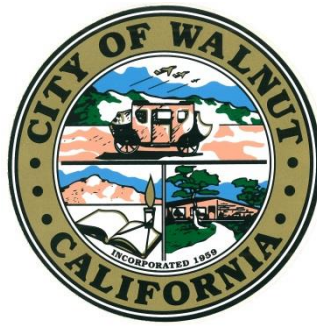


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Council Member, Robert Pacheco
Council Member, Andrew Rodriguez
Council Member, Nancy Tragarz

CITY OF WALNUT

July 3, 2017

Rebecca Mitchell
Mt. San Antonio Community College
Facilities Planning & Management
1100 North Grand Avenue
Walnut, CA 91789-5611
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(909) 274-5175

VIA E-MAIL and HAND DELIVERY

Re: *Comments to the Mt. San Antonio College District Physical Education Project (Phase 1, 2) Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR to Final Program EIR (SCH 2002041161)*

Dear Ms. Mitchell,

On behalf of the City of Walnut (the "City"), we appreciate this opportunity to review and provide comments to the District's circulation of its Physical Education Project ("PEP") (Phase 1, 2) (sometimes referred to herein as the "Project") Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR to Final Program EIR (SCH 2002041161) (the "SEIR").

Our comments are provided in several attachments that provide 1) a matrix that provides both general comments and page/section specific comments addressing the adequacy of the SEIR, and 2) letters and memoranda from our technical review team that separately detail issues and comments for Traffic, Noise and Air Quality/Greenhouse Gases (Kunzman Associates), Geotechnical (Group Delta), and Cultural, Historical and Biological Resources (ECORP).

Among our principal concerns with the organization and adequacy of the SEIR are the following:

- **Section 7.0 Alternatives Analysis.** The purpose of an alternatives analysis is to determine whether there is an environmentally superior alternative that will meet most of the Project's objectives. Consequently, a complete list of Project Objectives for the PEP (Phases 1, 2) is needed for analysis of the Project and each alternative. It is unclear from the discussion whether these alternatives 'would feasibly attain most of the basic objectives of the project' (CEQA Guidelines 15126.6).

The analysis in these sections should also specifically address whether the alternatives 'would avoid or substantially lessen' (15126.6) each of the six (6) impacts identified as unavoidable and adverse in Section 7.0. The unavoidable adverse impact associated with Land Use and

Planning, and how the alternative affects Land Use and Planning, should be discussed under each alternative. The conclusion in the SEIR is ambiguous and not adequately supported by substantial evidence as to whether Alternative 1 Revise Physical Education Project 2020 or Alternative 2 No Olympic Trials and Field Training is considered the Environmentally Superior Alternative.

The alternatives analysis should also evaluate whether the alternatives are potentially feasible, reasonable and realistic. The Stadium has been recently demolished. (See Exhibit No. 1, attached.) This means that two of the three alternatives (No Project and Alternative 1) are no longer feasible alternatives. Moreover, in its June 29, 2017 edition the LA Times notes that it has been officially announced that Mt. SAC will host the 2020 Olympic track trials. In effect, this decision removes Alternative 2 as a feasible alternative. Therefore, the SEIR does not consider any feasible alternatives, including potentially Environmentally Superior Alternatives and the No Project Alternative, as required by CEQA. A viable alternative that reduces impacts on surrounding roadways and land use is needed, as well as a No Project Alternative that reflects continuation of current conditions (e.g., no stadium on the campus).

- **Environmental and Project Baseline.** The PEP (Phases 1, 2) Project SEIR fails to establish a current, stable environmental baseline for purposes of identifying significant impacts. Although the baseline for an EIR is typically established under CEQA to coincide with issuance of the NOP, the conditions at the Project site have changed substantially with the demolition of the stadium after the NOP was published (Exhibit No. 1). With the current SEIR, the baseline should be existing site conditions with the demolition of the stadium. In numerous instances, the SEIR refers the reader to any of a series EIRs dating from the Final Program EIR certified in December 2002 with Supplemental or Subsequent EIRs in 2005, 2008, 2012 and 2016¹. The SEIR refers the reader to earlier documents with the assertion that ‘conditions have not changed’, without providing evidence of what those conditions are in 2017. It is obvious that conditions on the site have changed, because the stadium has been demolished. The changing frame of reference throughout this section for dates of relevant plans, projects and enrollments is confusing, as is the true baseline for evaluation of impacts within this SEIR. A consistent baseline is needed for existing conditions, including campus buildings, projected building activity, enrollment, and environmental setting.
- **Construction Impacts.** Additional project-level construction information is needed to adequately assess traffic, noise and air quality impacts to surrounding public roadways and residential neighborhoods. Although actual construction schedules may differ from time frames identified in this SEIR, a project-level analysis of the PEP (Phases 1, 2) requires 1) earthwork quantities, 2) a grading plan 3) an exhibit that provides a timeline (or series of timelines) representing a best current estimate for site preparation, grading and construction for Phases 1 and 2, and the individual projects included within these phases, and 4) current haul plan. These exhibits are needed to provide an adequate project-level assessment of impacts for construction traffic, grading and haul, air quality, noise and other issues.

¹ Although the SEIR refers to the Mt. San Antonio College 2015 Facilities Master Plan Update and Physical Education Projects Subsequent Program and Project DEIR (SCH 2002041161) as the “Final 2015 EIR”, it was circulated for public comment in June 2016 and certified as Final by the Board of Trustees in October 2016 and is referred to herein as the “2015 FMPU EIR” or the “2016 EIR”.

- **Excessive Reliance Upon 2015 FMPU EIR and Other CEQA Documents.** The draft SEIR is described as a ‘unique’ combination of Program EIR, Subsequent EIR and Project EIR in a single document. The SEIR falls short of adequately meeting the purposes of each of these three different types of EIRs as described in CEQA Guidelines Sections 15168, 15162, and 15161. In tiering and streamlining the CEQA review, the document is overly selective and focused in its disclosure of PEP Phase 1 and 2 impacts. The EIR repeatedly references back to the 2015 FMPU Program EIR/Subsequent PEP Project EIR without providing proper context for impact findings. In relying on these earlier documents, the SEIR also fails to provide sufficient project-level information and analysis to be an adequate project-level analysis document (see previous comment). Additionally, because the SEIR references the 2015 FMPU EIR, and the 2015 FMPU EIR references any of a series of EIRs dating back to 2002, the characterization of the baseline for environmental resources as well as the impacts of the PEP Phase 1 and 2 impacts are unclear and confusing. One of the basic purposes of CEQA is to ‘inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities’ (CEQA Guidelines Section 15002). The SEIR fails to provide a clear description of the environmental effects of the PEP Phase 1 and 2 Project.
- **Lack of Comprehensive Summary of Impacts and Mitigation Measures.** The segmentation and partial disclosure of Impacts and Mitigation Measures in Table 1.2 and throughout the SEIR frustrates a clear understanding of all environmental impacts and proposed Mitigation Measures for the PEP (Phases 1, 2). A consolidated summary table is needed that identifies all impacts and proposed mitigation measures. Again, this deficiency in the SEIR does not meet the basic purpose of CEQA to inform decision makers and the public (CEQA Guidelines Section 15002).
- **Limited Geographic Scope of Cumulative Impact Analysis.** The SEIR assertion that the geographical area for analysis of impacts other than traffic (i.e. aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gases, historical resources, parking, public services, water quality, etc.) is limited to the College campus is sweeping and made without supporting evidence. The campus is surrounded by residential areas representing sensitive local receptors for air quality, noise, visual impacts on the north, west and south. Air quality impacts are regional in scope.
- **Land Use and Zoning Regulations.** The Mt. SAC campus is located wholly within the City’s boundaries. Nevertheless, the College has demonstrated a pattern of ignoring the City’s zoning, grading, and haul route regulations. The alleged exemption from the City Zoning Ordinances approved by the Board by Resolution No. 16-03 on October 12, 2016 is beyond the scope of Government Code Section 53094 because it relates to nonclassroom facilities. The SEIR’s identification of relevant regulations should include the Walnut General Plan and Walnut Municipal Code. The District should acknowledge that the 2015 FMPU and PEP propose uses that will not be “directly used for or related to student instruction” and are not exempt from the City’s Zoning Ordinance. The College should engage in proper land use regulatory and entitlement processing in compliance with City land use requirements.

In addition, reference in the SEIR Table 1-2 to the “*Preliminary Ruling by the Superior Court upon review of the Final Mt. San Antonio College 2012 Facility Master Plan Final EIR (SCH 2002041161)*” should be revised to acknowledge the final ruling as reflected in the Judgment entered and Writ of Mandate issued on May 4, 2017.

- **Tribal Cultural Resources.** The statement that the PEP site has no established cultural tribal value is apparently based on Native American consultation conducted in 2014 and reported in the 2015 FMPU EIR. However, to properly address Item e, there must be evidence of compliance with AB 52, a formal consultation process requiring notification to Native American tribes who have requested consultation under AB 52. The purpose of the AB 52 consultation process is to identify Tribal Cultural Resources that could be impacted by the Project. AB 52 consultation is required for all CEQA documents for which a notice of preparation (NOP) is filed for an ND, MND, or an EIR after July 1, 2015. Since the NOP for the 2017 EIR was filed in April 2017 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. It is possible that no tribes requested consultation under AB 52, but if this is the case, this must be stated in the EIR.
- **Draft 2017 Mitigation Monitoring Plan.** This provides a list of mitigation measures only. Where feasible mitigation exists which can substantially lessen the environmental impacts of a project, CEQA requires those feasible mitigation measures be adopted. All mitigation measures required in the SEIR must also be fully enforceable and certain to occur. Here, the SEIR cites only minimal mitigation for the Project's significant impacts, and that mitigation proposed is vague, uncertain to occur, and unenforceable. Assurance of the ability to implement and enforce these measures is needed. Information needs to be added to each of the remaining columns, including Other Agencies/Firm Involved, Timing, Date Completed, and Responsible Party/Signature.
- **Quality Control.** Throughout the Draft EIR document there are numerous instances of sentences with words missing and incomplete sentences that, in some cases, bear on the intent of the authors. A careful proof reading of the document to clarify these sentences is needed with the Final EIR (i.e. Errata). Several of the exhibits are unreadable at their current resolution, format and scale.

Please see Attachments A through G for the more complete CEQA and technical study reviews.

Please contact Community Development Director Tom Weiner, at (909) 595-7543 ext 402; tweiner@ci.walnut.ca.us if you have any questions.

