Incorrect Acreage Shown for Mt. SAC

L5.7

Table 3-2: Existing Land Distribution (2017) (p. 3-10) and Table 14-1: Existing Land Use Distribution (2017) (p. 14-3) show incorrect acreage for Mt. SAC. Both tables should be revised to show that Mt. SAC consists of 420 acres.

Mt. SAC Student Population

L5.8

Under Section 18.1.1 Environmental Setting, subsection (c) Schools, the Draft General Plan EIR states that, “Mt. SAC is a two-year community college and has a student population of 34,591 as of the Spring of 2017 (fn1); this ranks the college as one of the ten largest enrollments of any public higher education institution in California.” (p. 18-2).

Mt. SAC would like to clarify that the number 34,591 represents “Student Headcount.” Student Headcount refers to the number of distinct individuals who have enrolled in any Mt. SAC course or program during the specific timeframe of the census, which in this case was the spring 2017 term. Student Headcount does not represent the number of students on the Mt. SAC campus at any given time. Moreover, the number 34,591, which represents Student Headcount for spring 2017, is incorrectly shown as the number of Mt. SAC students enrolled from 2014-15. (Table 18-1: Schools and Enrollment in Walnut, p. 18-5).

In Section 17.2.3, Environmental Impacts, in addition to considering the SCAG’s projected growth for the City, Mt. SAC suggests that the City also considers Mt. SAC’s projected growth when looking at environmental impacts. (p. 17-4). The same comment applies to Section 18.2.3, Environmental Impacts. (p. 18-9 to 18-10).

Mt. SAC's Growth Forecast Impacts the Traffic Analysis

L5.9

It is important to note that Mt. SAC does not use Student Headcount (see above) to measure growth; it uses Weekly Student Contact Hours² ("WSCH") and Full-Time Equivalent Students³ ("FTES"). The College projects that its annual growth rate in terms WSCH and FTES will be 0.75% per year and therefore 8.6% over the next ten years.⁴ Mt. SAC's enrollment growth forecast for Full-Time Equivalent Students and Weekly Student Contact Hours is an important factor that should be considered by the City when conducting its traffic analysis. (See 2018 EFMP, Data Set 52: Enrollment Growth Forecast, p. 2.69).

The following sections of the Traffic Impact Analysis should be revised to include consideration of Mt. SAC's growth enrollment forecast:

- The Year 2040 buildout assumes 56,921 community college students. (Appendix E: Traffic Impact Analyses, p. i). It is not clear how the City arrived at this number or whether it reflects projected Student Headcount, Weekly Student Contact Hours, or Full-Time Equivalent Students. Mt. SAC requests that the City works with Mt. SAC to validate the projected number of community college students.
- The Land Use Summary considers residential, commercial, retail, office, parks/recreational and K-12 land uses, but not Mt. SAC's use. (Appendix E: Traffic Impact Analyses, p. 23). Mt. SAC requests that the City also considers the college's enrollment growth forecast.
- Based on the existing and future number of community college students shown in Table 4: Land Use Summary by Traffic Analysis Zone, the City assumes a yearly growth rate of 2.0% for community college students. (Appendix E: Traffic Impact Analyses, p. 25). However, Mt. SAC projects a yearly growth rate of 0.75% (mid-range projection) or 1.22% (high-end projection)⁵ and suggests that the City uses our numbers. Additionally, all community college student growth is shown in TAZ 3, while none is shown in TAZ 7 (which includes Mt. SAC property south of Temple Avenue). *Id.* Mt. SAC suggests allocating growth between TAZ 3 and TAZ 7 as shown in the EFMP's enrollment growth forecast⁶. *Id.*

Other Traffic Analysis Issues

L5.10

Table 5: Project Trip Generation Rates relies on the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012. (Appendix E: Traffic Impact Analyses, p. 26, fn. 2). The 10th Edition Trip Generation Manual was published in 2017 and includes significantly different

² "Weekly Student Contact Hours" refers to the total hours per week a student attends a particular class. See also 5 CCR § 58003.1(f).

³ A "Full-Time Equivalent Student" is one who is enrolled in 12 or more units.

⁴ 2018 Educational and Facilities Master Plan ("EFMP"), http://www.mtsac.edu/efmp/documents_to_review.html (p. 2.68).

⁵ EFMP, p. 2.68; see also Parking and Circulation Master Plan ("PCMP"), forthcoming Appendix to EFMP.

⁶ EFMP, p. 2.69.

trip generation rates for many of the listed uses, both in peak hour and daily. Mt. SAC notes that total trip generation shown in Table 5 would likely be lower if the updated 10th Edition trip generation rates had been used.

Regarding Table 6: Net Project Trips Generated, Mt. SAC notes that based on the listed net changes for each land use (Table 4, p. 25) and the listed trip generation rates (Table 5, p. 26), it calculates notably different "Trips Generated" numbers from those shown in Table 6, particularly for the Evening Peak Hours. (Appendix E: Traffic Impact Analyses, pp. 27-30). L5.11

Figure D-8: TAZ 3 Trip Distribution (Educational) shows that 36% of college traffic will access Mt. SAC via Mountaineer Road, whereas our PCMP⁷ shows that only 25% of college traffic will use Mountaineer Road. (Appendix E: Traffic Impact Analyses, Apx-81).

Regarding mitigation in the intersections identified on pages 2-12 to 2-13, Mt. SAC requests that the City coordinates with the college to confirm that our analyses are consistent. (pp. 2-12 to 2-13). L5.12

Improper References to "Mount San Antonio College"

In some cases, the City's documents incorrectly refer to the college as "Mount San Antonio College." (e.g. Draft General Plan EIR at 2-16; 2-17, 3-17; 9-16; Draft General Plan Update at I-6; LCD-5; N-6). Mt. SAC requests that the City revises its documents to make proper references to the college, which include "Mt. SAC," "MT. SAC," and "Mt. San Antonio College." For further information, please refer to the Mt. SAC style guide.⁸ L5.13

Sincerely,



Gary Nellesen
Director, Facilities Planning & Management

CC: Bill Scroggins, President
Mike Gregoryk, Vice President, Administrative Services
Board of Trustees
Sean Absher, Legal Counsel

⁷ See PCMP, forthcoming Appendix to EFMP.

