



CITY OF WALNUT

February 16, 2016,

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

SUBJECT: Notice of Preparation (NOP) of a Draft Subsequent Project and Program EIR for the Mt. San Antonio College (Mt. SAC) 2015 Facilities Master Plan and Physical Education Projects

Dear Ms. Klein,

This letter is the City of Walnut's response to the Mt. SAC's NOP for the Draft Subsequent Project and Program EIR (SEIR) for the 2015 Facilities Master Plan and Physical Education Projects. The City concurs that these significant projects require the preparation of a full SEIR to analyze their potentially significant and wide-ranging environmental impacts. Please send all notices and documents relating to the SEIR for the 2015 Facilities Master Plan and Physical Education Projects to the City of Walnut, Attention Tom Weiner, Community Development Director with a copy to Justin Carlson, City Planner.

Due to the fact that an Initial Study was not included, the City of Walnut would like the following specific details included within the SEIR analysis for the following projects identified in the circulated NOP:

- **Physical Education Projects**
- **Relocation of the Public Transportation Center (to Lot D3)**
- **Construction of a Pedestrian Bridge across Temple Avenue (connecting the Physical Education Complex to the existing Lot F)**
- **An expanded Wildlife Sanctuary and Open Space**
- **The Net Increase in Square-Footage (i.e. construction & demolition) at 2105 FMPU Buildout is Approximately 500,000 Gross Square-Feet**

PHYSICAL EDUCATION PROJECTS:

As indicated in the NOP, the major changes from the 2012 Facilities Master Plan (FMP) is the re-design of the athletic facilities south of Temple Avenue and east of Bonita Avenue (previously the athletics projects were named the Athletics Complex East (Phase 1) and Physical Education

Complex (Phase 2). Therefore, the Physical Education Projects (Phases 1, 2) as identified in Exhibit 3 of the NOP (circulated January 15, 2016) should include:

1. **Transportation/Traffic & Parking:** Close attention should be paid to the traffic impacts likely to be generated by the proposed project both during construction and upon completion of the proposed project and on the demand for parking spaces. A Traffic Impact Analysis (TIA) needs to include an analysis of potential traffic impacts upon road segments within the City and at key intersections, including but not limited to:
 - Temple Avenue at Bonita Avenue.
 - Temple Avenue/Amar Road at Grand Avenue.
 - Grand Avenue at Mountaineer Road.
 - Grand Avenue at San Jose Hills Road.
 - Mountaineer Road at Edinger Way.

The TIA needs to address the proposed use of identified haul routes for the import or export of construction materials and the potential traffic related impacts resulting from the construction of applicable off-site improvements for the project located within public right-of-ways. Haul route analysis should take into account City adopted weight limits, permissible hours of construction and hauling activities and other applicable restrictions.

Also, the NOP indicates that the District is looking at using the location for special events as well as the requested application to host the 8-day 2020 Olympic Track & Field trials. The College projects a maximum daily attendance of 20,000 attendees at these events. The SEIR needs to analyze traffic and increased congestion as well as the increased demand for parking spaces based on projected daily use as well as the peak demands generated by the projected attendance spikes at the proposed special events.

2. **Aesthetics:** Due to existing surrounding residential uses to the project site and the proposed uses, the SEIR needs to analyze the potential impacts of substantial light and/or glare as well as daytime and nighttime views. The light issues include without limitation reflections, glare, decreased night sky visibility and building shadow.
3. **Air Quality:** The impacts on air quality both during and after construction of the proposed Physical Education Projects should be properly analyzed. Sensitive populations are more susceptible to the effects of air pollution than are the general population (i.e., children, senior citizens, and acutely or chronically ill people). Land uses considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. Implementation of the proposed project is anticipated to generate increased vehicle trips on area roadways that could result in increased air pollutants. Construction and operation of the proposed project would increase vehicle trips on area roadways and result in associated air pollutants. Grading and excavation operations may also have air quality impacts in the absence of mitigation.

Furthermore, the proposed project could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. Development and site improvements associated with the proposed project could result in the addition of new

indirect, mobile, and stationary source emissions. Therefore, further analysis in the SEIR is required to determine the significance of potential impacts as it relates to project air quality.

