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Mt. San Antonio College

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STATEMENT OF FACTS AND FINDINGS

Mt. San Antonio College 2018 Educational and Facilities Master Plan

Final Environmental Impact Report

(SCH No. 2018091004)

May 30, 2019

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I. INTRODUCTION

A. Findings of Fact

The California Environmental Quality Act ("CEQA") (Public Resources Code, §§ 21000–21178) and the State CEQA Guidelines (14 CCR, §§ 15000–15387) require that the Lead Agency analyze and provide findings on a project's environmental impacts before approving the project. If a project will generate significant environmental effects that cannot be avoided or substantially lessened, then before approving the project, the Lead Agency must provide a Statement of Overriding Considerations documenting that the project's benefits outweigh its unavoidable adverse significant environmental effects.

Mt. San Antonio Community College District ("Mt. SAC" or "college) in its capacity as the CEQA Lead Agency, has prepared this Statement of Facts and Findings ("Findings") to comply with CEQA for the Mt. San Antonio College 2018 Educational and Facilities Master Plan ("2018 EFMP"). The determination that Mt. SAC is the "Lead Agency" is made in accordance with Sections 15051 and 15367 of the State CEQA Guidelines, which define the Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project. Further, preparation of the EIR is subject to Section 21080.09(d) of the California Public Resources Code, which requires that public higher education institutions consider the environmental impacts of academic and enrollment plans. Specifically, regarding Findings, State CEQA Guidelines Section 15091 establishes the following requirements:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" under Section 15091(a)(1) that would avoid or substantially lessen a project's significant environmental effects can include a variety of measures or actions, including but not limited to:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

Should significant and unavoidable impacts remain after changes or alterations are applied to the project, a Statement of Overriding Considerations ("Statement") must be prepared. The Statement provides the Lead Agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental effects. Regarding a Statement of Overriding Considerations, CEQA Guidelines Section 15093 provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region- wide or statewide environmental benefits, of a Project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a Project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the Lead Agency approves a project, which will result in the occurrence of significant effects which are identified in the FEIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the FEIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed, and considered the *The Final Environmental Impact Report For Mt. San Antonio College 2018 Educational And Facilities Master Plan (State Clearinghouse No. 2018091004* ("Final EIR"), as well as all other information in the record of proceedings on this matter, the following Findings of Fact ("Findings") are made, and a Statement of Overriding Considerations ("Statement") is adopted by Mt. SAC in its capacity as the CEQA Lead Agency. These Findings and Statement set forth the environmental basis for current and subsequent discretionary actions to be undertaken by Mt. SAC and responsible agencies for the implementation of the Project.

B. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation ("NOP") and all other public notices issued by Mt. SAC in conjunction with the Project;
- The Draft EIR for the Project;
- The Final EIR for the Project (SCH No. 2018091004);
- All documents, studies, EIRs or other materials incorporated by reference in the Draft EIR and Final EIR;
- All written comments submitted by the agencies, organizations, or members of the public during the public review comment period on the Draft EIR, including a list of all commenters;
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR;
- All written and verbal public testimony presented during a noticed public hearing for the Project at which such testimony was taken;
- Information provided in submissions of testimony from officials and Mt. SAC, the public, and other municipalities and agencies;
- The Mitigation Monitoring Program ("MMP");
- The Officials Actions and Resolutions adopted by Mt. SAC in connection with the Project, and all documents incorporated therein;
- Matters of common knowledge to Mt. SAC, including but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these Findings; and
- Any other relevant materials required to be in the record of proceedings by Public Resources Code § 21167.6(c).

C. Custodian and Location of Records

Each section of the Draft EIR, incorporated as part of the Final EIR, contains a list of the references used in the preparation of the environmental analysis. The documents and other materials that constitute the Record of Proceedings for the Mt. SAC approval of the Final EIR and actions related to the Project are located at Mt. SAC Facilities Planning and Management, Mt. San Antonio College, 1100 North Grand Avenue, Walnut, California 91789–1399. Mt. SAC Facilities Planning and Management is the custodian of the Record of Proceedings for the Project. Copies of the documents and other materials that constitute the Record of Proceedings, are and at all relevant times have been and will be available upon request directed to the offices of Mt. SAC Facilities Planning and Management. These Findings provide this information in compliance with California Public Resources Code Section 21081.6(a)(2) and State CEQA Guidelines Section 15091(e).