Sincerely,



Barbara Leibold, City Attorney
Leibold McClendon & Mann, PC

Exhibit No. 1: Hilmer Lodge Stadium

Attachments: A – CEQA Review

B – Traffic Review

C – Noise Review

D – Air Quality Review

E – Geotechnical Review

F – Cultural/Historic Resources Review

G – Biological Resources Review

Comments to May 2017 SEIR

July 3, 2017

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cc: Walnut City Council
City Manager Rob Wishner
Community Development Director Tom Weiner

EXHIBIT No. 1

Hilmer Lodge Stadium (Condition as depicted in the May 2017 SEIR)



Hilmer Lodge Stadium (Existing Condition July 2017)



ATTACHMENT A

**ECORP CEQA Comments on Draft Subsequent Project (SEIR) for
Mt. SAC Physical Education Project (PEP) (Phase 1,2)**

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Comment Number	Page/Section/Paragraph	Comment
1	General Comment	The PEP and Program/Project SEIR continue to be a moving target, making establishing a stable environmental baseline for purposes of identifying significant impacts difficult. The baseline for an EIR is typically established under CEQA to coincide with issuance of the NOP. With the current SEIR, that is April 2017. However, since publication of the NOP, the stadium has been demolished and significant grading has occurred on the site. In numerous instances, the SEIR refers the reader to any of a series EIRs dating from 2002-2016. The SEIR refers the reader to earlier documents with the assertion that ‘conditions have not changed’, without providing evidence of what those conditions are in 2017. In fact, conditions have changed significantly, because the stadium has been demolished and substantial grading has occurred on the site.
2	General Comment	The site-specific PEP environmental baseline has changed since issuance of the NOP in April 2017 with respect to demolition and grading activities that have since occurred at the Hillman Stadium site. Hillman Lodge Stadium has been demolished. These changed conditions are not clearly identified in the Draft SEIR and project-level impacts associated with these activities (i.e. air quality, noise, haul truck routes, aesthetics) are not specifically addressed. The Final SEIR needs to update this Draft SEIR with respect to existing conditions, and any changes to impact conclusions as a result of changed conditions.
3	General Comment	Throughout the Draft EIR document there are numerous instances of sentences with words missing and incomplete sentences that, in some cases, bear on the intent of the authors. A careful proof reading of the document to clarify these sentences is needed with the Final EIR (i.e. Errata).
4	General Comment	Introduction and Summary. This section indicates “this document is unique in that it includes three types of environmental impact reports (EIR) in one document: (1) Subsequent EIR, (2) Program EIR, and a Project EIR.” While perhaps unique, the draft EIR falls short of adequately meeting the purposes of these three different types of EIRs in a single informational document. The document is highly selective and overly focused in its disclosure of PEP Phase 1 and 2 impacts. The EIR repeatedly references back to the 2015 FMPU Program EIR/Subsequent PEP Project EIR without providing proper context for impact findings. The organization of this EIR frustrates a clear understanding of precisely what aspects of the 2015 FMPU Program EIR and PEP Project EIR are changed with this Subsequent EIR. A consolidated series of tables is recommended that provide side-by-side

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		comparisons of what specific changes are identified with respect to the FMPU Program and PEP Project Description (Phases 1, 2), Programmatic vs. Project-level Impacts, and Programmatic vs. Project-level Mitigation Measures.
5	General Comment	Thresholds of Significance. For reasons cited in its letters of April 1, 2016, to the District Board of Trustees and May 11, 2016, to Mikaela Klein, Senior Facilities Planner, the City of Walnut objects to the use of numerous imprecise and ambiguous Thresholds of Significance in the 2015 FMPU and PEP Subsequent Program/Project SEIR. As the current SEIR relies almost entirely upon the thresholds, analyses and findings of the 2015 FMPU EIR, its brief summary of impacts is similarly flawed.
6	Introduction and Summary	In describing this document as a Project EIR (p.2), there is reference to additional analysis included for the PEP project (Phases 1 and 2) for a geology/soils study, biological resources study, a structural assessment existing facilities at HLS, and an aesthetic evaluation. These studies are not located in the current SEIR Appendices. Please indicate where the reader can find this information.
7	1.4 Summary of Impacts	Table 1.2 Summary of New or Revised Impacts. The segmentation of Impacts and Mitigation Measures between this table, the reference to lists in individual topic sections, the full 2016 Mitigation Monitoring Program (10/12/2016 in Appendix G), and the complete list of Mitigation Measures recommended for the PEP in Appendix H frustrates a clear understanding of all adopted and proposed Mitigation Measures for the PEP with this SEIR. A consolidated summary table in this section is needed that lists all applicable and proposed measures, using strikethrough and underline (or similar track changes).
8	Table 1.2	Land Use/Planning – The Project requires compliance with City Zoning Ordinances and without Mt. Sac’s compliance with the City’s entitlement process to obtain a Conditional use Permit or revisions to the City of Walnut’s existing Zoning Ordinance, implementation of PEP Phase 1 and 2 would result in a significant and unavoidable conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect.
9	Table 1.2	Transportation – The first impact statement is ambiguous with its reference to ‘unusual’ parking demand. At the least, this should be identified as a significant parking demand. With respect to MM TR-20, this should be revised to provide some assurance through a performance standard that parking demand will not exceed parking capacity. The reference to the ‘Planning Plan’ is unclear. As TR-20 references TR-19 (Shuttle Route system) as part of

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		the parking mitigation, TR-19 should be identified included in Table 1.2.
10	Table 1.2	The second impact statement should identify off-campus spillover parking as a possible significant impact from the lack of parking capacity.
11	Table 1.2	The statement ‘Required Truck Hauling Plans must be reviewed by the City of Walnut’, while true, is not an impact statement per se. Truck Hauling Plans must comply with local City regulations and ordinances to mitigate potentially significant impacts on City streets and neighborhoods. Please show the referenced revisions to MMs TR-28 and TR-50 in this table.
12	Table 1.2	The fourth impact statement indicates that the PEP and 2015 FMPU/PEP will result in a less than cumulatively considerable impact to the Kellogg Drive and Interstate 10 intersection in 2020. The document does not discuss if the combined impacts of the PEP, 2015 FMPU/PEP and Olympic Trials in 2020 would result in a cumulatively considerable impact.
13	Project Description	Location and Setting .1 st paragraph. 1 st sentence should be corrected to indicate Mt. SAC is located <i>south</i> of Interstate 10
14	Project Description	3 rd paragraph. Re: ASF and other abbreviations used in this EIR. Please include a List of Abbreviations.
15	Project History	Table 2.1. Projects Under Construction (May 2017). With demolition of Hilmer Lodge Stadium (D4), unpermitted grading occurred without required City permits pursuant to Mitigation Measure TR-50.
16	Project History	The statement that “Projects occupied in 2020 are considered when future cumulative service demands (i.e. water, wastewater and energy demand) are projected for the campus” needs clarification. If this SEIR focuses on projects occurring between the baseline and projects occupied by December 31, 2020 (SEIR page 10), then future cumulative service demands for these projects should be evaluated in this SEIR (or addressed in an updated Program EIR).
17	2.3 Project Characteristics	Page 22, 2 nd paragraph. Re: reference to Appendix K. There is no Appendix K in this SEIR.
18	2.3 Project Characteristics	5 th paragraph. Reference to 2016 Relays <i>will be held</i> offsite.
19	2.3 Project Characteristics	Page 23, 2 nd paragraph. Please confirm where analysis of visual impacts of these PEP facilities can be found.
20	2.3 Project Characteristics	4 th & 5 th paragraphs. References to ‘PEC’ project. What is this? Also, where are operational

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		demands for energy, water and wastewater provided?
21	2.3 Project Characteristics	6 th paragraph. Although considered ‘unlikely’, a capacity stadium event and an aquatics event occurring simultaneously should be considered as a worst case scenario for traffic and parking impact analyses.
22	2.3 Project Characteristics	Table 2.2 PEP Statistics. Please confirm these statistics are current for April/May 2017.
23	2.3 Project Characteristics	Page 40. Re: descriptions of 2020 Olympics Track & Fields and Special Events. Though not changed from the prior 2015 Final EIR, these italicized summary descriptions are helpful for reference. It is recommended this format be replicated elsewhere in the SEIR, including the impact analyses.
24	2.3 Project Characteristics	Exhibit 2.5. Hilmer Lodge Stadium Site (2016). Please confirm if this exhibit accurately reflects April/May 2017 baseline conditions.
25	2.3 Project Characteristics	Exhibit 2.8. Erosion Control Plan. This exhibit is unreadable in its current format. There is no apparent reference or discussion in the SEIR of drainage and erosion control measures. Also, please include the current Grading Plan for PEP Phases 1 and 2.
26	2.5 Intended Uses of this EIR	Table 2.5 Responsible and Interested Agencies. Identify City of Walnut as Responsible Agency for Grading and Truck Haul Plans.
27	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	3.1 Thresholds of Significance. The complete list of thresholds being used by the District should be included in this SEIR.
28	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	3.1.1 Existing Conditions for Physical Education Project (Phase 1, 2).
29	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	A. PEP Land Use /Planning. 3 rd paragraph, last sentence. Note that future grading export will be subject to City of Walnut grading and haul requirements.
30	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	B. PEP Traffic/Parking Existing Conditions. Page 49, last paragraph. The truck hauling plan is an area of interest for the City of Walnut. Please include an exhibit of the truck hauling plan.
31	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	Reference to Supplement to an EIR is incorrect. The current SEIR is described as a Subsequent EIR.
32	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	Under the heading PEP Traffic Impact, sections A, B, and C describe at length related projects for cumulative traffic impact analysis at Cal Poly Pomona and the City of Pomona. A clear summary or synthesis as to the implications for PEP traffic and cumulative traffic impacts is needed.
33	3.0 Existing Environmental Conditions,	Figure 2 and Table 5. Existing Plus Project Conditions (Year 2014). Please clarify to which

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	Impacts and Mitigation Measures	Project these refer and the utility of using year 2014 existing conditions data.
34	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	3.1.5 (A) Cumulative Impact Analysis. 2 nd paragraph. The assertion that the geographical area for analysis of other impacts (i.e. aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gases, historical resources, parking, public services, water quality, etc.) is limited to the College campus is sweeping and made without supporting evidence. The campus is surrounded by residential areas representing sensitive local receptors for air quality, noise, visual impacts on the north, west and south. Air quality impacts are regional in scope.
35	3.0 Existing Environmental Conditions, Impacts and Mitigation Measures	3.1.6 Mitigation Measures for Traffic Cumulative Impacts. Mitigation Measure TR-60 does not indicate the status and funding mechanism for this traffic signal. If the traffic signal is not operational by 2020, the cumulative impact may be significant and unavoidable.
36	4.0 Effects Found Not to be Significant	Page 90, 1 st paragraph. Unable to locate referenced Section 3.9.
37	4.0 Effects Found Not to be Significant	Pursuant to 2017 OPR adopted CEQA Environmental Checklist (Appendix G), please add 'Tribal Cultural Resources' to CEQA Environmental Checklist issues. There is no Appendix K included with this SEIR. It is unclear why the CEQA Thresholds of Significance identified in Section 4.0 deviate from the Mt. SAC CEQA Thresholds of Significance adopted via Resolution No. 15-09. To provide adequate support for the Checklist responses in this section, please provide a list of sources of information following each of the Environmental Findings. For responses that rely upon the 2015 FMPU/PEP Final EIR provide section/page reference.
38	4.0 Effects Found Not to be Significant	Page 92. Air Quality. Please include threshold criteria a, b and c and Finding of Effect for each.
39	4.0 Effects Found Not to be Significant	Page 92. Biological Resources. Please include threshold criteria a, b and d and Finding of Effect for each.
40	4.0 Effects Found Not to be Significant	Page 93. Cultural Resources. The cultural resources section of the 2017 EIR (page 93) contains two new cultural resources CEQA checklist items that were not included in the 2015 FMPU EIR. Item d is the checklist item about disturbance of human remains and Item e is the new checklist item about Tribal Cultural Resources (AB 52). The response to Item d says that the PEP site has been graded in the past and there is no potential for human remains. The response for Tribal Cultural Resources (Item e) states that the PEP site has no established cultural tribal value. It is then stated that the PEP has No Impact on Items 5 (d,