4. **Cultural Resources**: The SEIR needs to include a Cultural Resources analysis to ensure that all CEQA regulations be followed as it relates to the protection of cultural resources and the potential impacts that the project may have.
5. **Geology & Soils**: The SEIR should analyze geologic, geohazards, and environmental health hazards information for the project in order to identify, if any, geological impacts that are likely to result from project construction and implementation.
6. **Greenhouse Gas Emissions**: Greenhouse gas emissions (both direct and indirect) need to address the potential emissions from construction activities, proposed use of the project, as well as mobile and electrical consumption sources.
7. **Hazards and Hazardous Materials**: The project proposes the re-design of the athletic facilities (south of Temple Avenue and east of Bonita Avenue) and therefore, the SEIR needs to address potential hazard and/or hazardous materials related to the demolition and construction of the project.
8. **Hydrology and Water Quality**: The SEIR needs to analyze the effects the proposed project will have on hydrology and water quality as it relates to impacts resulting from work completed during the construction phase, following the completion of construction and prior to the establishment of ground cover. Additionally, the SEIR should analyze effects immediately after the completion of the proposed project when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.
9. **Land Use and Planning**: The City of Walnut Zoning Map designates the project site as R.P.D. - 61,700 – 0.6 DU. The SEIR is required to determine whether project implementation would conflict with any applicable land use plan, policy, and/or regulation. The College must consult with the City of Walnut as a Responsible Agency for any and all necessary permits, including without limitation, grading, hauling, and conditional use permits required in accordance with applicable zoning.
10. **Noise**: A Noise Impact Study needs to address both the short term and long term impacts of the project, including projected average daily use and noise impacts of high intensity special events. The analysis also needs to address the impact that any constructed-related noise will have on adjacent properties.
11. **Public Services**: The SEIR needs to address both the short term and long term impacts of the project as it relates to increase demand for police and/or fire department services as well as other public facilities (e.g. sewer, storm drains, and roadways).
12. **Utilities and Service Systems**: The SEIR needs to address the short term and long term effects the project will have on utility and service systems in terms of construction and ongoing project operations.

13. **Cumulative Impacts:** The SEIR needs to address the cumulative short term and long term effects of the project and determine the significance of potential impacts.
14. **Impacts of Phased Project Construction Upon Earlier Phases:** The SEIR should properly analyze project phasing and staging of construction. The City of Walnut recommends that the SEIR include an analysis of the potential air quality, noise impacts, and traffic impacts that the construction of any later phases will have in regards to previously constructed phases of the project.
15. **Biological Resources:** The SEIR needs to address the short term and long term effects the project will have on biological resources and should include a thorough study and biological evaluation of sensitive habitat existing on and near the project site and potential disturbances during and after construction.
16. **Project Alternatives:** The SEIR must include a fair and unbiased consideration of various project alternatives, including alternative sites, alternative scale/scope and a no-project alternative.

RELOCATION OF THE PUBLIC TRANSPORTATION CENTER (TO LOT D3)

As indicated in the NOP, the 2015 Mt. SAC Facilities Master Plan Update (FMPU) includes the proposed relocation of the Public Transportation Center (PTC) to (Lot D3) on the north side of Temple Avenue. The SEIR as it relates to the relocated PTC needs to include:

1. **Transportation/Traffic & Parking:** Close attention should be paid to the traffic impacts likely to be generated by the proposed project both during construction and upon completion of the proposed project and on the demand for parking spaces. A Traffic Impact Analysis (TIA) needs to include an analysis of potential traffic impacts upon road segments within the City and at key intersections, including but not limited to:
 - Temple Avenue at Bonita Avenue.
 - Temple Avenue/Amar Road at Grand Avenue.
 - Grand Avenue at Mountaineer Road.
 - Grand Avenue at San Jose Hills Road.
 - Mountaineer Road at Edinger Way.

The TIA needs to address the proposed use of identified haul routes for the import or export of construction materials and the potential traffic related impacts resulting from the construction of any applicable off-site improvements for the project located within public right-of-ways. Haul route analysis should take into account City adopted weight limits, permissible hours of construction and hauling activities and other applicable restrictions.