II. PROJECT SUMMARY

A. Project Location

The Mt. San Antonio College ("Mt. SAC" or "college") campus is located in the southeastern part of Los Angeles County in the City of Walnut. The campus encompasses 418.44 acres (comprised of 3 parcels) and is located north and south of Temple Avenue east of Grand Avenue, with the "West Parcel" located west of Grand Avenue and south of Amar Road/Temple Avenue. Mountaineer Road and Edinger Way form the northern boundary of the campus and the eastern boundary is consistent with the City of Walnut's eastern boundary. The California State Polytechnic University ("Cal Poly") Pomona is located immediately east of the campus. The Mt. SAC campus is approximately 1.8 miles west of State Route (SR)-57, 1.0 mile south of Interstate (I)-10, and 0.9 mile north of SR-60.

B. Project Description

The 2018 EFMP involves facilities and site and infrastructure improvements anticipated to occur with implementation of the 2018 EFMP 10-year horizon period ("Phases 1A, 1B, and 2"). The Project components include Buildings/Facilities, Vehicular Circulation and Parking, Bicycle and Pedestrian Circulation, Open Space, Public Art, Wayfinding/Signage, Lighting, Natural Habitat and Urban Forest, Sustainable Practices/Energy, Utility Infrastructure and Construction Activities.

The 2018 EFMP identifies the framework for the uses and development of land on campus necessary to accommodate an identified level of enrollment and physical development. However, enrollment decisions and the actual implementation of specific capital projects are influenced by multiple factors, including funding decisions, demographics, and other factors external to the 2018 EFMP process. Thus, while the 2018 EFMP identifies the physical resources necessary to meet Mt. SAC's mission and its long-range development plans, it makes no commitments regarding the timing for achieving identified enrollment projections or implementing physical development. The current and proposed Mt. SAC Land Use Plans are shown on Exhibit 3-3 of the Final EIR. As shown, the proposed Mt. SAC Land Use Plan anticipates future development in six zones on campus: Primary Educational Zone, Athletics and Support Zone, Agricultural Zone, Wildlife Sanctuary/Open Space Zone, Land Management and Athletics Zone, and Agricultural/Sustainable Development Zone. These zones are further described in Section 4.10, Land Use and Planning, of the Final EIR.

Assumptions regarding the rate of growth and potential phasing of the proposed physical development are presented in Section 3.5.2, Growth Projections, of the Final EIR for planning and analysis purposes. In summary, the 2018 EFMP generally has a planning horizon of approximately 10 years (through 2027) and anticipates an increase in the unduplicated student headcount from 37,864 students in fall 2017 to between 40,802 and 42,745 students in fall 2027 (based on estimated medium and high growth rates). For analysis purposes, the phases and timeframes are assumed as Phase 1A—2019 to 2021, Phase 1B—2022 to 2025, and Phase 2—2025 to 2027.

As identified on Table 3-1, 2018 Educational and Facilities Master Plan Statistical Summary (Phases 1A, 1B, and 2) of the Final EIR, with implementation of the 2018 EFMP: 33 aged and/or temporary facilities (approximately 207,805 gsf of building space) would be removed/demolished; 13 new buildings (approximately 752,000 gsf), including 10 major buildings would be constructed; up to four parking structures would be constructed; and 9 buildings (405,023 gsf) would be

renovated. Therefore, should the 2018 EFMP be fully implemented, there would be approximately 2,474,053 gsf of building space on campus (including the previously approved Physical Education Project ["PEP"]). This represents a net increase of approximately 766,925 gsf compared to existing conditions when taking into consideration the PEP, and a net increase of approximately 544,195 gsf when considering the proposed development under Phases 1A, 1B, and 2 of the 2018 EFMP. The 2018 Facilities Master Plan is presented in Exhibit 3-4 of the Final EIR.

The 2018 EFMP identifies vehicular circulation, parking, and non-vehicular circulation improvements for the campus. The recommended approach for additional parking includes improving existing surface parking lots to increase capacity and circulation flow and building up to four new parking structures. The recommended approach to on-campus vehicular circulation keeps vehicles on the outer portions of campus, thus helping to separate pedestrian and vehicular circulation and reserve the academic core of campus for pedestrians. Improvements to campus vehicular circulation, emergency/service access, campus parking (surface and parking structures), bicycle circulation, and pedestrian circulation (including pedestrian bridges) are described in Sections 3.5.4 and 3.5.5 of the Final EIR.

In addition to the demolition and renovation of existing buildings, construction of new buildings, and parking and circulation components, implementation of the 2018 EFMP would include athletic facilities, enhanced open space areas and public art, implementation of an Urban Forest Initiative, infrastructure improvements, and utility infrastructure and roadway improvements at the Farm Precinct.

Further, as described in Section 3.5.8, Sustainability Practices/Energy of the Final EIR, the Mt. SAC Board of Trustees adopted the 2018 Climate Action Plan ("2018 CAP") to guide the campus towards becoming a more sustainable institution, and to prepare students to engage in finding solutions to the college's environmental challenges. The 2018 CAP articulates the vision, goals, and strategies which will move Mt. SAC to become a sustainable campus with net-zero carbon emissions and has been developed in coordination with campus stakeholders to ensure that it meets the various needs of the campus. In addition to compliance with applicable goals set forth in the 2018 CAP, Mt. SAC has committed to the sustainable strategies/practices during the 10-year planning period for the 2018 EFMP.