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		e). This is true for Item d (human remains), but is unknown for Item e (Tribal Cultural Resources). The statement that the PEP site has no established cultural tribal value is apparently based on Native American consultation conducted in 2014 and reported in the 2015 FMPU EIR. However, to properly address Item e, there must be evidence of compliance with AB 52, a formal consultation process requiring notification to Native American tribes who have requested consultation under AB 52. The purpose of the AB 52 consultation process is to identify Tribal Cultural Resources that could be impacted by the project. AB 52 consultation is required for all CEQA documents for which a notice of preparation (NOP) is filed for an ND, MND, or an EIR after July 1, 2015. Since the NOP for the 2017 EIR was filed in April 2017 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. It is possible that no tribes requested consultation under AB 52, but if this is the case, this must be stated in the EIR.
41	4.0 Effects Found Not to be Significant	Page 93. Geology and Soils. Please include threshold criteria a ii) and its Finding of Effect.
42	4.0 Effects Found Not to be Significant	Page 94. Greenhouse Gas Emissions. Please include threshold criteria a) and its Finding of Effect.
43	4.0 Effects Found Not to be Significant	Page 95. Hydrology and Water Quality. Please include threshold criteria a, b and c and Finding of Effect for each.
44	4.0 Effects Found Not to be Significant	Page 95. Land Use and Planning. Please include threshold criteria b) and its Finding of Effect. Note that Land Use and Planning remains an unavoidable adverse impact, as indicated in Section 8.0.
45	4.0 Effects Found Not to be Significant	Page 96. Noise. Please include threshold criteria a) and c), and Finding of Effect for each.
46	4.0 Effects Found Not to be Significant	Page 97. Public Services. Please address effects on municipal police, fire and off-campus parks created by attendees to the OTFT and Specials Events.
47	4.0 Effects Found Not to be Significant	Page 97. Recreation. See comment re: parks under Public Services.
48	4.0 Effects Found Not to be Significant	Page 98. Transportation and Traffic. Please include threshold criteria a) and d), and Finding of Effect for each.
49	4.0 Effects Found Not to be Significant	Page98. Utilities and Service Systems. Please identify the PEP Buildout Year corresponding to PEP serviceability findings and sources of information address ability to serve OTFT and Special Events peaks for water and wastewater.
50	4.0 Effects Found Not to be Significant	Mandatory Findings of Significance. Please include CEQA Checklist criteria b) regarding cumulatively considerable impacts and provide its Finding of Effect.

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51	5.0 PEP Mitigation Monitoring Program Update	Page 100, 1 st paragraph. Unable to locate Section 3.10 referenced here.
52	5.0 PEP Mitigation Monitoring Program Update	Page 101. Mitigation Measure TR-28. This programmatic measure should also include a requirement for a parking monitoring program with assurances of adequate parking supply to meet demand with buildout of individual projects and campus events.
53	5.0 PEP Mitigation Monitoring Program Update	Page 103. Revised District Threshold of Significance. Re: Haul Routes. It is recommended this be revised as follows: <i>Haul Routes – Does the project result in export of 5,000 cy or more on any public roadway?</i> The mitigation for this potentially significant impact is provided with Mitigation Measure TR-50, as specified in Table 1.2 and Appendix H.
54	5.0 PEP Mitigation Monitoring Program Update	Page 105. In Unavoidable Adverse Impacts on page 105, it says that Hilmer Lodge Stadium, the Gymnasium, and Buildings 27A – 27C are potentially eligible as historic resources in the California Register of Historic Resources. This should be revised to say Hilmer Lodge Stadium, the Gymnasium, and Buildings 27A – 27C are eligible as historical resources in the California Register of Historical Resources. The buildings were determined eligible when the 2015 FMPU EIR was certified (no longer potentially eligible; they would now be eligible but for the fact that HLS has recently been demolished). Also, historic resources should be changed to historical resources.
55	6.0 Unavoidable Adverse Impacts	The interspersing of numbered impact statements with background explanations is confusing. Please list all the unavoidable adverse impacts (1-6) in sequence, followed by any necessary explanations of what has been added and deleted.
56	7.0 Alternatives to the Proposed Project	The SEIR evaluates three alternatives: No Project (35,986 fall enrollment headcount), Alternative 1: Revise Physical Education Project, and Alternative 2: No 2020 Olympic Track and Field Trials. The Stadium has been recently demolished. This means that two of the three alternatives (No Project and Alternative 1) are no longer feasible alternatives. Moreover, in its June 29, 2017 edition the LA Times notes that it has been officially announced that Mt. SAC will host the 2020 Olympic track trials. In effect, this decision removes Alternative 2 as a feasible alternative. Therefore, the FEIR does not consider any feasible alternatives, including potentially Environmentally Superior Alternatives and the No Project Alternative, as required by CEQA. A viable alternative that reduces impacts on surrounding roadways and land use is needed, as well as a No Project Alternative that reflects continuation of current conditions (e.g., no stadium on the campus).

ENVIRONMENTAL SUMMARY MATRIX		
Comment Number	Page/Section/Paragraph	Comment
57	7.0 Alternatives to the Proposed Project	A list of the Project Objectives for the PEP is needed for the analysis of each alternative in this section. As a complete list of Project Objective for the PEP is not included in the SEIR, it is unclear from the discussion whether these alternatives ‘would feasibly attain most of the basic objectives of the project’ (CEQA Guidelines 15126.6). The analysis in these sections should also specifically address whether the alternatives ‘would avoid or substantially lessen’ (15126.6) each of the six (6) impacts identified as unavoidable adverse in Section 7.0. The unavoidable adverse impact associated with Land Use and Planning should be discussed under each alternative.
58	7.0 Alternatives to the Proposed Project	Historic Resources. The No Project should discuss the existing conditions at the time the notice of preparation is published [15126.6 (2)]. Grading activity has already occurred within the PEP. The discussion of No Project and Alternative 1 should describe the timing and extent of grading and demolition that has already occurred, and the impact, such activity has had on the Historic District and historic Hilmer Lodge Stadium.
59	7.0 Alternatives to the Proposed Project	Table 7.1 Project Alternatives Comparisons. This table identifies Alternative 1-Revise Physical Education Project 2020 as the Environmentally Superior Alternative. [15126.6(2)]. Yet, the Preferred Alternatives (page 116) indicates Alternative 1 is not the ‘superior’ alternative. Please explain this apparent discrepancy. There is no prior discussion of the California Black Walnut Management Plan (CBWMP) and Land Use Management Area (LUMA) in Section 7.0 or elsewhere in the SEIR to support the assertion that the benefits of these make Alternative 2 the environmentally superior alternative. Moreover, there is no explanation why the CBWMP and LUMA cannot be implemented with Alternative 1.
60	Appendices	Appendices A through H need to include tabs to identify and separate each Appendix.
61	Appendices	Appendix A – Notice of Preparation and Responses. The NOP dated April 14, 2017, establishes an environmental baseline for evaluation of impacts in this SEIR. The Thresholds of Significance identified in the Initial Study Checklist are appropriate for use in the SEIR.
62	Appendices	Appendix H – Draft 2017 Mitigation Monitoring Plan. This provides a list of mitigation measures only. Assurances of the ability to implement and enforce these measures are needed. Information needs to be added to each of the remaining columns, including Other Agencies/Firm Involved, Timing, Date Completed, and Responsible Party/Signature.
63	Notice of Completion (separately provided May 19, 2017)	The NOC does not fully comply with content requirements of CEQA 15085. The project description is exceedingly brief and unsupported by any tables or exhibits. The NOC merely

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		indicates the “the project remains unchanged.” The NOC fails to include either of the methods prescribed in 15085 for identifying the location of the project (i.e. specific map, street address and cross streets) and refers the reader to the District’s website. The date under Project Title and Applicant is incorrectly shown as May 19, 2016.

ATTACHMENT B

Traffic Review (Kunzman Associates)



June 28, 2017

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
215 North Fifth Street
Redlands, CA 92374

Dear Ms. Surdzial:

INTRODUCTION

The firm of Kunzman Associates, Inc. is pleased to provide this traffic impact analysis peer review of the Mt. San Antonio College – Physical Education Project (Phase I and II) in the City of Walnut.

In a letter dated July 19, 2016, Kunzman Associates, Inc. conducted a peer review of the Mt. SAC 2015 Facilities Master Plan Update & Physical Education Projects Traffic Impact Study (Draft Report), Iteris (April 1, 2016). In a subsequent letter dated August 22, 2016, Kunzman Associates, Inc. conducted a peer review of the Mt. SAC 2015 Facilities Master Plan Update & Physical Education Projects Traffic Impact Study (Technical Appendix), Iteris (April 1, 2016). Specifically, technical appendices A, B, C, and D to Appendix B.1 were peer reviewed. Iteris provided a responses to the Kunzman Associates, Inc. peer reviews in letters dated August 29, 2016 and August 31, 2016.

The Mt. SAC 2015 Facilities Master Plan Update & Physical Education Projects Traffic Impact Study (Final Report and Technical Appendix) was prepared by Iteris (September 1, 2016). In addition, the Traffic Study Updated for PEP Phase I and II (Draft Report) was prepared by Iteris (May 3, 2017). These documents are provided with peer review comments below.

SEPTEMBER 1, 2016 REPORT

COMMENT 1

Page 3. Revise Grand Avenue to have posted speed limits ranging from 40 to 50 miles per hour.

COMMENT 2

Page 3. Revise Amar Road/Temple Avenue to have a posted speed limit of 40 miles per hour.

COMMENT 3

Page 3. Revise to “Lemon Avenue, oriented in a north-south direction, is a two-lane undivided to four-lane divided roadway...”.

COMMENT 4

Page 3. Revise Lemon Avenue to have posted speed limits ranging from 25 to 35 miles per hour.

COMMENT 5

Page 3. Revise to "Cameron Avenue terminates at Grand Avenue on the east end".

COMMENT 6

Page 4. Revise to state that Valley Boulevard allows on-street parking south of Temple Avenue.

COMMENT 7

Page 5. Intersection #6, change Montaineer to Mountaineer throughout report.

COMMENT 8

Page 10. Table 4 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 9

Page 11. Figure 3 should show existing right turn overlap and free right turn lanes at the study area intersections.

COMMENT 10

Page 11. Intersection #1 (Nogales Street & Amar Road) appears to provide sufficient width for a westbound right turn lane (defacto = minimum of 19 feet in width). Please correct in Level of Service calculations.

COMMENT 11

Page 11. Intersection #2 (Lemon Avenue & Amar Road) appears to not provide sufficient width for4 a westbound right turn lane (defacto = minimum of 19 feet in width). Please correct in Level of Service calculations.

COMMENT 12

Page 11. Intersection #11 (Grand Avenue & Baker Parkway) currently provides a southbound free right turn lane. Please correct in Level of Service calculations.

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COMMENT 13

Page 11. Intersection #13 (Grand Avenue & SR-60 EB Ramps) currently provides a 3rd southbound through lane. Please correct in Level of Service calculations.

COMMENT 14

Page 11. Intersection #16 (Lot F & Temple Avenue) does not provide southbound lanes. Please correct in Level of Service calculations.

COMMENT 15

Page 12. Typically, trip generation for junior/community colleges is based upon student full time equivalents. Please confirm or explain.

COMMENT 16

Page 15. Figure 4 assigns 24% of the project trip distribution to Grand Avenue south of Temple Avenue. However, the remaining project trip distribution south of Temple Avenue only adds to 20%. Explain.