⁸ Mt. SAC style guide: http://www.mtsac.edu/marketing/resources/LogoStyle_Guide.pdf

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2.2.1 County of Los Angeles Fire Department (L1) (7 pages)

L1.1 Fire Department name should be corrected in Chapter 18, Environmental Setting.

Response: Text has been revised as directed.

L1.2 Fire Department staffing should be corrected in Chapter 18, Environmental Setting.

Response: Text has been revised as directed.

L1.3 Fire Station jurisdiction and response time should be revised in Chapter 18, Environmental Setting.

Response: Text has been revised as directed.

L1.4 Information regarding mutual aid should be corrected in Chapter 18, Environmental Setting.

Response: Text has been revised as directed.

L1.5 Statement regarding NFPA's 90th-percentile response times should be deleted in Chapter 18, Environmental Setting.

Response: Text has been revised as directed.

L1.6 Project-specific requirements are provided for buildout of the West Valley Specific Plan.

Response: Comment noted. Neither the GPU nor the WVSP authorize a specific development project. Buildout of the West Valley Specific Plan as well as the General Plan Update will be subject to all applicable land use entitlement and building permit application processes whereby individual projects will be required to comply with these measures.

2.2.2 County Sanitation Districts of Los Angeles County (L2) (4 pages)

L2.1 Correct the wastewater treatment facilities and their capacities serving the City of Walnut in Chapter 1, under Scoping Comments.

Response: Text has been revised as directed.

L2.2 Correct the wastewater treatment facilities and their capacities serving the City of Walnut in Chapter 20.

Response: Text has been revised as directed.

L2.3 Text should be clarified to state that suitable capacity for wastewater treatment must be evaluated on a project-specific basis under buildout of the General Plan Update and West Valley Specific Plan.

Response: Text has been clarified.

2.2.3 Golden State Water Company (L3) (1 page)

L3.1 The service districts and service area of one district should be clarified in Chapter 20.

Response: Text has been clarified.

2.2.4 Native American Heritage Commission (L4) (5 pages)

L4.1 The EIR does not document that government-to-government consultation was conducted between the City of Walnut and Native American tribes pursuant to Assembly Bill (AB) 52.

Response: The City of Walnut did consult with Native American tribes pursuant to AB 52. A summary of the results of this consultation and documentation of such consultation has been added to the EIR.

2.2.5 Mt. SAC (L5) (5 pages)

L5.1 The land use designation for Mt. SAC's "West Parcel" is misclassified.

Response: This comment is on the proposed General Plan Update rather than on the EIR. As such, no changes to the EIR will be made. The GPU Land Use for the "West Parcel" is consistent with the existing General Plan Land Use Designation.

L5.2 The zoning for Mt. SAC's "West Parcel" is misclassified.

Response: This comment is on the proposed General Plan Update rather than on the EIR. As such, no changes to the EIR will be made and this comment will be addressed in the staff report prepared for consideration by the City Council during adoption of the General Plan Update.

L5.3 The acreage shown for Mt. SAC in a table on "Existing Land Use Distribution" in the General Plan Update is inaccurate.

Response: This comment is on the proposed General Plan Update rather than on the EIR. As such, no changes to the EIR will be made and this comment will be addressed in the staff report prepared for consideration by the City Council during adoption of the General Plan Update.

L5.4 Reference to the "Wildlife Sanctuary" should be clarified to state "Mt. SAC Wildlife Sanctuary."

Response: This comment is on the proposed General Plan Update rather than on the EIR. As such, no changes to the EIR will be made and this comment will be addressed in the staff report prepared for consideration by the City Council during adoption of the General Plan Update.

L5.5 The City should coordinate with Mt. SAC on several mentioned projects identified in the General Plan Update.

Response: This comment is on the proposed General Plan Update rather than on the EIR. As such, no changes to the EIR will be made and this comment will be addressed in the staff report prepared for consideration by the City Council during adoption of the General Plan Update.

L5.6 The land use designation for Mt. SAC's "West Parcel" is misclassified.

Response: The Land Use classification of the West Parcel as depicted in Figure 14.2 (p.14-11) and Appendix A (p.6) of the DEIR is consistent with the proposed GPU. The City acknowledges that Mt. SAC owns the West Parcel; however, property ownership does not dictate General Plan Land Use designations. As such, no changes to the EIR will be made. Since the Comment relates directly to the proposed General Plan Update, it is noted and will be addressed in the staff report prepared for consideration by the City Council during adoption of the General Plan Update. As such, no changes to the EIR will be made.

L5.7 The acreage shown for Mt. SAC in two tables showing “Existing Land Use Distribution” in the EIR is inaccurate.

Response: The Land Use classification and acreages shown on Table 3-2 and Table 14-1 of the DEIR are consistent with the Land Use designations in the proposed GPU. As such, no changes to the EIR will be made. Since the Comment relates directly to the proposed General Plan Update, it is noted and will be addressed in the staff report prepared for consideration by the City Council during adoption of the General Plan Update.

L5.8 The definition of “Student Headcount” should be clarified and the student headcount in 2017 versus 2014-2015.

Response: Definition of “student headcount” has been clarified in the text and that the number presented represents the 2017 headcount.

L5.9 The City should consider using “Weekly Student Contact Hours” or “Full-time Equivalent Students” as the student population metric for use in the Traffic Impact Analysis for the General Plan Update rather than Student Headcount. The City should use a new reported growth forecast for Mt. SAC between 0.75 to 1.22%, as well as a new reported trip distribution percentage, in the Traffic Impact Analysis.

