



CITY OF WALNUT

VIA EMAIL AND HAND DELIVERY

May 22, 2019

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

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

Dear Ms. Klein,

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

EIR Approach

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

2018 Memorandum of Agreement; Schools and Public Institutional Zoning

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

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

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

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

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

City of Walnut as Responsible Agency

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

West Parcel Site

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

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

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

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

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

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

Construction Impacts and Phasing

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

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

Mitigation measures for significant construction traffic impacts include:

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

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

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

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

Thresholds of Significance

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

Cumulative Impacts

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

Alternatives Analysis.

The DEIR includes an EFMP Moderate Growth Scenario Alternative (0.75% annual increase) and a High Growth Scenario (1.22%), based on 2016 SCAG RTP/SCS local agency forecasts within the District’s service area. Given recent declining enrollment trends at other community colleges, it is unclear why Mt. SAC is not including a Low-Growth Scenario in the DEIR. Approximately half of California’s community colleges, and three of the nine campuses in the L.A. Community College District have experienced declining enrollments in recent years¹. The District projects that its annual growth rate will range between 0.18 and 1.22 percent over the 10-year planning horizon, with a mid-point of 0.75 percent (page 3-23, Table 3-2).

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

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

Mitigation Monitoring Plan (MMP)

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

Visual Impact

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

Transportation/Traffic Impact Analysis

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

Additional Comments (Attached Matrices)

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

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

Sincerely,


Chris Vasquez
Senior Planner

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

Attachments:

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

ATTACHMENT 1

Ganddini Group Inc. 2018 EFMP DEIR Traffic Assessment



May 13, 2019

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

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

Dear Mr. Holm:

INTRODUCTION

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

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

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

2018 EFMP TIA REVIEW

Comment 1

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

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

Comment 2

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

Comment 3

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

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

Comment 4

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

Comment 5

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

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

Comment 6

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

Comment 7

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

Comment 8

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

Comment 9

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

Comment 10

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

Comment 11

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

Comment 12

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

Comment 13

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

Comment 14

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

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

Comment 15

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

Comment 16

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

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

Comment 17

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

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

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

Comment 18

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

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

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

DRAFT EIR TRANSPORTATION SECTION

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

Comment 19

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

Comment 20

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

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

Comment 21

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

Comment 22

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

Comment 23

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

Comment 24

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

CONCLUSION

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

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

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

Sincerely,

GANDDINI GROUP, INC.

Giancarlo Ganddini, PE, PTP
Principal

ATTACHMENT A

Traffic Volume Data Redlines

ATTACHMENT 2

ECORP Consulting Inc. 2018 EFMP DEIR Comment Matrices

ENVIRONMENTAL SUMMARY MATRIX

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

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

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

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

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

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

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

ENVIRONMENTAL SUMMARY MATRIX

ATTACHMENT B – AIR QUALITY AND GREENHOUSE GASES COMMENTS

Comment Number	Section	Comment – Air Quality
		<p>-Compare emissions generated by the whole of the Project to South Coast AQMD's efficiency-based threshold as opposed to the bright-line numeric threshold. This threshold is more appropriate for the scale of the Project and has the additional benefit of covering the post-2020 regulatory environment (State goals under Senate Bill 32) since it provides a 2020 threshold and 2035 threshold.</p> <p>-The Mt. SAC Climate Action Plan (CAP) seems fairly robust, and thus recommend in analyzing the Project for CAP consistency under Threshold 6.1. Essentially, swap Threshold 6.1 with 6.2.</p> <p>It is recommended that the discussion of CAP consistency be expanded to describe how CAP strategies/practices are programmed. For instance, page 4.7-23 notes that the CAP requires the college to reduce energy consumption from the 2014 baseline by 20 percent by the end of 2020, 50 percent by 2035, and 100 percent by 2050. If it could be explained more specifically how Mt. SAC plans to implement these targets, the analysis would benefit, as this CAP policy provision is quite robust.</p>

ENVIRONMENTAL SUMMARY MATRIX**ATTACHMENT C – BIOLOGICAL RESOURCES**

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

ENVIRONMENTAL SUMMARY MATRIX

ATTACHMENT C – BIOLOGICAL RESOURCES

Comment Number	Section	Comment – Biological Resources
7	Mitigation Measures	<p>Mitigation Measure BIO-1 should only apply to Intermediate Mariposa Lily, but the wording of the measure is vague and possibly misleading to apply to more plant species. The measure should be re-worded to apply only to that one species of lily, with a specific blooming period of May through July.</p>
8	Conclusions/Recommendations	<p>The Biological Resources section adequately identifies impacts for the project under CEQA, and provides adequate mitigation for biological resources impacts to reduce them to below a level of significance. Recommendations are:</p> <ul style="list-style-type: none"> -Update the Thresholds of Significance according to the latest version of Appendix G -Update Mitigation Measure BIO-1 to be more specific to Intermediate Mariposa Lily

ATTACHMENT 3

Fully Executed Memorandum of Agreement (MOA)

MEMORANDUM OF AGREEMENT

I. Parking Structure:

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

II. West Parcel:

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

MEMORANDUM OF AGREEMENT

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

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

III. Stadium (PEP) Project:

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

MEMORANDUM OF AGREEMENT

IV. Future Projects:

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

V. Miscellaneous:

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

MEMORANDUM OF AGREEMENT

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

Date: April 2, 2018



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

Date: April 12, 2018



Mary Su,
Mayor, City of Walnut

APPROVED AS TO FORM:

Date: April 12, 2018



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

Date: April 12, 2018



Barbara Leibold, Esq.
Counsel for City of Walnut