COMMENT 17

Page 18. An areawide growth rate obtained from the latest Congestion Management Program for Los Angeles County should be included for Year 2020 traffic conditions.

COMMENT 18

Page 20. Table 7 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 19

Page 23. Table 8 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 20

Page 24. An areawide growth rate obtained from the latest Congestion Management Program for Los Angeles County should be included for Year 2025 traffic conditions.

COMMENT 21

Page 26. Table 9 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 22

Page 29. Table 10 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 23

Page 29. Table 10 shows that Grand Avenue/Temple Avenue intersection has a significant impact with mitigation. Explain.

COMMENT 24

Page 30. Confirm that Table 11 includes the following cumulative development projects that are under construction/built since 2015 traffic counts were taken:

- New Innovation Village Project, City of Pomona¹
- Tentative Tract Map No. 50867, City of Walnut²
- 20650 San Jose Hills Road Project, City of Walnut³

COMMENT 25

Page 32. Table 11 footnote should include sf = square feet.

COMMENT 26

Page 40. Table 14 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 27

Page 44. Table 15 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 28

Page 44. Table 15 shows that Grand Avenue/Temple Avenue intersection has a significant impact with mitigation. Explain.

¹ Traffic Impact Study for the New Innovation Village Research/Office Building Project, Gibson Transportation Consulting, Inc. (June 2014).

² Trip Generation Assessment associated with an Addendum to the Final Environmental Impact Report (EIR) for the Walnut Hills Development Project – Lot 269 at Walnut Hills, LLG (October 27, 2015).

³ 20650 San Jose Hills Road 26-Unit Residential Development Traffic Impact Study, Crown City Engineers, Inc. (October 2013).

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ECORP CONSULTING, INC.
June 28, 2017

COMMENT 29

Page 49. Table 16 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 30

Page 52. Table 17 footnote should include ICU = Intersection Capacity Utilization.

COMMENT 31

Page 52. Table 17 shows that Grand Avenue/Temple Avenue intersection has a significant impact with mitigation. Explain.

COMMENT 32

Page 54. 1st paragraph should reference the latest Congestion Management Program for Los Angeles County.

COMMENT 33

Page 54. Section 13 should include a discussion of current improvements being constructed at the following interchanges:

- Grand Avenue at I-10 Freeway
- Grand Avenue at SR-60 Freeway

COMMENT 34

Appendix B. Intersection # 10 (Grand Avenue & Valley Boulevard) traffic volumes are different from traffic count worksheets. Explain.

COMMENT 35

General. A queuing analysis should be performed to confirm that adequate left turn storage will be provided at the study area intersections for future traffic conditions.

MAY 3, 2016 REPORT

COMMENT 36

General. See Comments 15, 17, 20, and 24 above.

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June 28, 2017

COMMENT 37

Page 22. The Olympic Track and Field Trails Traffic section should be analyzed at the intersections included within the September 1, 2016 Traffic Impact Study.

COMMENT 38


General. A Traffic Management Plan (TMP) and Parking Management Plan (PMP) should be provided for major events.

CONCLUSION

It has been a pleasure to serve your needs on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 973-8383.

Respectfully submitted,

KUNZMAN ASSOCIATES, INC.



Carl Ballard, LEED GA
Principal

JN 7016



KUNZMAN ASSOCIATES, INC.



William Kunzman, P.E.
Principal

ATTACHMENT C

Noise Review (Kunzman Associates)



June 26, 2017

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
215 North Fifth Street
Redlands, CA 92374

Dear Ms. Surdzial:

INTRODUCTION

The firm of Kunzman Associates, Inc. is pleased to provide this noise impact analysis peer review of the Mt. San Antonio College Facilities Master Plan Update (FMPU) and Physical Education Projects Draft Subsequent Project EIR (SEIR) in the City of Walnut. Kunzman Associates, Inc. has reviewed the Technical Noise Analysis for the Mt. San Antonio College Facilities Master Plan Update and Physical Education Projects prepared by Greve & Associates, LLC (May 26, 2016).

DRAFT SEIR COMMENTS

COMMENT 1

The noise study published on the mtsac.edu website (Report #16-008NZ May 26, 2016) is different than the noise study listed in the bibliography of the most recent Draft SEIR (Report #16-002NZ April 15, 2016). Also, the bibliography lists a traffic study update, but there was no noise study update to reflect this new information.

COMMENT 2

The Draft SEIR fails to acknowledge construction noise impacts. Furthermore, the Draft SEIR improperly pushes aside any construction noise findings that are outlined within the technical noise study. Table 3.7 of the Draft SEIR says that the FMPU noise impact is less than significant with mitigation. However, the noise study clearly states on pages 44/45 that there are projects with the potential to create a significant construction noise impact; and, therefore the noise impacts associated with these projects must still be considered to be significant (see last paragraph of Section 3.1.1 of the noise study).

The findings within the Draft SEIR should be changed from less than significant with mitigation to Significant and Unavoidable. Furthermore, the Draft SEIR should list indicate the mitigation measures that are outlined within the technical noise study. The technical noise study indicates that for certain phases of construction, construction noise control plans will be required. All of these type of findings need to be identified within the Draft SEIR. The Draft SEIR needs to be revised and updated with the proper findings.

TECHNICAL NOISE ANALYSIS COMMENTS

COMMENT 3

Page 13, Table 1/Page 15 Table 2 – Tables 1 and 2 do not indicate on what days the noise measurements were taken or how long the noise measurements were for. The sources “Ambient Noise Levels” (memo to Ms. Mikaela Klein, Greve & Associates, dated August 23, 2016) and “Stadium Noise Measurements – Hilmer Lodge Stadium were given, but these memos were not found in the public file. These details should be available for review.

COMMENT 4

Page 17, Existing Roadway Noise Levels: The only assumptions listed for the traffic noise report were the ADTs and posted speed limits. There are no indications as to what vehicle mix data or roadway geometry were used in the FHWA Model. There was no source listed to find what these assumptions might have been. Please provide noise output calculations worksheets so that findings can be validated.

COMMENT 5

Page 20, Thresholds of Significance: Threshold 2 states:

*“Site-specific construction projects lasting more than one year, with site preparation, demolition, grading and shell building construction, located within 1,500 feet or less from a sensitive off-site land use have a significant construction noise impact if: (1) Construction occurs outside of permitted construction hours, and (2) Lmax noise levels from 7 a.m. to 7 pm are **less** than 90 dBA and **less** than 65 dBA Leq at any off-site sensitive receptor property line and (3) From 7 p.m. to 7 a.m., the Lmax is **less** than 75 dBA and **less** than 55 dBA Leq offsite at any off-site sensitive property line. Construction hours are defined in Mitigation Measure 5a in the Mitigation Monitoring Program as 7 a.m. to 7 p.m. on Monday through Saturday.”*

Each time that the Threshold says “less”, likely “more” was meant. This typo needs to be revised and the thresholds need to be updated.

COMMENT 6

Page 20, Construction Thresholds of Significance: Threshold #2 – It appears that Threshold #2 requires that all three (3) stipulations must be met in order for construction noise to have a significant impact. This threshold should be described in a more simplistic manner.

For example, Stipulation #1 isn’t necessary because it is covered by Stipulation #3. Stipulation #3 describes the noise limits for construction that occurs during evening/nighttime hours (7:00 PM to 7:00 AM).

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
June 26, 2017

Further simplification and clarification of the construction threshold is recommended. As it stated currently, it appears that all three (3) stipulations are required in order for the construction noise to be determined to be significant.

COMMENT 7

Page 20, Thresholds of Significance: The Threshold of Significance 4 allows for traffic-related net noise at sensitive receptors such as residences or hospitals to 70 CNEL. While analysis has been done to ensure that levels do not increase more than 3 dBA at 100 feet from the centerline, no analysis has been done to ensure that the off-campus sensitive receptor areas affected by the increased traffic noise are not pushed above 70 CNEL.

COMMENT 8

Page 37, Construction Noise: The technical noise study cites construction noise levels from “Handbook of Noise Control, Cyril Harris, 1979 (see Exhibit 8). The levels provided in this Exhibit range from 68 to 105 dBA. When comparing the construction equipment evaluated to the levels presented within Exhibit 8, the levels do not coincide. The technical noise study states that construction equipment has a range between 70 to 95 dBA at a distance of 50 feet. However, according to Exhibit 8, the peak (Lmax) noise levels for the equipment listed (graders, dozers, scrapers, front loaders, trucks, cranes, concrete mixers, and concrete pumps) are actually louder, 85 dBA to 97 dBA at a distance of 50 feet.

Furthermore, the generalized statement that Leq levels are typically 15 dB lower than Lmax (peak) levels is incorrect. For example, if a sensitive receptor is located 50 feet from the noise source, then the Leq and the Lmax would be very similar in noise reading.

The technical noise study does not adequately evaluate nor provide output construction noise calculations. It is difficult to understand what assumptions, equipment, locations are used within the construction noise evaluation. Instead, the study suggests that most of the construction will occur over 1,500 feet away from any sensitive uses and therefore the impact would be considered less than significant.

For areas where construction would occur closer to sensitive receptors there is no quantitative evaluation. At no point does the assessment evaluate the combined noise level of multiple pieces of construction equipment operating simultaneously. Instead, the technical noise study describes that there **would** be a significant impact and further evaluation would be required when more information is available.

Although a list of construction equipment may not be readily available at this time, the technical noise study could utilize the construction equipment within the air quality study and utilize either the FHWA’s construction noise model or the FTA’s construction noise methodologies to calculate the potential impact.

COMMENT 9

Page 37, Construction Noise: The technical noise study states that “The average noise levels (Leq) are typically 15 dB lower than the peak (Lmax) noise levels,” where average levels were defined as typical levels in the same paragraph. This implies that the Leq levels of the equipment are 55 to 70 dBA at a distance of 50 feet. According to Exhibit 8 (and the 2006 FTA Transit Noise and Vibration Impact Assessment), the typical noise levels of the construction equipment listed actually vary between 82 dBA and 89 dBA at 50 feet, not 55 dBA and 80 dBA as implied. While the technical noise study lists these as worst-case examples, the FTA manual lists them as typical.

COMMENT 10

Page 37, Construction Noise: The quantitative analysis also only accounted for one piece of equipment at a time. Multiple pieces of equipment are generally in operation at any given time, so their operational levels should be combined appropriately. The 2006 FTA Transit Noise and Vibration Impact Assessment provides a generally well-accepted estimation methodology for construction noise. Furthermore, the FTA manual provides the calculations to determine how much noise reduction is achieved using various mitigation measures (e.g., temporary barriers). Generalization suggestions are even provided for projects such as these, early in development.

COMMENT 11

Page 37, Construction Noise: The ambient levels from Site 7 were used as a comparison when in fact, Site 6 is closer to the stadium construction, had lower measured ambient levels, and had a more direct line-of-site to the stadium, meaning it would be more impacted than Site 7. Site 6 should have been used for comparison.

COMMENT 12

Page 38 Table 10 – The method of calculating the football stadium noise is not presented. The technical noise study simply states that noise measurements were taken at 3 stadiums, and the documentation has been provided. None of this documentation is available for viewing. The only data available is that presented in Table 2. The levels in Table 10 do not match any levels presented in Table 2. The Lmax values given in Table 2 are up to 27.7 dBA higher than the levels listed in Table 10. These levels are also lower than the Leq values given in Table 2. Using Table 2, both Site 1 and Site 2 have the potential for Leq levels up to or louder than 50 dBA Leq, which would have significant impact for games going past 10:00 PM according to Threshold of Significance 6.