Response: On May 23, 2017, the City’s EIR consultant, MIG, sent an email to Ms. Becky Mitchell of Mt. SAC (bmittchell@mtsac.edu) to solicit feedback on Mt. SAC’s student population, growth forecast for the student population through 2040, and trip distribution percentages for use in the Traffic Impact Analyses for the City of Walnut’s General Plan Update.

In late May 2017, Ms. Mitchell of Mt. SAC called MIG to respond. Ms. Mitchell directed MIG to obtain the requested information from Mt. SAC’s 2015 Facilities Master Plan Update EIR and the traffic study prepared for this EIR by Iteris.

The student enrollment reported in these documents was 35,986 in 2016 and projected to increase to 43,139 by the year 2026 (for a growth rate of approximately 1.8 percent). Growth forecasts were not projected through 2040.

Southern California Association of Governments (SCAG) reports an overall population growth rate of 2% for the City of Walnut through 2040 in their most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, to be conservative, and consistent with the RTP/SCS, a growth rate of 2% was utilized to calculate the student population increase from 2026 to 2040 at Mt. SAC, as these numbers were not available from Mt. SAC. This number appears consistent with Mt. SAC’s reported increase of 1.8% between 2016 and 2026 if rounded up, as well. In addition, trip generation percentages from the Iteris report were also utilized directly for the Walnut GPU Traffic Impact Analysis.

Finally, student enrollment (or student headcount) is utilized as the metric for determining traffic impacts from student populations in the RTP/SCS, rather than other metrics proposed by Mt. SAC, such as Full-Time Equivalent Students or Weekly Student Contact Hours. These proposed metrics would likely underestimate traffic impacts from Mt. SAC, would not be appropriate for use in the City of Walnut's EIR, and would not be consistent with the RTP/SCS.

Furthermore, in May 2017, Mt. SAC made no mention of a pending Parking and Circulation Master Plan now cited as a "Forthcoming Appendix to the 2018 Educational and Facilities Master Plan" where revised student enrollment and growth forecast numbers are reportedly cited.

L5.10 The 10th Edition of the Institute of Transportation Engineers (ITE's) *Trip General Manual* should be used in the Traffic Impact Analyses for the project rather than the 9th Edition.

Response: The 10th Edition of ITE's Trip Generation Manual was adopted on September 26, 2017 and the Notice of Preparation (NOP) on the EIR was released to the public on October 4, 2017.

In response to this comment, trip generation for the General Plan Update was recalculated using rates from the 10th Edition of the Trip Generation Manual and compared with trip generation rates contained in the EIR and Traffic Impact Analysis for the General Plan Update. Trip generation rates using the 10th Edition Trip Generation Manual would result in approximately 4-6% less trips generated compared to the 9th Edition rates used in the current Traffic Impact Analyses for the project. These calculations are provided in Attachment 1 of this document, for reference.

This slight difference in trip generation is not sufficient enough to alter the conclusions of the Traffic Impact Analysis for the General Plan Update, and the analysis in the EIR is the more conservative analysis of impacts. Therefore, the EIR and Traffic Impact Analysis for the General Plan Update were not revised.

L5.11 Alternate trip distribution percentages and trip generation rates should be used in the Traffic Impact Analysis for the General Plan Update.

Response: Please see response to comment L5.10.

L5.12 The City should coordinate with Mt. SAC on recommended intersection improvements contained in the Traffic Impact Analysis.

Response: Comment noted. As the City proceeds with implementation of these projects, the City will coordinate with Mt. SAC as appropriate.

L5.13 All references to "Mount San Antonio College" should be changed to "Mt. SAC."

Response: Comment noted. A global change has been made in the EIR.

List of Acronyms, Abbreviations, and Symbols	
Acronym/ Abbreviation	Full Phrase or Description
DEIR	Draft Environmental Impact Report
FEIR	Final Environmental Impact Report
GPU	General Plan Update
ITE	Institute of Transportation Engineers
Mt. SAC	Mt. San Antonio College
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
WVSP	West Valley Specific Plan

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3. DRAFT EIR REVISIONS

The following section includes all revisions to the DEIR made in response to comments received during the DEIR comment period. All text revisions are indicated by strike-through (deleted text) and underlining (added text) as errata to the DEIR. All of the revisions supersede the corresponding text in the DEIR. None of the criteria listed in CEQA Guidelines Section 15088.5 (Recirculation of an EIR Prior to Certification) indicating the need for recirculation of the DEIR has been met as a result of the revisions. In particular:

- No new significant environmental impacts due to the project or due to a new mitigation measure has been identified;
- No substantial increase in the severity of an environmental impact has been identified; and
- No additional feasible project alternative or mitigate measure considerably different from others analyzed in the DEIR has been identified that would clearly lessen the significant environmental impacts of the project.

Text revisions to the DEIR are as follows:

Global Change:

All reference to Mount San Antonio College will be changed to Mt. San Antonio College or Mt. SAC.

Chapter 18, Public Services and Recreation, Section 18.8.1, Environmental Setting

(a) Fire Protection and Emergency Medical Services

~~The City of Walnut is in the Consolidated Fire Protection District of Los Angeles County (Fire District) commonly known as the Los Angeles County Fire Department (LACFD) and receives its fire and emergency medical services from the Fire District. The Los Angeles County Fire Department (LACFD) provides fire protection, fire suppression, and emergency medical services on a contract basis for Walnut. LACFD serves over four million residents over 2,300 square miles. The department has 173 Fire Stations; it also has both a Wildland Fire Division and a Lifeguard Division. Presently, two Fire Stations in Walnut are operated by Division VIII of the LACFD:~~

