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

CITY OF WALNUT

August 25, 2016

Gary Nellesen, Director, Facilities Planning & Management
Mt. San Antonio Community College District
1100 North Grand Avenue
Walnut, CA 91789-5611
facilitiesplanning@mtsac.edu
(909) 274-4850

VIA E-MAIL and U.S. MAIL

Re: *Comments to the Mt. San Antonio College 2015 Facilities Master Plan Update and Physical Education Projects Draft Subsequent Program/Project EIR (SCH 2002041161) Traffic Impact Study Technical Appendices A, B, C and D to Appendix B.1*

Dear Mr. Nellesen,

On behalf of the City of Walnut (the "City"), we appreciate this opportunity to review and provide comments to the District's circulation of the Traffic Impact Study Technical Appendices A, B, C, and D (the "Technical Appendices") to Appendix B.1 to the 2015 Facilities Master Plan Update and Physical Education Projects (the "Project") Draft Subsequent Program and Project Environmental Impact Report, State Clearinghouse No. 2002041161 (the "DEIR").

The DEIR was circulated for a 45-day review period that began June 13, 2016 and ended July 28, 2016. As noted by the City's traffic consultant Kunzman Associates, Inc. in Exhibit B to the City of Walnut comment letter submitted July 28, 2016,

"The Traffic Impact Study appendices only contain partial information as provided in the 2015 Facilities Master Plan Update and Physical Education Projects, Appendices – Volume 2 of 2 (June 2016). The complete set of appendices for the Traffic Impact Study should be included in the publicly available documentation."

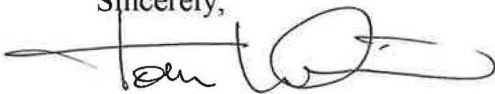
The District is now circulating the previously-omitted Technical Appendices for public review and comment for a period of 21 days ending September 9, 2016. Kunzman Associates, Inc. has reviewed the Technical Appendices and provided comments in the letter attached hereto as Exhibit A. The City now submits and incorporates that letter as part of these comments.

Although the City will not restate the entirety of the attached comment letter here, a few important points should be called to the District's attention. First, certain of the Traffic Impact Study's Level of Service ("LOS") calculations were based upon incorrect reporting and measurements. Second, the LOS calculations for all non-freeway ramp intersections should be revised to conform with the Los Angeles County Traffic Impact Analysis Report Guidelines. Lastly, Intersections #12 and #13 are mislabeled and switched in several sections of the Technical Appendices, which necessitates correction throughout the Technical Appendices and the Traffic Impact Study.

As the attached comment letter concludes, the necessary revisions to the LOS Calculations contained within the Technical Appendices have the potential to alter the DEIR's findings of significance regarding the Project's impacts. Therefore, the Traffic Impact Study should be revised to ensure the District's findings are accurate. California courts have repeatedly stated that "[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal. App.3d 185, 192-93.) The City urges the District to implement the changes requested herein and revise the DEIR as necessary.

Thank you for your consideration of these comments.

Sincerely,



Tom Weiner
Community Development Director
City of Walnut

Attachments:

Exhibit A: Kunzman Associates, Inc. comment letter to the Traffic Impact Study
Technical Appendices A, B, C, and D to Appendix B.1 to the Mt. SAC 2015 Facilities
Master Plan Update

cc: Mayor Ching and City Council Members
City Manager Wishner
City Attorney Leibold
City Clerk DeDios



KUNZMAN ASSOCIATES, INC.

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August 22, 2016

Mr. Justin Carlson, City Planner
CITY OF WALNUT
21201 La Puente Road
Walnut, CA 91789

Dear Mr. Carlson:

INTRODUCTION

The firm of Kunzman Associates, Inc. is pleased to provide this letter summarizing our peer review of the Traffic Impact Study Technical Appendices A, B, C, and D to Appendix B.1 to the Mt. SAC 2015 Facilities Master Plan Update project in the City of Walnut. Our initial review comments noted that these appendices were referred to, but not included, in Appendix B.1 to the Draft EIR. Based on the review of Technical Appendices A, B, C, and D, we offer the following comments:

COMMENT 1

Appendix B - LOS Calculation Sheets: The morning peak hour volume-to-capacity (V/C) ratio at Intersection #11 (Grand Avenue/Baker Parkway) is incorrectly reported in the peak hour Level of Service tables for each analysis scenario based on the LOS (Level of Service) calculation worksheets contained in Appendix B.

COMMENT 2

Appendix B - LOS Calculation Sheets: All non-freeway ramp intersection Level of Service calculations should be revised to utilize a 10-percent yellow clearance (i.e., loss time of 10 seconds) and a maximum lane capacity of 2,880 vehicles per hour per lane for dual left-turn lanes, in accordance with the Los Angeles County Traffic Impact Analysis Report Guidelines.

COMMENT 3

Appendix B - LOS Calculation Sheets: Peak hour factors are typically not required for Intersection Capacity Utilization or volume-to-capacity calculations.

COMMENT 4

Appendix B - LOS Calculation Worksheets: The measured peak hour factor should be applied at Intersection #4 (Grand Avenue/I-10 EB Ramps) during the AM peak hour since this intersection is analyzed using the Highway Capacity Manual delay methodology.

Mr. Justin Carlson, City Planner
CITY OF WALNUT
August 22, 2016

COMMENT 5

Appendix B - LOS Calculation Worksheets: Intersections #12 and #13 are mislabeled; Intersection #12 should be Grand Avenue/SR-60 WB Ramps and Intersection #13 should be Grand Avenue/SR-60 EB Ramps.

COMMENT 6

Appendix B - LOS Calculation Worksheets: Intersection #12 (Grand Avenue/SR-60 WB Ramps) incorrectly shows right-turn overlap signal phasing for the eastbound approach.

COMMENT 7

Appendix D – Fair Share Calculations: On the second page, an impact is incorrectly identified at Intersection #12 (Grand Avenue/SR-60 WB Ramps) during the AM peak hour instead of Intersection #13 (Grand Avenue/SR-60 EB Ramps). On the third page, Intersections #12 and #13 are switched; the fair share percentage at Intersection #13 (Grand Avenue/SR-60 EB Ramps) should be 8%. This should also be corrected in Table 18 of the report.

CONCLUSIONS

Revisions to the Level of Service calculations have the potential to alter the findings of significance. The Mt. SAC 2015 Facilities Master Plan Update & Physical Education Projects Traffic Impact Study (Iteris, April 2016) should be revised to ensure accuracy of the findings based on the comments provided.

It has been a pleasure to service 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.

Sincerely,

KUNZMAN ASSOCIATES, INC.



Giancarlo Ganddini, T.E.
Manager of Traffic Engineering

JN 6619



KUNZMAN ASSOCIATES, INC.



Carl Ballard, LEED GA
Principal