Furthermore, it is difficult to understand the calculations between the reference measured levels and the projected levels. It is requested that the additional measurements and calculation worksheets be included to determine proper evaluations. Note, there is no information on the duration of the measurement.

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
June 26, 2017

COMMENT 13

Page 38, Parking Lot F: It is stated that “traffic associated with parking lots is not of sufficient volume to exceed community noise standards”, but there is no evidence/ evaluation to back up this claim.

COMMENT 14

Page 38 Table 11 – There is no source associated with the parking lot noise levels. The tables sources Site 1 from Table 1 of the study...however this measurement was performed at a residence and describes that the dominant source was traffic noise.

COMMENT 15

Page 41 Table 14 – Comment 12 applies here also. The technical noise study says the event will be well under the significance thresholds without any restrictions, yet the only significance thresholds given are the Lmax thresholds, and the levels in the table still fall below the Lmax levels presented in Table 2, even though Table 2 represents noise levels of at receivers during a game with 4500 people and Table 14 represents noise levels of 17,000 people and 20,000 people. For instance, at Site 1, Lmax levels of stadium with an attendance of about 4500 people reached 68.8 dBA during the first measurement. The predicted noise level of the 2020 Olympic Trials with an attendance of 20,000 people is predicted to have peak noise levels of 47.5 dBA.

CONCLUSION

It has been a pleasure to serve your needs on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 973-8383.

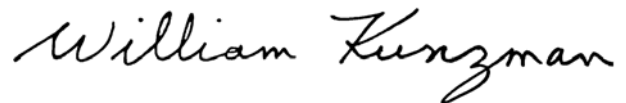
Respectfully submitted,

KUNZMAN ASSOCIATES, INC.



Mike Dickerson, INCE
Senior Associate

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William Kunzman, P.E.
Principal

JN 7016a

ATTACHMENT D

Air Quality/GHG Review (Kunzman Associates)



KUNZMAN ASSOCIATES, INC.

OVER 40 YEARS OF EXCELLENT SERVICE

June 28, 2017

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
215 North Fifth Street
Redlands, CA 92374

Dear Ms. Surdzial:

INTRODUCTION

The firm of Kunzman Associates, Inc. is pleased to provide this air quality impact analysis peer review of the Mt. San Antonio College Facilities Master Plan Update (FMPU) and Physical Education Projects Draft Subsequent Project EIR (SEIR). Kunzman Associates, Inc. has reviewed the Technical Air Quality and Greenhouse Gas Analyses for the Mt. San Antonio College Facilities Master Plan Update and Physics Education Projects prepared by Greve & Associates, LLC (April 15, 2016) (hereinafter referred to as the AQR and GHG).

AQR and AQ-RELATED DRAFT SEIR COMMENTS

GLOBAL COMMENT:

Both the AQR and GHG report analyses are poorly organized, with inadequate descriptions of what exactly is being analyzed for construction and operation of the project. It is difficult to ascertain how whatever is being analyzed relates exactly to the project as described on page 1 of the AQR, which is as follows:

Mt. San Antonio College is located in the City of Walnut on over 420 acres. It has an estimated 2014-2015 fall enrollment of 35,986 students (headcount). The college has proposed a 2015 Facilities Master Plan Update (FMPU), and the corresponding Land Use Plan is shown as in Exhibit 1. The major change from the 2012 FMP is the re-design of the athletic facilities south of Temple Avenue and east of Bonita Avenue as shown in Exhibit 2. The existing stadium will be demolished and a new stadium built on-site. Other changes for the 2015 FMPU include the relocation of the Public Transportation Center to Lot D3, and expanded Wildlife Sanctuary and Open Space area, and a pedestrian bridge across Temple Avenue connecting the Physical Education Complex to Lot F. The net increase in square footage at 2015 FMPU buildout is approximately 500,000 gross square feet. Special annual events will continue to be held on campus that include the Mt. SAC/Brooks Relays and the Mt. SAC Cross-Country Invitational (XC Invite). The District is also filing an application to host the 8-day 2020 Olympic Track & Field Trials in late July or August 2020.

The methodology is flawed, and as a result, it is difficult to determine what the impacts may actually be. It is unknown from the description given above, how many acres the improvements actually represent. Details and examples are given in the comments below.

COMMENT 1

The air quality study and greenhouse gas study published to the www.mtsac.edu website (Reports #16-008AQ April 15, 2016 and #16-008GHG April 15, 2016) are different than the AQR and GHG reports listed in the bibliography of the most recent Draft SEIR). Also, there was a Traffic Impact Study update in September 2016, but there was no indication that either the AQR and GHG reports were updated (or whether they needed to be updated) to reflect this new information; furthermore, text in the second paragraph on page 19 of the AQR cites the Traffic Impact Study as "(Iteris, January 2016)". Both the AQR and GHG report should have used (or at least refer to) the latest version of the project-specific Traffic Impact Study.

Additionally, there were no AQ or GHG technical reports available on the Mt. SAC website (<http://www.mtsac.edu/construction/reports-and-publications/environmental-impact-reports.html>) for review of the West Parcel Solar (WPS) Project.

COMMENT 2

According to the CalEEMod output in the appendices, the AQR analyzed existing emissions from a 35,986 student junior college on 420 acres. Those daily criteria pollutant emissions were reported in Table 3 on page 10 of the AQR, and also Table 3.3.4 on page 149 of the Draft SEIR.

The CalEEMod output (all winter outputs, no summer emissions provided) of the AQR also showed that analysis was performed for the following:

1. *FMPU Buildout including demolition and excluding PEP.* This analysis was done for 259.02 TSF of junior college land use on 5.95 acres, operational in 2025, with construction from 1/1/2017 to 3/23/2018.
2. *FMPU - Building G construction and demolition.* This analysis was done for 50 TSF of junior college land use on 5 acres, operational in 2021, with construction from 1/1/2019 to 2/24/2020.
3. *FMPU - Building A construction (No demolition).* This analysis was done for 50 TSF on 1.15 acres, operational in 2025, with construction from 1/1/2025 to 12/11/2025 (construction output includes demolition, even though it should not [according to the title]).
4. *FMPU - 2020.* This analysis is for a 39,731 student junior college land use (1,734,347.04 of floor surface area) on 39.82 acres. Operational in 2020. No construction emissions report is included with this output, so it is assumed that this CalEEMod run represents operational emissions only.
5. *FMPU - 2025.* This analysis is for a 46,139 student junior college land use (1,883,113.86 of floor surface area) on 43.23 acres. Operational in 2025. Again no construction emissions report, so it is assumed that this CalEEMod run represents operational emissions only.
6. *PEP - Phase 1 - Construction Only.* This analysis is for a 91.73 TSF junior college land use on 2.11 acres, general light industry of 79.40 TSF on 1.82 acres, 174.43 TSF of other non-asphalt surfaces on 4 acres, 107.57 TSF of parking lot land uses on 2.47 acres, and 21.80 acres of city park land uses, operational in 2019, with construction from 10-3-2016 to 8-16-2018.
7. *PEP - Phase 2 - Construction Only.* This analysis is for a 117.90 TSF junior college land use on 2.71 acres, enclosed parking structure (to simulate pool area) of 23.09 TSF on 0.53 acres, and 68.81

TSF of other non-asphalt surfaces (to simulated tennis courts) on 1.58 acres, operational in 2021, with construction from 2/1/18 to 9/28/2020.

On page 12 of the AQR under subheading 2.2.1.1 Overall Construction Emissions, it states that the "long-term buildout of the 2015 FMPU will result in new construction of 454,485 square feet (including PEP). To make room for some of the new construction, demolition of some existing buildings is necessary. The FMPU indicates that approximately 122,976 square feet will be demolished." When the square footage for "FMPU Buildout including demolition and excluding PEP" for the junior college land use of 259.02 TSF is added to PEP Phase 1 JC land use of 91.73 TSF and PEP Phase 2 JC land use of 117.90 TSF, the total is 468,650 SF, which is a smaller amount from the "500,000 gross square feet" detailed in the project description, and a larger amount from the "454,485 square feet (including PEP)" given both in the report and above. Page 146 of the Draft SEIR, third paragraph down, has a different number again (454,906 SF). Which is the correct square footage? The largest square footage possible needs to be analyzed to calculate the project's potential "worst-case" construction-related impacts.

The analysis needs to be revised with the correct square footage using the latest version of CalEEMod (version 2016.3.1) and the findings within the Draft SEIR should be revised as needed, with the proper results.

COMMENT 3

Several areas in the CalEEMod output conflict with the information provided in the text of the AQR. For example:

- a) On page 15 of the AQR under the subheading 2.2.1.3 *Construction Emissions for Building A*, it states there that Building A will be 167,200 gsf by 2025. Whereas the CalEEMod output shows that the analysis of Building A (No Demolition) is for a 50.00 TSF junior college on 1.15 acres; therefore, emissions for Building A are under-reported and the emissions need to be revised and re-analyzed for inclusion in Tables 8 and 9 of the AQR. Furthermore, according to the output header and the text on page 15, "Demolition will be required to clear the site for Building A, but this was assumed to occur during the construction of Building G." However, demolition was analyzed for this part of the project, and the demolition emissions were reported under the Demolition Activity in Table 8 on page 16 and Table 9 for the LST analysis on page 17 of the AQR. It is unknown how many SF of existing buildings (16, 18, 18, 19 and 21) were analyzed as being demo'd, as there are no details in the report or CalEEMod output regarding what the building square footage is for the buildings being demo'd. Therefore, those details need to be made clear and described in the text of the revised AQR and Draft SEIR.
- b) The CalEEMod Output with the heading PEP - Phase 1 - Construction Only, shows an analysis for a 91.73 TSF junior college land use on 2.11 acres, general light industry of 79.40 TSF on 1.82 acres, 174.43 TSF of other non-asphalt surfaces on 4 acres, 107.57 TSF of parking lot land uses on 2.47 acres, and 21.80 acres of city park land uses. It is unknown what part of PEP Phase 1 is represented by the general light industrial land uses, other non-asphalt surfaces use and the 21.80 acres of City park uses. These details need to be included, in a similar manner as they were for PEP - Phase 2.

- c) On page 13 of the AQR, 1st paragraph, it states "It was also assumed that the overlap between construction phases would be minimal." However, although the construction for the portions of each phase of the FMPU may not overlap, as shown by the construction timing given in the CalEEMod output, portions of the construction FMPU overlap with the construction of the PEP; therefore, those overlapping construction emissions for the FMPU and the PEP need to be added together and compared against the regional daily thresholds. Furthermore, as shown above (taken from the CalEEMod output), PEP phase 1 overlaps with PEP phase 2 in 2018, as construction of PEP phase 1 is from 10-3-2016 to 8-16-2018 and construction of PEP phase 2 goes from 2/1/18 to 9/28/2020. Therefore, the overlapping portions of PEP phase 1 and 2 construction should to be added together, then added to the overlapping portion of the FMPU, for a combined total for maximum daily construction emissions that can be compared against daily regional construction thresholds.

COMMENT 4

The values reported in Table 5 on page 13 of the AQR and also Table 3.3.9 on page 156 of the Draft SEIR incorporates flawed methodology. In Table 5, the total emissions for FMPU (excluding PEP), PEP phase and PEP phase 2 were added together and the values shown in the Total Construction row. Those emissions were then divided by either 5 years or 10 years, then those emissions were then compared to the SCAQMD daily construction emissions thresholds. This methodology is incorrect, as the SCAQMD requires that the project's maximum daily emissions be compared to the mass daily significance thresholds.