- **Station 61** – Located at 20011 La Puente Road in Walnut. ~~This Station serves the City of Walnut as well as surrounding unincorporated areas, the City of Industry, and the City of Diamond Bar. This Station has a paramedic and a fire engine unit that responds to all emergencies, including accidents, fires, swift water rescues, and hazardous material spills. This station is staffed with a 2-person paramedic squad and a 3-person engine company that responds to all emergencies, including accidents, fires, swift water rescues, and hazardous materials spills. Its primary jurisdiction covers parts of the cities of Walnut, Industry, and Diamond Bar as well as surrounding unincorporated areas.~~
- **Station 146** – Located at 20604 Loyalton Drive in Walnut. ~~This station serves the City of Walnut, including Mt. San Antonio College (Mt. SAC). This Station~~

~~is known as a “critical station,” and also provides mutual aid to other cities, such as West Covina and Diamond Bar, as well as other areas, including parts of Orange County. This station’s primary jurisdiction covers a part of the City of Walnut, including Mt. San Antonio College, and some unincorporated area. This station is known as a critical station meaning that if the engine company is on an incident lasting longer than 30 minutes, the Fire District will respond with a move-up engine to temporarily cover Station 146’s jurisdiction. This station is staffed with a 3-person engine company. This Station has one fire engine and a structure to store applicable fire apparatus.~~

~~The LACFD’s response goal for emergency fire calls is within five minutes of receiving a request for assistance. This goal is achieved 90 percent of the time. The response goal for non-emergency calls is eight minutes. Figure 18-1 (sourced from Public Safety Element) shows the distance from the closest fire station to areas throughout the City.~~

Chapter 1.0, Introduction

Table 1-1 Summary of Scoping Comments

Commenting Entity	Summary of Comment	Section in EIR where Addressed
Agencies		
LA County Fire – Land Development Unit	Summarizes required development standards for buildout of the GPU and WVSP (i.e., access and water system needs).	Public Services
County Sanitation Districts of Los Angeles County	Discusses capacity of the two wastewater treatment facilities that serve Walnut. Also, discusses that for air quality impacts, must evaluate whether project is consistent with Southern California Area Government’s (SCAG) growth projections.	Air Quality, and Utilities and Service Systems
CalTrans District 7, Office of Regional Planning	Discusses State goals related to reducing per-capita vehicle miles traveled. Also discusses implications of impacts related to mixed-used development and free (or paid) parking. Caltrans notes support for mixed use development due to the associated decrease in vehicle trips.	Transportation and Circulation
City of West Covina, Planning Department	The City notes that there are single family homes adjacent to the WVSP area that are in the City limits of West Covina. The City requests a separation requirement to minimize impacts on aesthetics resources and also to minimize impacts to privacy.	Aesthetic Resources
Individuals / Private Organizations		
Castlehill Investment LLP.	The property owner suggests partnering with businesses and land owners in the WVSP area to form a “Facility District” to fund the undergrounding of utilities for aesthetic purposes.	Aesthetic Resources

Chapter 20, Utilities, Section 20.1.1 Environmental Setting

(b) Wastewater Collection and Treatment.

The City is a member of the Consolidated Sewer Maintenance District of Los Angeles County (CSMD) administered and managed by the Los Angeles County Department of Public Works (LACDPW). The LACDPW is responsible for developing a comprehensive Sewer System Management Plan (SSMP) for the CSMD. The collection system within Walnut consists of about ninety-one miles of gravity sewer lines that discharge into the Los Angeles County Sanitation Districts’ (LACSD) facilities for treatment and disposal. The LACSD constructs, operates, and

maintains facilities to collect, treat, recycle, and dispose of sewage and industrial wastes. The district serves 73 cities and unincorporated areas; the system currently treats 510 million gallons per day (mgd). About one-third of the treated water is available for re-use.

~~Treatment of wastewater from Walnut occurs at the LAGSD's San Jose Creek Water Reclamation Plant (WRP) near Whittier; biosolids and waste flows that exceed the capacity of the San Jose Creek WRP are diverted to the District's Facility in Carson. The San Jose Creek Water Reclamation Plant is designed for primary, secondary, and tertiary treatment for up to 100 mgd of wastewater and serves a population of approximately one million people; the Plant, on average, treats 64.6 mgd. The wastewater is treated at the in Joint Water Pollution Control Plant in Carson. According to the Sanitation Districts of Los Angeles County website (2017), the Joint Water Pollution Control Plant treated 259 mgd in 2015; the Facility has a permitted capacity of 400 mgd and serves about 3.5 million people. When combining the two facilities, the result produces an average of 72 gallons per day on a per capita basis.~~

The wastewater generated by the City of Walnut is treated at one or more of the following: San Jose Creek Water Reclamation Plan (WRP) located adjacent to the City of Industry, which has a capacity of 100 million gallons per day (mgd) and currently processes an average flow of 64.06 mgd; the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 256 mgd; and/or the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 20.8 mgd. The most recent population estimate for Walnut is 30,152, according to the Population and Housing Chapter of this EIR (Chapter 17); this results in an estimated 2.17 mgd of wastewater attributable to the City.

The City is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Projects that disturb surface water through their activities, discharges, are required to apply for a Water Discharge Requirements permit from the Los Angeles RWQCB. The most recent WDRs that were issued are effective as of April 17, 2015 for the San Jose Creek Water Reclamation Plant (R4-2015-0070) and a revised permit was issued on September 7, 2017 for the Joint Water Pollution Control Plant (R4-2017-0180). The WDRs establish standard Clean Water Act (CWA) effluent limitations and individual limitations on biochemical oxygen demand, total suspended solids, oil and grease, settleable solids, and turbidity.