2. **Air Quality:** The impacts on air quality both during and after construction of the proposed Physical Education Projects should be properly analyzed. Sensitive populations are more susceptible to the effects of air pollution than are the general population (i.e., children, senior citizens, and acutely or chronically ill people). Land uses considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. Implementation of the proposed

project is anticipated to generate increased vehicle trips on area roadways that could result in increased air pollutants. Construction and operation of the proposed project would increase vehicle trips on area roadways and result in associated air pollutants. Grading and excavation operations may also have air quality impacts in the absence of mitigation.

Furthermore, the proposed project could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. Development and site improvements associated with the proposed project could result in the addition of new indirect, mobile, and stationary source emissions. Therefore, further analysis in the EIR is required to determine the significance of potential impacts as it relates to project air quality.

3. **Geology & Soils**: The SEIR should analyze geologic, geohazards, and environmental health hazards information for the project in order to identify, if any, geological impacts that are likely to result from project construction and implementation.
4. **Greenhouse Gas Emissions**: Greenhouse gas emissions (both direct and indirect) need to address the potential emissions construction activities, proposed use of the project, as well as mobile and electrical consumption sources.
5. **Hazards and Hazardous Materials**: The SEIR needs to address potential hazard and/or hazardous materials related to the construction of the project.
6. **Hydrology and Water Quality**: The SEIR needs to analyze the effects the proposed project will have on hydrology and water quality as it relates to impacts resulting from work completed during the construction phase, following the completion of construction and prior to the establishment of ground cover (if any). Additionally, the SEIR should analyze effects immediately after the completion of the proposed project when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.
7. **Land Use and Planning**: The City of Walnut Zoning Map designates the project site as R.P.D. - 61,700 – 0.6 DU. The SEIR is required to determine whether project implementation would conflict with any applicable land use plan, policy, and/or regulation. The College must consult with the City of Walnut as a Responsible Agency for any and all necessary permits, including without limitation, grading, hauling, and conditional use permits required in accordance with applicable zoning.
8. **Noise**: A Noise Impact Study needs to address the short term and long term impacts of the project. The analysis also needs to address the impact that constructed-related noise will have on adjacent properties.
9. **Public Services**: The SEIR needs to address both the short term and long term impacts of the project as it relates to increase demand for police and/or fire department services as well as other public facilities (e.g. sewer, storm drains, and roadways).

- 10. Utilities and Service Systems:** The SEIR needs to address the short term and long term effects the project will have on utility and service systems in terms of construction and ongoing project operations.
- 11. Cumulative Impacts:** The SEIR needs to address the cumulative short term and long term effects of the project and determine the significant of potential impacts.
- 12. Impacts of Phased Project Construction Upon Earlier Phases:** The SEIR should properly analyze project phasing and staging of construction. The City of Walnut recommends that the SEIR include an analysis of the potential air quality, noise impacts, and traffic impacts that the construction of any later phases will have in regards to previously constructed phases of the project.
- 13. Project Alternatives:** The SEIR must include a fair and unbiased consideration of various project alternatives, including alternative sites, alternative scale/scope and a no-project alternative.

**CONSTRUCTION OF A PEDESTRIAN BRIDGE ACROSS TEMPLE AVENUE
(CONNECTING THE PHYSICAL EDUCATION COMPLEX TO THE EXISTING
LOT F)**

As indicated in the NOP, Mt. SAC is proposing the construction of a pedestrian bridge across Temple Avenue which will connect the Physical Education Complex to Lot F (NOP, Exhibit 3 Mt. SAC Land Use Plan). The SEIR as it relates to the pedestrian bridge should include:

- 1. Transportation/Traffic:** Close attention should be paid to the vehicular and pedestrian traffic impacts likely to be generated by the proposed project both during construction and upon completion of the proposed project. Traffic Impact Analysis (TIA) needs to include an analysis of potential construction related traffic impacts on Temple Avenue. The TIA needs to address the proposed use of identified haul routes for the import or export of construction materials and the potential traffic related impacts resulting from the construction of applicable off-site improvements for the project located within public right-of-ways. Haul route analysis should take into account City adopted weight limits, permissible hours of construction and hauling activities and other applicable restrictions.
- 2. Air Quality:** The impacts on air quality both during and after construction of the proposed Physical Education Projects should be properly analyzed. Sensitive populations are more susceptible to the effects of air pollution than are the general population (i.e., children, senior citizens, and acutely or chronically ill people). Land uses considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. Implementation of the proposed project is anticipated to generate increased vehicle trips on area roadways that could result in increased air pollutants. Construction of the proposed project would increase vehicle trips on area roadways and result in associated air pollutants. Grading and excavation operations may also have air quality impacts in the absence of mitigation.