It is understandable that, for a Master Plan, precise construction timing may not available; however, the most conservative, worst-case scenario should be ascertained and analyzed, then those resultant emissions can then be compared to the mass daily significance thresholds. It is incorrect to average criteria pollutant emissions over the 5 or 10 years of potential project construction to then compare those average values to the thresholds. This type of analysis completely under-estimates the project's maximum daily emissions. The construction activities during the 5 or 10 year duration of construction should be accurately modeled in CalEEMod, using those time frames (as applicable) to the extent feasible.

Construction emissions need to be re-modeled using correct methodology and the latest version of CalEEMod. It is likely that construction-related emissions will be significant. Furthermore, it is unknown whether the construction and operation of the West Parcel Solar (WPS) Project will overlap this project, as details and technical AQ-GHG reports were not available for review. This information would need to be verified and included as part of the cumulative impact review.

COMMENT 5

Operational emissions were reported in Table 10 for Existing, Year 2020 and Year 2025. Per the Traffic Impact Study, the project is expected to grow by an additional 3,745 students by 2020 and then by a total of 7,153 students by 2025. As the majority of project-related emissions are sourced from vehicles, and the project will adding 4,606 daily vehicle trips in 2020 and a total of 8,798 vehicle trips by 2025.

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
June 28, 2017

The operational analysis needs to be consistent with the project as analyzed in the Iteris Traffic Impact Study, which does not discount any project-related trips by subtracting existing trips. Existing emissions values should only be subtracted from project emissions values if the existing operational portion of the site will no longer be operational (and generating emissions) once the project becomes fully operational in 2025. This is not the case, and the added trips from new students will only increase the overall regional operational emissions sourced from the Mt. SAC campus.

Per SCAQMD recommendations, when measuring project emissions, it is appropriate to include regulatory requirements, such as the federal and state regulations that require vehicles to be more efficient and lower-emitting. However, "the proposed Project's emissions themselves should not be masked by comparing it to an existing condition baseline where air quality is worse than what it will be when the proposed Project is operational¹" It is appropriate to assume that vehicles will comply with existing regulatory requirements; however their increase in activity and the additional 8,798 trips needs to be accounted for and shouldn't be masked by improvements brought on by those regulations. Therefore, the analysis of the project-related operational emissions should be remodeled using 3,745 additional students for year 2025 and a total of 7,153 additional students for 2025 buildout (as detailed in the Traffic Impact Study). Those emissions then need to be compared to the regional mass daily operational thresholds to ascertain whether just the project-related increase in student vehicular traffic volumes exceed SCAQMD operational thresholds.

COMMENT 6

CO Hot Spot analysis on pages 18 and 19 of the AQR cited the Iteris January 2016 Traffic Impact Study. The latest (final) Traffic Impact Study is dated September 1, 2016. Please verify that no changes to intersection volume data are needed due to changes in the final Traffic Impact Study.

COMMENT 7

According to page 11 of the Draft SEIR, "(18) All Special Events maximum daily attendance increases for 2015 – 2020 will be evaluated with specific focus on hosting the 10-day 2020 Olympic Track & Field Trials (i.e., air quality, noise, traffic, parking)."

In Section 2.2.4 Local Air Quality During Olympic Trials, the only pollutant examined was CO at intersections within the project vicinity. According to the Iteris 2020 Olympic Track and Field Trials Focused Traffic Study, there is a projected maximum event attendance of 20,000 guests. Analysis of the additional mobile source criteria pollutant emissions should also be conducted to evaluate the increase in project-related operational emissions due to hosting the Olympic Trials at the Mt. SAC campus. There is no trip generation data available in the Iteris 2020 Olympic Track and Field Trials Focused Traffic Study; therefore, that information would need to be generated by the traffic analysts, in order for the AQ-GHG analysts to model the AQ-GHG emissions impacts for all criteria pollutants and GHGs for the duration of the Olympic Trials.

¹ SCAQMD Comment Letter on the Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed General Plan Amendment No. 960: General Plan Update Project, April 3 2015, *available at*: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/april/deirno960.pdf?sfvrsn=2>.

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
June 28, 2017

Analysis and discussion of all of the criteria pollutant emissions sourced from the additional traffic due to the 2020 Olympic Track and Field Trials need to be included in the AQR.

COMMENT 8

Section 2.2.5 Compliance with Air Quality Planning, the revised report will need to reference the latest, approved, 2016 version of the AQMP.

COMMENT 9

Section 2.3.3 Diesel Particulate Matter Emissions During Construction. Please update this section to reflect the latest OEHA and SCAQMD-preferred methodology which uses a 30-year exposure instead of 70-year. As SCAQMD does not currently require construction-based HRAs, a discussion of the localized construction-sourced PM emissions should be included, to show that construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local thresholds. Therefore, no significant short-term toxic air contaminant impacts are anticipated during construction of the proposed project. This statement could vary, depending on the results of the revised construction analysis.

COMMENT 10

Section 2.4 Cumulative Impacts only addresses local CO impacts from CO hot spots. The potential cumulative impacts of the other criteria pollutants (VOC, NOx, SOx, PM10 and PM2.5) also need to be addressed/analyzed within this section.

COMMENT 11

Section 3.2 Short-Term Impacts, under 3.0 Mitigation Measures on page 30 of the AQR states that the NOx emissions during grading of PEP Phase 1 exceed SCAQMD Thresholds. Mitigation Measure AQ-1 requires the use of Tier 4 engines in equipment greater than 50 hp. This mitigation measure is supposed to reduce the NOx emissions during grading from 147.2 lbs per day down to 75.7 lbs per day, and references the CalEEMod output in the appendix. However, when the CalEEMod for PEP Phase 1 (dated 3/24/2016 @ 9:58 AM) is reviewed, the mitigated portion of the grading output shows onsite grading emissions of 74.8137 lbs and offsite grading emissions to be 72.4028 lbs, which give a total mitigated grading emissions value of 147.2165 lbs. Therefore, it is unclear where the mitigated value of 75.7 lbs per day, as reported above, came from, as it is not included in the CalEEMod Appendix.

An additional Table showing the mitigated construction results for comparison to SCAQMD construction thresholds for PEP Phase 1 should be included in the report. Furthermore, the discussion of the efficacy of the mitigation measure should be separate and not included as part of the mitigation measure.

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
June 28, 2017

COMMENT 12

Section 4.0 Unavoidable Significant Impacts will potentially need to be revised for both short-term and long-term impacts pending revisions based on previous comments.

COMMENT 13

The air quality section of the Draft SEIR will also need to be revised, as needed, based on the revisions to the AQR.

GHG and GHG-RELATED DRAFT SEIR COMMENTS

COMMENT 14

On page 33 of the GHG report, the operational GHG emissions were handled in a manner similar to the way the operational criteria pollutant emissions were handled. Similar to what was discussed in comment 5 above, subtracting the existing emissions of 56,762 MTCO₂e/year from either the year 2020 GHG emissions of 55,764 MTCO₂e/year or year 2025 GHG emissions of 59,006 MTCO₂e/year is not correct and does not account for the increase of 4,606 daily vehicle trips from additional students in 2020 and a total of 8,798 vehicle trips from the total increase in students by 2025.

The operational GHG analysis needs to be revised as detailed in comment 5 above. It is anticipated that the project will exceed the SCAQMD and Mt. SAC-adopted GHG threshold of 3,000 MTCO₂e/year; therefore, as stated on page 25 of the GHG report, "the annual emissions per service population (the number of students and persons employed by the college complex in this case) should not exceed 4.6 MTCO₂EQ/yr, or a significant impact will be determined." As the GHG emissions will be based on the increase in the number of students, the service population used to determine significance should also be based on that same number of students (plus any additional staff anticipated to be employed by 2025 to meet the needs of these additional students).

COMMENT 15

Similar to what was stated above in comment 3 a), Section 2.2.2 Construction Emissions for Building A on page 27 of the GHG report states that Building A will be 167,200 gsf by 2025. Whereas the CalEEMod Annual output shows that the analysis of Building A (No Demolition) is for a 50.00 TSF junior college on 1.15 acres; therefore, GHG emissions for Building A are under-reported and the emissions need to be revised and re-analyzed for inclusion in Tables 5 and 9 of the GHG report. Furthermore, according to the output header and the text on page 27 of the GHG Report, "Demolition will be required to clear the site for Building A, but this was assumed to occur during the construction of Building G." However, demolition was analyzed for this part of the project, and the demolition emissions were likely included in construction totals in both Table 4 and 8.

Ms. Anne Surdzial, Director of CEQA/NEPA Services
ECORP CONSULTING, INC.
June 28, 2017

COMMENT 16

Similar to as stated above in comment 7, analysis and discussion of all of the GHG emissions sourced from the additional traffic due to the 2020 Olympic Track and Field Trials need to be included in the revised GHG report.

COMMENT 17

Conclusions drawn on page 35 of the GHG Report regarding the significance of the GHG emissions will need to be revised based on the aforementioned comments and mitigation measures will likely be required.

Furthermore, the GHG section of the Draft SEIR will also need to be revised based on the requisite revisions to the GHG Report.

CONCLUSION

It has been a pleasure to serve your needs on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 973-8383.

Respectfully submitted,

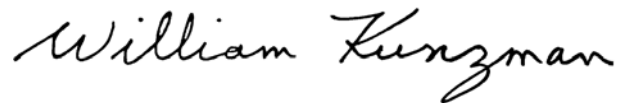
KUNZMAN ASSOCIATES, INC.



Katie Wilson, M.S.
Senior Associate

JN 7016b

KUNZMAN ASSOCIATES, INC.



William Kunzman, P.E.
Principal

ATTACHMENT E

Geologic Review (Group Delta)



GROUP DELTA

June 26, 2017

Mr. Thomas F. Holm
Senior Environmental Manager
ECORP Consulting, Inc.
1801 Park Court Place, B-103
Santa Ana, California, 92701

Subject: City of Walnut Third Party Review of
Geotechnical Study Report
City of Walnut, Mount San Antonio College
Physical Education Project (PEP)
Walnut, California

Reference: Converse Consultants, Geotechnical Study Report (Final), Proposed Athletic Complex
East, Mount San Antonio College, Walnut, California, January 23, 2015.

Dear Mr. Holm,

Group Delta is pleased to present this letter report summarizing the findings of our third-party review of the referenced report in support of the preparation of Environmental Impact Report (EIR) documentation for the proposed City of Walnut Mount San Antonio College (Mt. SAC) Physical Education Project (PEP).

Project Understanding

We understand that the referenced report is intended to be used as technical background for preparation of CEQA-related geologic/geotechnical hazards sections of the Environmental Impact Report (EIR) documentation for the proposed City of Walnut Mt. SAC Physical Education Project (PEP). The proposed PEP is in planning phase and consists of a new athletic complex within the southeast portion of the Mt. SAC campus. New multi-level structures, bleachers, bridges, pavements, and retaining walls are included in the proposed athletic complex development.

Our review scope of work included the following items.