Chapter 22, CEQA Mandated Sections, Section 22.1.14 Utilities and Service Systems

As discussed in Chapter 20, buildout of the GPU and WVSP would increase demand on utilities and service systems including potable water, treatment of wastewater, and solid waste disposal. However, based upon the existing capacity of wastewater treatment facilities serving the City, it appears that calculations indicate that there would be suitable capacity within existing systems to service the growth anticipated under the GPU and WVSP. However, sufficient wastewater treatment capacity to serve individual projects will need to be calculated and confirmed on a project-specific basis under buildout of the GPU and WVSP. This process will occur during the land use clearance stage of a project. In addition, Many goals and policies proposed under the GPU and WVSP would encourage increased recycling and conservation to reduce demand on these utilities as well. Therefore, buildout of the GPU and WVSP is not expected to have a considerable contribution to cumulative impacts on utilities and service systems in the region.

Chapter 20, Utilities, Section 20.1.1 Environmental Setting

(a) Water Supply and Distribution.

Golden State Water Company – San Dimas System Service Area

Golden State Water Company (GSWC) provides water services to the northeastern section of the City in or around open spaces adjacent to Buzzard Peak, just above Mt. San Antonio College (MSAC) via an interconnection with Walnut Valley Water District. The San Dimas System serves the City of San Dimas, portions of the Cities of La Verne, Walnut, Covina, and adjacent unincorporated area of Los Angeles County, covering a residential population of approximately 55,000. The District delivered 9,546 acre-feet (AF) of water to 16,245 municipal connections in 2015.

GSWC obtains its water supply for the San Dimas System from the Walnut Valley Water District, local groundwater from the Main San Gabriel Groundwater Basin (Basin), purchased water from the Three Valleys Municipal Water District (TVMWD), and local surface water from the Covina Irrigating Company (CIC). TVMWD obtains its imported water supply from MWD. The CIC diverts surface water from the San Gabriel River. In addition, GSWC also diverts untreated surface water from San Dimas Canyon Creek for use as golf course irrigation. The 2015 UWMP (Golden State Water Company 2016) projects the total deliveries to be higher in 2020 (13,100 AF) and to increase slightly through 2040 (13,700 AF). The target GPCD for the district was 216 GPCD in 2015; the District used 156 GPCD. GSWC serves an estimated six percent of the population in Walnut.

Chapter 18, Public Services and Recreation, Section 18.1.1 Environmental Setting

(c) Schools

Students in the City of Walnut are assigned to schools in the following two school districts: (1) the Walnut Valley Unified; and (2) the Rowland Unified School District. The schools are shown in Table 18-1. The Covina Valley Unified School District also covers a small portion of Walnut in the northeast part of the City. However, the District does not operate any schools in the City. Walnut has one high school, one middle school, and five elementary schools. All of the K-12 public schools are in the Walnut Valley Unified School District with the exception of Stanley G. Oswalt Elementary School.

Mt. SAC is a two-year community college and has a student population (i.e., student headcount) of 34,591 as of the Spring of 2017¹; this ranks the college as one of the ten largest enrollments of any public higher education institution in California. The Mt. San Antonio Community College District covers a large geographical area serving the cities of Walnut, Baldwin Park, Industry, Diamond Bar, Pomona, Covina, West Covina, San Dimas, La Verne, and several unincorporated areas including Rowland Heights, Hacienda Heights, and South San Jose Hills. The District is governed by an elected Board of Trustees.

A small portion of Cal Poly Pomona lies within the northeast section of Walnut's boundaries. The portion of the campus in Walnut contains the Voorhis Ecological Reserve, as well as agricultural fields used as part of University curricula. Classes typically are not held at the reserve; it primarily functions as an ecological reserve with some ancillary research activities.

Chapter 18, Public Services and Recreation

Table 18-1: Schools and Enrollment in Walnut

¹ Community College Management Information Systems Data Mart. 2017. Accessed on December 5. http://datamart.cccco.edu/Students/Student_Term_Annual_Count.aspx

School Name	Enrollment 2014-2015 ^{1,2}	District
Walnut High School	2,754	Walnut Valley Unified School District
Suzanne Middle School	1,347	
Cyrus J. Morris Elementary School	444	
Vejar Elementary	563	
Westhoff Elementary School	587	
Collegewood Elementary School	626	
Stanley G. Oswalt Elementary School	993	Rowland Unified School District
Mt. San Antonio College	34,591 35,986	Mt. San Antonio Community College District

Sources:

- 1Existing Conditions Report (City of Walnut 2017b) for elementary and middle schools;
~~2Community College Management Information Systems Data Mart for Mt. San Antonio College (2017)~~
 Facilities Master Plan Update EIR for Mt. San Antonio College (2015)

Chapter 16, Cultural Resources, Section 9.2.3 Environmental Impacts

Tribal Cultural Resources

Future development within the Planning Area could impact Tribal Cultural Resources (TCR) where excavation and other earthmoving activities are required. Failure to properly survey development sites and, if necessary, monitor earthmoving activities to ensure identification and recovery of TCR's or archaeological artifacts associated with TCRs could result in a significant impact due to the loss of information related to pre-historic human activities.

Pursuant to SB 18 and AB 52, on September 13, 2017, the City of Walnut contacted Native American tribes in the area to notify them of the City's proposed General Plan Update and West Valley Specific Plan and intention to prepare an EIR for the project, and offered each tribe the opportunity to consult on the project. Of the tribes contacted, the Gabrieleno Band of Mission Indians – Kizh Nation responded to the letter requesting consultation. On October 11, 2017, the City met with this tribe. The representative of this tribe notified City staff of the location of important Tribal Cultural Resources within the City boundaries including the locations of villages, battlefields, and other historic sites. The representative provided the City with recommended mitigation measures that could be implemented on a project-specific basis for consideration under buildout of the General Plan Update and West Valley Specific Plan. No further discussion was requested after October 11, 2017 by this representative. A copy of the notification provided to the tribes and meeting notes from the October 11, 2017 meeting are contained in Appendix F under Persons and Agencies Contacted.