Furthermore, the proposed construction of the project could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality

standard. Development and site improvements associated with the proposed project could result in the addition of new indirect, mobile, and stationary source emissions. Therefore, further analysis in the EIR is required to determine the significance of potential impacts as it relates to project air quality.

3. **Greenhouse Gas Emissions**: Greenhouse gas emissions (both direct and indirect) need to be addressed the potential emissions construction activities, proposed use of the project, as well as mobile and electrical consumption sources.
4. **Land Use and Planning**: The City of Walnut Zoning Map designates the project site as R.P.D. - 61,700 – 0.6 DU. The SEIR is required to determine whether project implementation would conflict with any applicable land use plan, policy, and/or regulation. The College must consult with the City of Walnut as a Responsible Agency for any and all necessary permits, including without limitation, grading, hauling, and conditional use permits required in accordance with applicable zoning.
5. **Noise**: A Noise Impact Study needs to address both the potential short term and long term impacts of the project. The analysis also needs to address the impact that constructed-related noise will have on the surrounding area.
6. **Utilities and Service Systems**: The SEIR needs to address the short term and long term effects the project will have on utility and service systems in terms of construction and ongoing project operations.
7. **Cumulative Impacts**: The SEIR needs to address the cumulative short term and long term effects of the project and determine the significant of potential impacts.
8. **Impacts of Phased Project Construction Upon Earlier Phases**: The SEIR should properly analyze project phasing and staging of construction. The City of Walnut recommends that the SEIR include an analysis of the potential air quality, noise impacts, and traffic impacts that the construction of any later phases will have in regards to previously constructed phases of the project.
9. **Project Alternatives**: The SEIR must include a fair and unbiased consideration of various project alternatives, including alternative sites, alternative scale/scope and a no-project alternative.

AN EXPANDED WILDLIFE SANCTUARY AND OPEN SPACE

As indicated in the NOP, Mt. SAC is proposing an expanded wildlife sanctuary and open space. The SEIR as it relates to the expanded wildlife sanctuary and open space should include:

1. **Land Use and Planning**: The City of Walnut Zoning Map designates the project site as R.P.D. - 61,700 – 0.6 DU. The SEIR is required to determine whether project implementation would conflict with any applicable land use plan, policy, and/or regulation. The College must consult with the City of Walnut as a Responsible Agency for any and all necessary permits, including without limitation, grading, hauling, and conditional use permits required in accordance with applicable zoning.

2. **Biological Resources**: The SEIR needs to address the short term and long term effects the project will have on biological resources and should include a thorough study and biological evaluation of sensitive habitat existing on and near the project site and potential disturbances during and after project implementation.
3. **Cultural Resources**: The project area is predominately urbanized and it is unknown that cultural and/or paleontological resources are known to occur on-site. Therefore, further analysis in the SEIR is required to determine significance of potential impacts.
4. **Hydrology and Water Quality**: The SEIR needs to analyze the effects the proposed project will have on hydrology and water quality as it relates to impacts resulting from work completed during the construction phase, following the completion of construction and prior to the establishment of ground cover. Additionally, the SEIR should analyze effects immediately after the completion of the proposed project when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.
5. **Geology & Soils**: The SEIR should analyze geologic, geohazards, and environmental health hazards information for the project in order to identify, if any, geological impacts that are likely to result from project construction and implementation.
6. **Project Alternatives**: The SEIR must include a fair and unbiased consideration of various project alternatives, including alternative sites, alternative scale/scope and a no-project alternative. Specifically, the SEIR should consider expanding the wildlife area and open space sanctuary to include the West Parcel which is documented as supporting high quality habitat for list species.