- Review of preliminary project plans or other information which provides a description of the proposed project.
- Review of the geologic/geotechnical report by Converse Consultants, including:
 - Review that CEQA geologic hazards have been addressed in the report.
 - Review that geotechnical design recommendations have been performed in accordance with the 2016 California Building Code.
 - Review public sources of information that identify geologic hazards, such as Alquist-Priolo fault maps and State of California Earthquake Hazard Zones.
 - Review geologic/geotechnical data presented in the report.
 - Review the analyses and results presented in the geologic/geotechnical report.

- Assess the need for additional geotechnical work.
- Review measures presented in the geologic/geotechnical report to mitigate geologic hazards.
- Preparing this letter report with review comments, including observations on the need for additional geotechnical investigation.
- Review the responses to review comments by the preparer of the geologic/geotechnical report for the project. Our scope includes one round of review comments and review of responses to those comments.

Review Comments

The following is a list of our third-party review comments for the referenced report.

1. No site plans which included proposed grades were available for review at the time of this letter.
2. Include a site plan with current and proposed grades as well as geology. Define maximum cuts and fills.
3. CEQA Check list items for geologic hazards at the site including: fault rupture, strong ground shaking, lateral spreading, inundation, seiche, tsunami, volcanic eruption, and expansive soils; have been adequately addressed.
4. CEQA Check list items for geologic hazards at the site including: seismic history, liquefaction, landsliding, soil erosion/debris flow, flooding, and hazardous minerals; need to be further addressed as follows.
 - a) Discuss any historical earthquake related impacts at the campus.
 - b) Discuss historical high ground water at the site and relate to liquefaction analysis performed. Provide a discussion of liquefiable/dry seismic settlement layers and how it relates to stratigraphy encountered across the site.
 - c) Extend cross sections to include the perimeters of the site. Include significant slopes onsite and adjacent to the site. Discuss stability of proposed slopes and neighboring natural slopes and potential impacts to the proposed development. Provide a recommendation to address potential hazards.
 - d) Identify surface drainage pathways onto and across the site and discuss potential impacts to the proposed development. Provide a recommendation to address potential flood hazard.
 - e) The California Geological Survey (CGS), Radon Potential Zone Map for Southern Los Angeles County, California, dated January 2005 (available online), indicates the site is located within an area with a moderate potential for indoor-radon levels above 4.0 Picocuries per Liter, the Environmental Health Division action level. Discuss the potential hazard and impacts to the proposed project. Provide a recommendation.
 - f) Discuss potential methane, oil and gas hazard and impacts to the proposed project. Include proximity to nearby landfills and active wells within 0.25 miles. Provide a recommendation.
5. Identify the general location and depth of buried canyon drain in relation to proposed buildings. Show on plan and cross sections. Discuss potential project impacts and provide a recommendation.
6. Seismic parameters are calculated using the United States Geological Survey U.S. Seismic Design Maps website application. While the site coordinates (latitude and longitude) stated in Section 6.1 of the subject report appear to be incorrect (inconsistent with site coordinates noted in

Section 2.1), based on our independent check, the values provided in Table No. 3 are in fact correct for the subject site. Update the table with appropriate coordinates.

7. The report also includes a site-specific hazard analyses as required by Section 1616A.1.3 of 2016 CBC, in accordance with Section 21.2 of ASCE 7-10. The site-specific response spectrum data, and seismic design parameters presented in Tables No. 5, and 6, respectively appear to be correctly evaluated, and adequately addressed.
8. The field exploration, laboratory testing, and analyses of subsurface conditions, appear to be adequate per Section 1803 of 2016 CBC, and meet the current local standard of care in geotechnical practice.
9. The report adequately provides grading recommendations per Section 1804 including need for over-excavation, and removal of unsuitable soils, canyon bottom subdrains, site drainage, subgrade preparation, re-use of on-site materials, compaction of fill material, cut/fill transitions, and trench backfill requirements.
10. The report provides adequate and generally reasonable recommendations regarding vertical and lateral capacity, and the anticipated static and seismic settlement of shallow foundations, and relatively short caisson foundations, as well as vertical and lateral capacity recommendations for cast-in-drilled-hole (CIDH) piles. The recommendations are generally in accordance with Section 1808, 1809, and 1810 of 2016 CBC.
11. The report provides lateral earth pressures for cantilever and restrained retaining walls with a level backfill, and additional surcharge for inclined backfill, as well as includes recommendations for retaining wall drainage. The report also provides seismic earth pressures for walls taller than 6 feet, as required by Section 1615A.1.6 of 2016 CBC.
12. A limited screening of soil corrosivity was included in the subject report. The report includes some preliminary corrosion mitigation measures, but recommend that a corrosion consultant be consulted for appropriate mitigation procedures and construction design. A more comprehensive corrosion evaluation should be performed as recommended in the subject report.
13. The report also includes adequate recommendations for temporary sloped and shored excavations. The recommendations for shored excavations include lateral earth pressures for cantileveled shoring, and braced shoring, recommendations for the design of soldier piles, recommendations for allowable capacity of drilled anchors, and surcharge pressures on the shoring.

If you have any questions, please feel free to contact the undersigned.

Sincerely,
GROUP DELTA CONSULTANTS, INC.



Piroot Kashighandi, Ph.D., P.E.
Senior Engineer



Michelle A. Sutherland, CEG #2577
Senior Engineering Geologist

Distribution: Addressee (1 PDF file via email)

ATTACHMENT F

Cultural Resources Review (ECORP)



June 27, 2017
(2017-140)

Barbara Liebold, City Attorney
c/o Liebold McClendon & Mann
9841 Irvine Center Drive
Irvine, CA 92618

Subject: CONFIDENTIAL AND PRIVILEGED INFORMATION -- Review of Cultural Resources Technical Reports and Cultural Resources Sections of Environmental Documents for Mount San Antonio College 2015 Facilities Master Plan and Physical Education Projects, Walnut, Los Angeles County, California

Dear Ms. Liebold:

I have reviewed the cultural resources technical report and the cultural resources EIR sections prepared for the Mount San Antonio College Master Plan Update and Physical Education Projects, Walnut, Los Angeles County. The reviewed reports/sections are:

Appendix H – Cultural Resources, in 2015 Facilities Master Plan Update and Physical Education Projects: Draft Subsequent Program/Project EIR to Final Program EIR (SCH 2002041161), Appendices, Volume 2 of 2

Cultural Resources Sections 3.6, 3.7.1 I, 3.7.2 I, 3.8.1 I, 3.8.2 I, 3.8.3, 4.2 in 2015 Facilities Master Plan Update and Physical Education Projects: Draft Subsequent Program/Project EIR to Final Program EIR (SCH 2002041161) (2016), Volume 1 of 2

Cultural Resources Mitigation Measures in Appendices G (2016) and H (2017) in Physical Education Project (Phase 1, 2) Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR (SCH 2002041161), Volume 2

Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR (SCH 2002041161): Physical Education Project (Phase 1, 2) (2017)

Appendix H is the evaluation report for additional buildings, including the stadium and associated buildings, that will be impacted by the project at Mount San Antonio College (SAC). The Mount SAC Historic District (District) was previously evaluated as eligible in a technical report prepared in 2012. The current technical report (Appendix H) evaluates the Hilmer Lodge Stadium (Stadium) and associated buildings as individual properties and as contributing elements to the District. The District was evaluated as eligible for the CRHR under Criterion 1 (association with important historical events) in 2012. Appendix H summarizes the District's eligibility under Criterion 1 and states again that the District is recommended as eligible. The District retains integrity because 33 of 44 (75 percent) contributing elements remain. The Stadium (and associated facilities) is evaluated as individually eligible and as a contributor to the District. I agree with these evaluations. Appendix H also correctly states that the District and the Stadium, as resources eligible for the CRHR, are historical resources as defined by CEQA.

The Stadium is proposed for demolition as part of the project. Appendix H correctly states that demolition of the Stadium will result in a substantial adverse change in the significance of a historical resource. Renovation is proposed for the Library, Bookstore, and Technology Center, which are contributing elements to the District and, therefore, historical resources under CEQA. However, if the Secretary of the Interior's Standards for Rehabilitation are followed during renovation, the project will not result in a significant direct impact to a historical resource, as correctly stated in Appendix H. It is also correctly stated in Appendix H that demolition of the Stadium will result in an adverse visual impact on the District.

Appendix H contains recommended mitigation measures including standard measures for unanticipated discovery of archaeological material and human remains. For the historic period buildings that are contributing elements to the District and individually eligible properties, it is recommended that the project be redesigned to avoid demolition of them. If redesign to avoid demolition is not feasible, other measures to document and interpret the historical resources are recommended. These measures include a HABS Level II narrative report, large format photos, and reproduction of as-built drawings; establishment of Heritage Hall with interpretive panels in the new stadium; and providing a history of Mount SAC on the school's website. These mitigation are appropriate.

Appendix H correctly states that demolition of a historical resource cannot be mitigated to less than significant using the recommended mitigation measures. Even with the mitigation measures applied, there would still be a substantial adverse change in the significance of a historical resource.

I agree with the evaluation, analysis of impacts, and recommended mitigation measures in Appendix H. However, there is a repeated use of improper terminology. The correct term for a significant cultural resource as defined by CEQA is "historical resource" [CCR Title 14, Section 15064.5(a)]. However, the incorrect term "historic resource" is used in several places in the document. Instances of this occur in the third paragraph of the Executive Summary, the second paragraph of the Introduction, the first paragraph on page 65, and on pages 69, 71, 73, and 75. In addition, the Area of Potential Effects (APE) is used in the Executive Summary and in the Introduction. The term APE is used only in Section 106 (federal projects subject to NEPA) documents. For CEQA documents, the term project area or study area should be used.

The cultural resources sections of the 2016 EIR are well written and follow the CEQA Guidelines for cultural resources. The evaluation recommendations from the technical report are correctly stated as determinations. Cultural resources that are recommended as eligible in a technical report are determined to be eligible when the EIR is certified and therefore are Historical Resources. The impacts analysis from Appendix H is correctly repeated and the mitigation measures recommended in Appendix H are now required in the EIR. There is a minor issue with the mitigation measures. In Appendix H there was a summary paragraph for the measures for buildings to be demolished. This was followed by details of each measure contained in the summary paragraph. In the EIR, the summary paragraph has become CR-04 and the details of each measure are in CR-05 through CR-09. I don't think CR-04 should be a mitigation measure since it is only a summary of the rest of the mitigation measures.

The EIR correctly states that even with the mitigation measures applied, there would still be a substantial adverse change in the significance of a historical resource and therefore, an unmitigated significant impact because documentation and recording of historic-period buildings that are Historical

Resources and that will be demolished will not reduce impacts to less than significant, as found in the Oakland Montgomery Ward case (which is cited in the EIR). A Statement of Overriding Considerations (SOC) is required for unmitigated significant impacts. The 2015 EIR refers to an SOC prepared for the 2012 EIR, but I do not see a reference to an SOC for the unmitigated significant impact resulting from demolition of the Stadium which was only analyzed in the 2015 EIR.

There is also an instance of the use of historic resource rather than historical resource on page 261 of the EIR.

The mitigation measures are repeated in the Cultural Resources Mitigation Measures in Appendices G (2016) and H (2017).