The City currently does not have policies directly relating to the protection of TCRs during development and related earthmoving activities. Therefore, Cultural Mitigation Measures are required to avoid or minimize impacts to buried archaeological resources associated with TCRs. Cultural Mitigation Measures CR-1 and CR-3 are incorporated and will be applicable in the event of the unanticipated discovery of TCRs or archeological resources associated with TCRs. These Cultural Mitigation Measures will ensure that newly discovered TCR's and their related artifact(s) found within the proposed project site(s) will be avoided and preserved.

Appendix F Persons and Agencies Contacted

The following two letters are added to Appendix F providing documentation of consultation initiated and held between the City of Walnut and Native American tribes.

P.O. Box 682, Walnut, CA 91788-0682
21201 La Puente Road
Walnut, CA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
www.ci.walnut.ca.us



CITY OF WALNUT

September 13, 2017

Gabrieleno Band of Mission Indians- Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA, 91723

Re: Opportunity for Consultation
City of Walnut General Plan Update

Dear Andrew Salas:

The City of Walnut is updating its General Plan and is contacting you to offer an opportunity to consult with your tribe at the outset of the General Plan's amendment, in accordance with Government Code 65352.3(a)(2). If you or any members of your tribe are interested in a consult, please contact me within ninety (90) calendar days. Our Planning team is happy to provide additional information about General Plan update process, and your opportunity to participate in the Community plan's development.

Sincerely,

Tom Weiner
Community Development Director
City of Walnut

P.O. Box 682, Walnut, CA 91788-0682
21201 La Puente Road
Walnut, CA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
www.ci.walnut.ca.us



CITY OF WALNUT

September 13, 2017

Gabrieleno/ Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA, 91778

Re: Opportunity for Consultation
City of Walnut General Plan Update

Dear Anthony Morales:

The City of Walnut is updating its General Plan and is contacting you to offer an opportunity to consult with your tribe at the outset of the General Plan's amendment, in accordance with Government Code 65352.3(a)(2). If you or any members of your tribe are interested in a consult, please contact me within ninety (90) calendar days. Our Planning team is happy to provide additional information about General Plan update process, and your opportunity to participate in the Community plan's development.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Weiner", is written over a light blue horizontal line.

Tom Weiner
Community Development Director
City of Walnut

P.O. Box 682, Walnut, CA 91788-0682
21201 La Puente Road
Walnut, CA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
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CITY OF WALNUT

September 13, 2017

Gabrielino/ Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso Street #231
Los Angeles, CA, 90012

Re: Opportunity for Consultation
City of Walnut General Plan Update

Dear Sandonne Goad:

The City of Walnut is updating its General Plan and is contacting you to offer an opportunity to consult with your tribe at the outset of the General Plan's amendment, in accordance with Government Code 65352.3(a)(2). If you or any members of your tribe are interested in a consult, please contact me within ninety (90) calendar days. Our Planning team is happy to provide additional information about General Plan update process, and your opportunity to participate in the Community plan's development.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Weiner", is written over a horizontal line.

Tom Weiner
Community Development Director
City of Walnut

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Walnut, CA 91789-2018
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FAX (909) 595-6095
www.ci.walnut.ca.us



CITY OF WALNUT

September 13, 2017

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA, 90707

Re: Opportunity for Consultation
City of Walnut General Plan Update

Dear Robert Dorame:

The City of Walnut is updating its General Plan and is contacting you to offer an opportunity to consult with your tribe at the outset of the General Plan's amendment, in accordance with Government Code 65352.3(a)(2). If you or any members of your tribe are interested in a consult, please contact me within ninety (90) calendar days. Our Planning team is happy to provide additional information about General Plan update process, and your opportunity to participate in the Community plan's development.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Weiner", is written over a light blue horizontal line.

Tom Weiner
Community Development Director
City of Walnut

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21201 La Puente Road
Walnut, CA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
www.ci.walnut.ca.us



CITY OF WALNUT

September 13, 2017

Gabrielino- Tongva Tribe
Charles Alvarez,
23454 Vanowen Street
West Hills, CA, 91307

Re: Opportunity for Consultation
City of Walnut General Plan Update

Dear Charles Alvarez:

The City of Walnut is updating its General Plan and is contacting you to offer an opportunity to consult with your tribe at the outset of the General Plan's amendment, in accordance with Government Code 65352.3(a)(2). If you or any members of your tribe are interested in a consult, please contact me within ninety (90) calendar days. Our Planning team is happy to provide additional information about General Plan update process, and your opportunity to participate in the Community plan's development.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Weiner', is written over a light blue horizontal line.

Tom Weiner
Community Development Director
City of Walnut

P.O. Box 682, Walnut, CA 91788-0682
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Walnut, CA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
www.ci.walnut.ca.us



CITY OF WALNUT

September 13, 2017

Pauma Band of Luiseno Indians- Pauma & Yuima Reservation
Temet Aguilas, Chairperson
P.O. Box 369, Ext. 303
Pauma Valley, CA, 92061

Re: Opportunity for Consultation
City of Walnut General Plan Update

Dear Temet Aguilas:

The City of Walnut is updating its General Plan and is contacting you to offer an opportunity to consult with your tribe at the outset of the General Plan's amendment, in accordance with Government Code 65352.3(a)(2). If you or any members of your tribe are interested in a consult, please contact me within ninety (90) calendar days. Our Planning team is happy to provide additional information about General Plan update process, and your opportunity to participate in the Community plan's development.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Weiner".

Tom Weiner
Community Development Director
City of Walnut

Meeting with the Gabrieleno Band of Mission Indians - Kizh Nation

October 11, 2017

Overview

- The City of Walnut Staff met with Andy and Matt at the Office for the Kizh Nation (Covina) to discuss two (2) large projects within the City of Walnut.
- The first project discussed was the Citywide General Plan Update and West Valley Specific Plan.
- Andy and Matt stated that the Kizh Nation has direct, ancestral ties to prominent areas within Walnut, focusing on the area with the West Valley Specific Plan.
- Staff was shown a historical map of L.A. County, identifying prominent Historic Sites, Old Highways, Villages, Battle Fields, and graves important to the Tribe's history.
- Staff was also shown important artifacts found during various development projects that occurred within the greater San Gabriel Valley.
- Staff discussed the project known as "The Terraces at Walnut", on a 49 acre piece of land within the City, along Valley Boulevard, east of Grand Avenue.
- Staff was sent materials related to Mitigation Measures, per the Kizh nation.