THE NET INCREASE IN SQUARE-FOOTAGE (I.E. CONSTRUCTION & DEMOLITION) AT 2105 FMPU BUILDOUT IS APPROXIMATELY 500,000 GROSS SQUARE-FEET:

As indicated in the NOP, the net increase in square-footage (i.e. construction & demolition) at 2105 FMPU buildout of approximately 500,000 Gross Square-Feet should include:

1. **Transportation/Traffic & Parking**: Close attention should be paid to the traffic impacts likely to be generated by the proposed project both during construction and upon completion of the proposed project and on the demand for parking spaces. A Traffic Impact Analysis (TIA) needs to include an cumulative analysis of potential traffic impacts upon road segments within the City and at key intersections, including but not limited to:
 - Temple Avenue at Bonita Avenue.
 - Temple Avenue/Amar Road at Grand Avenue.
 - Grand Avenue at Mountaineer Road.
 - Grand Avenue at San Jose Hills Road.
 - Mountaineer Road at Edinger Way.

Additionally, the TIA needs to cumulatively address the proposed use of identified haul routes for the import or export of construction materials and the potential traffic related

impacts resulting from the construction of applicable off-site improvements for the project located within public right-of-ways. Haul route analysis should take into account City adopted weight limits, permissible hours of construction and hauling activities and other applicable restrictions.

2. **Aesthetics**: The SEIR needs to analyze the cumulative potential impacts of substantial light and/or glare as well as daytime and nighttime views. The light issues include without limitation reflections, glare, decreased night sky visibility and building shadow.
3. **Air Quality**: The impacts on air quality both during and after construction of the proposed Physical Education Projects should be properly analyzed. The proposed projects could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. Development and site improvements associated with the proposed project could result in the addition of new indirect, mobile, and stationary source emissions. Therefore, further analysis in the EIR is required to determine the significance of cumulative potential impacts as it relates to project air quality.
4. **Cultural Resources**: The SEIR needs to include a cumulative Cultural Resources analysis to ensure that all CEQA regulations be followed as it relates to the protection of cultural resources and the potential impacts that the project may have.
5. **Geology & Soils**: The SEIR should analyze geologic, geohazards, and environmental health hazards information for the project in order to identify, if any, geological impacts that are likely to result from project construction and implementation.
6. **Greenhouse Gas Emissions**: Greenhouse gas emissions (both direct and indirect) need to be cumulatively addressed the potential emissions construction activities, proposed use of the project, as well as mobile and electrical consumption sources.
7. **Hazards and Hazardous Materials**: The SEIR needs to cumulatively address potential hazards and/or hazardous materials related to the demolition and construction of all projects.
8. **Hydrology and Water Quality**: The SEIR needs to analyze the cumulative effects the proposed project will have on hydrology and water quality as it relates to impacts resulting from work completed during the construction phase, following the completion of construction and prior to the establishment of ground cover. Additionally, the SEIR should analyze effects immediately after the completion of the proposed project when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.
9. **Noise**: A Noise Impact Study needs to address both the short term and long term cumulative impacts of the projects. The analysis also needs to address the impacts that constructed-related noise will have on adjacent properties on all phases of the project.
10. **Public Services**: The SEIR needs to cumulatively address the short term and long term impacts of the project as it relates to increase demand for police and/or fire department services as well as other public facilities (e.g. sewer, storm drains, and roadways).

11. **Utilities and Service Systems**: The SEIR needs to address the short term and long term cumulative effects the projects will have on utility and service systems in terms of construction and ongoing project operations.
12. **Cumulative Impacts**: The SEIR needs to address the cumulative short term and long term effects of the overall project and determine the significant of potential impacts as it relates to the 2015 FMPU buildout.
10. **Impacts of Phased Project Construction Upon Earlier Phases**: The SEIR should properly analyze project phasing and staging of construction. The City of Walnut recommends that the SEIR include an analysis of the potential air quality, noise impacts, and traffic impacts that the construction of any later phases will have in regards to previously constructed phases of the project.
11. **Project Alternatives**: The SEIR must include a fair and unbiased consideration of various project alternatives, including alternative sites, alternative scale/scope and a no-project alternative.

Thank you again for providing the City of Walnut with the opportunity to comment on the NOP for this project. Please forward a copy of the SEIR to my attention at the City of Walnut upon completion. If you have any questions or require information for inclusion in the SEIR, please feel free to contact Community Development Director Tom Weiner or me at (909) 595-7543.

Sincerely,



Justin Carlson,
City Planner

Cc. City Manager
City Attorney
Community Development Director