The 2017 PEP EIR incorporates the 2016 EIR by reference. Thus, the same impacts analysis and mitigation measures for the District are included by reference. The cultural resources section of the 2017 EIR (page 93) contains two new cultural resources CEQA checklist items that were not included in the 2016 EIR. Item d is the checklist item about disturbance of human remains and Item e is the new checklist item about Tribal Cultural Resources (AB 52). The response to Item d says that the PEP site has been graded in the past and there is no potential for human remains. The response for Tribal Cultural Resources (Item e) states that the PEP site has no established cultural tribal value. It is then stated that the PEP has No Impact on Items 5 (d, e). This is true for Item d (human remains), but is unknown for Item e (Tribal Cultural Resources). The statement that the PEP site has no established cultural tribal value is apparently based on Native American consultation conducted in 2014 and reported in the 2016 EIR. However, to properly address Item e, there must be evidence of compliance with AB 52, a formal consultation process requiring notification to Native American tribes who have requested consultation under AB 52. The purpose of the AB 52 consultation process is to identify Tribal Cultural Resources that could be impacted by the project. AB 52 consultation is required for all CEQA documents for which a notice of preparation (NOP) is filed for an ND, MND, or an EIR after July 1, 2015. Since the NOP for the 2017 EIR was filed in April 2016 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. It is possible that no tribes requested consultation under AB 52, but if this is the case, this must be stated in the EIR.

In Unavoidable Adverse Impacts on page 105, it says that Hilmer Lodge Stadium, the Gymnasium, and Buildings 27A – 27C are potentially eligible as historic resources in the California Register of Historic Resources. This should be revised to say Hilmer Lodge Stadium, the Gymnasium, and Buildings 27A – 27C are eligible as historical resources in the California Register of Historical Resources. The buildings were determined eligible when the 2016 EIR was certified (no longer potentially eligible; they are now eligible). Also, historic resources should be changed to historical resources.

In the Alternatives Analysis (Section 7) Alternative 1 includes renovation of the Aquatic Center and renovation of Hilmer Lodge Stadium, rather than demolition. The Aquatic Center is a contributing element of the District and the Hilmer Lodge Stadium is individually eligible as well as a contributing element of the District. Renovation of the Hilmer Lodge Stadium apparently cannot be done using the Secretary of the Interior's Standards for Rehabilitation because it is stated that Alternative 1 would still result in a significant adverse impact to Hilmer Lodge Stadium. Renovation of the Aquatic Center would result in less impacts to a Historical Resource (the Aquatic Center), but it is not stated whether these impacts would still be significant. The Alternatives Analysis notes that a Statement of Overriding Considerations (SOC) would be required for all alternatives except the no-project alternative.

Ms. Barbara Liebold
Page 4 of 4

If you have any questions regarding this review, please contact me at (714) 648-0630 or rmason@ecorpconsulting.com.

Sincerely,

ECORP Consulting, Inc.

A handwritten signature in black ink that reads "Roger D. Mason". The signature is written in a cursive style with a large, prominent "R" and "M".

Roger D. Mason, Ph.D., RPA
Director of Cultural Resources

Cc: Tom Holm

ATTACHMENT G

Biological Resources Review (ECORP)



June 28, 2017
(2017-140)

Barbara Liebold, City Attorney
c/o Liebold McClendon & Mann
9841 Irvine Center Drive
Irvine, CA 92618

Subject: CONFIDENTIAL AND PRIVILEGED INFORMATION -- Review of Biological Resources Technical Reports and Biological Resources Sections of Environmental Documents for Mount San Antonio College 2015 Facilities Master Plan and Physical Education Projects, Walnut, Los Angeles County, California

Dear Ms. Liebold:

I have reviewed the Biological Technical Report (April 14, 2016) and the biological resources EIR sections prepared for the Mount San Antonio College Master Plan Update and Physical Education Projects, Walnut, Los Angeles County. In the order in which they are discussed, the reviewed reports/sections are:

- Appendix G – Biological Resources, in 2015 Facilities Master Plan Update and Physical Education Projects: Draft Subsequent Program/Project EIR to Final Program EIR (SCH 2002041161), Appendices, Volume 2 of 2
- Biological Resources Sections 3.7.1 H, 3.7.2 H, 3.8.1 H, 3.8.2 H, 3.9, 3.10, 3.11, 3.12, 3.13, and 5.5 in 2015 Facilities Master Plan Update and Physical Education Projects: Draft Subsequent Program/Project EIR to Final Program EIR (SCH 2002041161) (2016), Volume 1 of 2
- Biological Resources Mitigation Measures in Appendices G (2016) and H (2017) in Physical Education Project (Phase 1, 2) Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR (SCH 2002041161), Volume 2
- Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR (SCH 2002041161): Physical Education Project (Phase 1, 2) (2017)

The review does not include several documents which are referred to within the EIR, including previous technical studies from 2008 and 2012, or permits issued for previous projects by state or federal agencies. Below is a discussion of the materials reviewed, by report/section.

Additionally, it should be noted that the above documents no longer reflect the existing conditions at the site. The stadium has been demolished and significant grading has occurred, which have changed biological conditions on the site. The SEIR should be revised to reflect the actual conditions on the site.

Appendix G is the Biological Technical Report for the Mount San Antonio College (SAC) 2015 Facilities Master Plan Update.

This report was based upon a field survey conducted during March 2016 and review of the biological findings in previous analyses of the 2008 and 2012 Master Plan Updates. The biological field work conducted served to update the vegetation mapping, provide general zoological and botanical surveys, and to provide a protocol burrowing owl habitat assessment and burrow survey.

According to the results of this study, there were four native or "naturalized" vegetation communities present that were mostly associated with the southern half of the property. These communities were mule fat scrub, California walnut woodland, non-native grassland, and Venturan coastal sage scrub. Other areas mapped included extensive agriculture, non-native vegetation, disturbed habitat and developed areas. Vegetation community mapping followed Holland (1986). For the most part I agree with the vegetation mapping, however this area is not known to be within the typical range of the Venturan association of coastal sage scrub. Notable vegetative elements of Venturan coastal sage scrub recorded by Holland (1986), such as purple sage (*Salvia leucophylla*), are absent and the site is located within the range where the Riversidean sub-association is more to be expected. Further, although the description of this plant community within the report is accurate, the plant list of what was actually observed does not contain most of the species described. This, however, is a minor discrepancy that would not affect the findings.

There is only a single mention of jurisdictional resources, including those regulated by the U.S. Army Corps (USACE), within the document, under the section describing the mule fat scrub. The report does not include a method for the evaluation of areas regulated by the USACE. The conclusion is that there is no USACE jurisdiction present based on the landscape position of the mule fat scrub. For the mule fat scrub located within a clear upland area, this conclusion seems reasonable. For the mule fat scrub within the stormwater facility/detention basin, no evaluation of vegetative, soil or hydrologic characteristics was included as is customary in following the USACE guidelines for evaluating wetlands in such a location. It is also possible for wetlands to be isolated, occurring outside of a lake or stream. Further, some artificial features can function like a stream and be thus considered jurisdictional by the state. Although I concur that a wetland or jurisdictional feature seems unlikely at this location, for the reasons stated, I would prefer more data upon which to base the conclusion.

I concur with the conclusions based on the evaluation of common plant and wildlife species that could be present on this property, the evaluation of potentially-occurring sensitive plant species, and the evaluation of potentially-occurring sensitive animal species. However, there are several of the individual potential-to-occur conclusions for sensitive plant species (Table 2) that are errant. For instance, slender-horned spinyflower (*Dodecahema leptoceras*) is given a "low" designation when it should be "none" because suitable habitat (Riversidean alluvial fan sage scrub) is not present. Nevin's barberry (*Berberis nevinii*) should also be "none" because, as the report concludes, this plant would have been observed if present. Many of the conclusions provided are similarly listed as "low" when they probably should be "none" because of lack of habitat or other factors.

Sensitive animal species that were previously observed in or near the study area include coastal California gnatcatcher (*Polioptila californica californica*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and least Bell's vireo (*Vireo bellii pusillus*). The report concludes that sage scrub on site could be potentially occupied by the gnatcatcher and cactus wren but that the least Bell's vireo is likely absent from the site. I concur with these findings. The potential-to-occur conclusions (Table 3) seem accurate to me, except for the conclusion of "low" for the coast range newt (*Taricha torosa*). This species is only found within larger, interconnected riparian systems with nearly perennial flows and should be "not expected" for this site.

Appendix E of the report contains a burrowing owl habitat assessment and burrow survey report. I reviewed this report and the survey methods, results, and conclusions are accurate and logical in my opinion and they meet the evaluation standard currently accepted for this species.

The report correctly identifies sensitive riparian habitat (mule fat scrub), the sage scrub, and the California walnut woodland. However, I do not concur that non-native grassland should be considered a sensitive habitat under CEQA, as is stated in the report. Non-native grassland has been listed by some local jurisdictions elsewhere as a sensitive habitat, but not by the State of California, Los Angeles County or the City of Walnut. In the context of this site and its known resources, the non-native grassland plant community would not be considered sensitive.

The Regional and Regulatory Context section of the report provides an overview of federal and state regulatory frameworks applicable to the project and a discussion of wildlife corridors. The report correctly summarizes the federal and state regulatory framework. The wildlife corridor discussion correctly describes the understood functions of wildlife corridors and their use by animal species. The conclusion is that, due to topographic and other physical factors, no portions of the site are expected to function as wildlife corridors. While this is true for larger and less urban-adapted animals, such as mountain lion (*Felis concolor*), it is not true for more urban-associated animals such as the coyote (*Canis latrans*) and opossum (*Didelphius virginiana*) and several common bird species.

Within the impact section of the document, there is a discussion of the thresholds of significance, a discussion of the direct impacts of the project, and a discussion of the indirect impacts of the project. The significance thresholds correctly summarize those found within CEQA. Within the direct and indirect impact sections, I concur with the findings. The mitigation section of the report identifies mitigation measures for direct impacts to individual California black walnut trees and nesting birds/raptors, while also addressing indirect impacts due to the potential spread of non-native plant species, night lighting of the campus, and errant construction activities. The report concludes that implementation of the aforementioned mitigation measures will reduce all project impacts to below a level of significance. These mitigation measures are appropriate and the final conclusion is accurate.

Biological resources sections of the 2016 EIR

The biological sections reflect the same information as is found within the Technical Appendix G, Biological Technical Report. There are minor spelling errors (top of page 300, it refers to the 20154 FMPU and PEP), but otherwise the sections are well written and follow the CEQA Guidelines for biological resources. The impacts analysis from Appendix G is correctly repeated and the mitigation measures recommended in Appendix G are now required in the EIR.

Biological Resources Mitigation Measures in Appendices G (2016) and H (2017) in Physical Education Project (Phase 1, 2) Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR (SCH 2002041161), Volume 2

The mitigation measures contained within the 2016 EIR are repeated in the Biological Resources Mitigation Measures in Appendices G (2016) and H (2017).

Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR (SCH 2002041161): Physical Education Project (Phase 1, 2) (2017)

The 2017 PEP EIR incorporates the 2016 EIR by reference. Thus, the same impacts analysis and mitigation measures for the District are included by reference. The biological resources section of the 2017 EIR (page 92) contains one new biological resources CEQA checklist item that was not included in the 2016 EIR. Item c is the checklist item about substantially adverse effects on federal wetlands under the Clean Water Act Section 404. The response to Item c says that there are no federal wetlands or Section 404 resources located on the PEP site, a conclusion that is supported by the conclusions found within the Biological Technical Report included within the 2016 EIR (Appendix G).

If you have any questions regarding this review, please contact me at (909) 307-0046 or staylor@ecorpconsulting.com.

Sincerely,

ECORP Consulting, Inc.



Scott I. Taylor
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Cc: Tom Holm