4. ATTACHMENT 1 (Trip Generation Rates)

Trip Generation Rates

The following are tables illustrating the calculations for Trip Generation Rates, performed for the General Plan Update (GPU).

Table A**Project Trip Generation Rates (10th Edition)**

Land Use	Quantity	Units ¹	Source ²	Morning Peak Hour			Evening Peak Hour			Daily
				Inbound	Outbound	Total	Inbound	Outbound	Total	
Single-Family Residential	1	DU	ITE 210	0.19	0.55	0.74	0.62	0.37	0.99	9.44
Multi-Family Residential	1	DU	ITE 220	0.11	0.35	0.46	0.35	0.21	0.56	7.32
Commercial/Retail	1.000	TSF	ITE 820	0.58	0.36	0.94	1.83	1.98	3.81	37.75
Office	1.000	TSF	ITE 710	1.00	0.16	1.16	0.18	0.97	1.15	9.74
Industrial	1.000	TSF	ITE 110	0.62	0.08	0.70	0.08	0.55	0.63	4.96
Elementary School	1	ST	ITE 520	0.36	0.31	0.67	0.08	0.09	0.17	1.89
Middle School	1	ST	ITE 522	0.31	0.27	0.58	0.08	0.09	0.17	2.13
High School	1	ST	ITE 530	0.35	0.17	0.52	0.07	0.07	0.14	2.03
Community College	1	ST	ITE 540	0.09	0.02	0.11	0.06	0.05	0.11	1.15
Church	1.000	TSF	ITE 560	0.20	0.13	0.33	0.22	0.27	0.49	6.95
Parks/Recreation	1.00	AC	ITE 411	0.01	0.01	0.02	0.06	0.05	0.11	0.78

¹ DU = Dwelling Units; TSF = Thousand Square Feet; AC = Acres

² ITE = Institute of Transportation Engineers, [Trip Generation Manual](#), 10th Edition, 2017; ### = Land Use Code

Table B
(1 of 4)
Net Project Trips Generated (10th Edition)

Traffic Analysis Zone (TAZ)	Land Use	Quantity (Net Change)	Units ¹	Source ²	Trips Generated						
					Morning Peak Hour			Evening Peak Hour			Daily
					Inbound	Outbound	Total	Inbound	Outbound	Total	
TAZ 1	Single-Family Residential	+80	DU	ITE 210	15	44	59	50	29	79	755
	Multi-Family Residential	-	DU	ITE 220	0	0	0	0	0	0	0
	Residential Subtotal				15	44	59	50	29	79	755
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				0	0	0	0	0	0	0
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				0	0	0	0	0	0	0	
TAZ 1 Subtotal					15	44	59	50	29	79	755
TAZ 2	Single-Family Residential	+41	DU	ITE 210	8	22	30	25	16	41	387
	Multi-Family Residential	+29	DU	ITE 220	3	10	13	10	6	16	212
	Residential Subtotal				11	32	43	35	22	57	599
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	+5.1	AC	ITE 411	0	0	0	0	1	1	4
	Non-Residential Subtotal				0	0	0	0	1	1	4
	Elementary School	+119	ST	ITE 520	43	37	80	10	10	20	225
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				43	37	80	10	10	20	225	
TAZ 2 Subtotal					54	69	123	45	33	78	828
TAZ 3	Single-Family Residential	+52	DU	ITE 210	10	28	38	32	19	51	491
	Multi-Family Residential	-	DU	ITE 220	0	0	0	0	0	0	0
	Residential Subtotal				10	28	38	32	19	51	491
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				0	0	0	0	0	0	0
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	+20,935	ST	ITE 540	1,884	419	2,303	1,256	1,047	2,303	24,075
Educational Subtotal				1,884	419	2,303	1,256	1,047	2,303	24,075	
TAZ 3 Subtotal					1,894	447	2,341	1,288	1,066	2,354	24,566

Table B
(2 of 4)
Net Project Trips Generated (10th Edition)

Traffic Analysis Zone (TAZ)	Land Use	Quantity (Net Change)	Units ¹	Source ²	Trips Generated						
					Morning Peak Hour			Evening Peak Hour			Daily
					Inbound	Outbound	Total	Inbound	Outbound	Total	
TAZ 4	Single-Family Residential	-274	DU	ITE 210	-52	-151	-203	-170	-101	-271	-2,587
	Multi-Family Residential	+319	DU	ITE 220	35	112	147	112	67	179	2,335
	Residential Subtotal				-17	-39	-56	-58	-34	-92	-252
	Commercial/Retail	+9.100	TSF	ITE 820	5	4	9	17	18	35	344
	Office	+17.000	TSF	ITE 710	17	3	20	3	17	20	166
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-0.2	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				22	7	29	20	35	55	510
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
	Middle School/K-8	+97	ST	ITE 522	30	26	56	8	8	16	207
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				30	26	56	8	8	16	207	
TAZ 4 Subtotal				35	-6	29	-30	9	-21	465	
TAZ 5	Single-Family Residential	+195	DU	ITE 210	37	107	144	121	72	193	1,841
	Multi-Family Residential	-	DU	ITE 220	0	0	0	0	0	0	0
	Residential Subtotal				37	107	144	121	72	193	1,841
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				0	0	0	0	0	0	0
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				0	0	0	0	0	0	0	
TAZ 5 Subtotal				37	107	144	121	72	193	1,841	
TAZ 6	Single-Family Residential	+288	DU	ITE 210	55	158	213	179	106	285	2,719
	Multi-Family Residential	-	DU	ITE 220	0	0	0	0	0	0	0
	Residential Subtotal				55	158	213	179	106	285	2,719
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				0	0	0	0	0	0	0
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
	Middle School/K-8	+132	ST	ITE 522	41	36	77	11	11	22	281
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				41	36	77	11	11	22	281	
TAZ 6 Subtotal				96	194	290	190	117	307	3,000	

Table B
(3 of 4)
Net Project Trips Generated (10th Edition)

Traffic Analysis Zone (TAZ)	Land Use	Quantity (Net Change)	Units ¹	Source ²	Trips Generated						
					Morning Peak Hour			Evening Peak Hour			Daily
					Inbound	Outbound	Total	Inbound	Outbound	Total	
TAZ 7	Single-Family Residential	+54	DU	ITE 210	10	30	40	33	20	53	510
	Multi-Family Residential	+270	DU	ITE 220	30	94	124	95	56	151	1,976
	- Internal Capture ³				0	0	0	-10	-5	-15	-168
	Residential Subtotal				40	124	164	128	76	204	2,486
	Commercial/Retail	+247.772	TSF	ITE 820	144	89	233	453	491	944	9,353
	- Internal Capture ³				0	0	0	-47	-51	-98	-1,089
	- Pass-By ³				-15	-9	-24	-143	-155	-298	-980
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				129	80	209	263	285	548	7,284
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0	
High School	-	ST	ITE 530	0	0	0	0	0	0	0	
Community College	-	ST	ITE 540	0	0	0	0	0	0	0	
Educational Subtotal				0	0	0	0	0	0	0	
TAZ 7 Subtotal				169	204	373	391	361	752	9,770	
TAZ 8	Single-Family Residential	+26	DU	ITE 210	5	14	19	16	10	26	245
	Multi-Family Residential	+302	DU	ITE 220	33	106	139	106	63	169	2,211
	Residential Subtotal				38	120	158	122	73	195	2,456
	Commercial/Retail	-25.300	TSF	ITE 820	-15	-9	-24	-46	-50	-96	-955
	Office	+20.300	TSF	ITE 710	20	4	24	4	19	23	198
	Industrial	-25.300	TSF	ITE 110	-16	-2	-18	-2	-14	-16	-125
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-0.4	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				-11	-7	-18	-44	-45	-89	-882
	Elementary School	+44	ST	ITE 520	16	13	29	4	3	7	83
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				16	13	29	4	3	7	83	
TAZ 8 Subtotal				43	126	169	82	31	113	1,657	
TAZ 9	Single-Family Residential	-	DU	ITE 210	0	0	0	0	0	0	0
	Multi-Family Residential	-	DU	ITE 220	0	0	0	0	0	0	0
	Residential Subtotal				0	0	0	0	0	0	0
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	-	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				0	0	0	0	0	0	0
	Elementary School	+55	ST	ITE 520	20	17	37	4	5	9	104
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	-	ST	ITE 530	0	0	0	0	0	0	0
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
Educational Subtotal				20	17	37	4	5	9	104	
TAZ 9 Subtotal				20	17	37	4	5	9	104	

Table B
(4 of 4)
Net Project Trips Generated (10th Edition)

Traffic Analysis Zone (TAZ)	Land Use	Quantity (Net Change)	Units ¹	Source ²	Trips Generated						
					Morning Peak Hour			Evening Peak Hour			Daily
					Inbound	Outbound	Total	Inbound	Outbound	Total	
TAZ 10	Single-Family Residential	+60	DU	ITE 210	11	33	44	37	22	59	566
	Multi-Family Residential	+48	DU	ITE 220	5	17	22	17	10	27	351
	Residential Subtotal				16	50	66	54	32	86	917
	Commercial/Retail	-	TSF	ITE 820	0	0	0	0	0	0	0
	Office	-	TSF	ITE 710	0	0	0	0	0	0	0
	Industrial	-	TSF	ITE 110	0	0	0	0	0	0	0
	Religious Institution	-	TSF	ITE 560	0	0	0	0	0	0	0
	Park/Recreation	+0.3	AC	ITE 411	0	0	0	0	0	0	0
	Non-Residential Subtotal				0	0	0	0	0	0	0
	Elementary School	-	ST	ITE 520	0	0	0	0	0	0	0
	Middle School/K-8	-	ST	ITE 522	0	0	0	0	0	0	0
	High School	+270	ST	ITE 530	95	45	140	19	19	38	548
	Community College	-	ST	ITE 540	0	0	0	0	0	0	0
	Educational Subtotal				95	45	140	19	19	38	548
	TAZ 10 Subtotal				111	95	206	73	51	124	1,465
NET GENERAL PLAN TRIP GENERATION					2,474	1,297	3,771	2,214	1,774	3,988	44,451

¹ DU = Dwelling Units; TSF = Thousand Square Feet; AC = Acres

² ITE = Institute of Transportation Engineers, [Trip Generation Manual](#), 10th Edition, 2017; ### = Land Use Code

³ Internal capture and pass-by trip reductions applied to 49-acre site only based on draft Specific Plan trip generation calculations.

Table C

9th Edition Versus 10th Edition Trip Generation Comparison

Description	Trip Generation Manual ¹	Morning Peak Hour	Evening Peak Hour	Daily
Net General Plan Trip Generation ²	9th Edition	3,992	4,249	46,497
Net General Plan Trip Generation	10th Edition	3,771	3,988	44,451
Change in Trips Generated Per 10th Edition Rates		-221	-261	-2,046
% Change		-6%	-6%	-4%

¹ Institute of Transportation Engineers (ITE), Trip Generation Manual, 9th Edition (2012) or 10th Edition (2017).

² Source: City of Walnut General Plan Update Traffic Impact Analysis, Kunzman Associates, Inc., November 2017.