As discussed previously, certain projects in Phases 1A and 1B are being evaluated at a "project-specific level" as described in Section 3.0, Project Description of the Final EIR, and include development of the Student Center and Central Campus Infrastructure, Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, and Sand Volleyball Courts and Parking Lot W Reconstruction (Phase 1A); and Bookstore (Phase 1B). Impacts resulting from construction and operation of the 2018 EFMP as a long-range planning and development plan at a "program level" (Phases 1A, 1B, and 2), including components that were included in previous Facilities Master Plans but not yet implemented.

As further discussed in Section 2, Introduction of the Final EIR, it is not anticipated that Phase 3 components of the 2018 EFMP would be built during the 10-year horizon period; therefore, they are not being evaluated in the Final EIR. Implementation of Phase 3 components of the 2018 EFMP would be subject to separate environmental review pursuant to CEQA; however, they are considered in the cumulative impacts analysis in the Final EIR and are described in Section 4.0, Introduction to the Environmental Analyses, of the Final EIR.

C. Use of Environmental Impact Report

Mt. SAC is the Lead Agency which has the principal responsibility for carrying out or approving the project and, as such, is the Lead Agency for this Project under CEQA. The Lead Agency must identify, evaluate, and consider the potential environmental impacts of a project prior to taking any discretionary action on the project. The EIR is intended to provide information to the Lead Agency and other public agencies, the general public, and decision makers regarding the potential environmental impacts from the construction and operation of the proposed uses allowed by the 2018 EFMP.

The Final EIR is intended to serve as the primary environmental document for all future entitlements associated with implementation of the 2018 EFMP, including all discretionary approvals requested or required to implement the Project. The Final EIR analyzes the phased implementation of the 2018 EFMP as a long-range planning and development plan at a program-level (Phases 1A, 1B, and 2), including components that were included in previous Facilities Master Plans but not yet implemented. It should be noted that it is not anticipated that Phase 3 components of the 2018 EFMP would be built during the ten-year horizon period; therefore, with the exception of cumulative impacts, they are not being evaluated in the Final EIR. Subsequent actions implementing the 2018 EFMP will be reviewed as required by Section 21166 of the *California Public Resources Code* and Section 15162 of the State CEQA Guidelines. Section 15168 of the State CEQA Guidelines states:

> **15168. Program EIR**
>
> (a) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
>
> (1) Geographically,
>
> (2) As logical parts in the chain of contemplated actions,
>
> (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
>
> (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.
>
> (b) Advantages. Use of a program EIR can provide the following advantages. The program EIR can:
>
> (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
>
> (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
>
> (3) Avoid duplicative reconsideration of basic policy considerations,

(4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and

(5) Allow reduction in paperwork.

(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

(1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.

(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the Project covered by the program EIR, and no new environmental document would be required.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.

(4) Where the subsequent activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.

(5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the Project described in the program EIR, and no further environmental documents would be required.

The Final EIR has been prepared "with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences," as identified in Section 15151 of the State CEQA Guidelines. While detailed design information for all of the projects included in the 2018 EFMP is currently not available, sufficient information is available: (1) to identify specific development sites and associated potential physical impact areas and construction assumptions; (2) to identify the maximum amount of development anticipated with each individual project associated with the 2018 EFMP, as appropriate; and (3) to determine the size (e.g., square footage, height, and massing) of potential structures at each site, as necessary to accommodate the 2018 EFMP uses. This level of information is sufficient to allow for an analysis of the assumed build-out scenario on campus and at the individual development sites. Therefore, while this is a program-level EIR, the intent of the Final EIR is to provide sufficient detailed analysis such that future design approvals for individual projects are within the scope of the 2018 EFMP described and analyzed in the Final EIR. At the design approval stage, Mt. SAC will evaluate each individual project to determine whether it is within the scope of the program described and evaluated in the EIR and to determine what, if any, additional environmental documentation pursuant to CEQA is needed.

It should be noted that the Final EIR is specifically analyzing the construction and operation of the following projects implementing the 2018 EFMP at a project-specific level: Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, Student Center and Central Campus Infrastructure, Bookstore, and Sand Volleyball Courts and Parking Lot W Reconstruction. Pursuant to Section 15161 of the *State CEQA Guidelines*, a Project EIR examines the environmental impacts of a specific development project.

D. Statement of Objectives

Section 15124(b) of the State CEQA Guidelines indicates that an EIR must include "a statement of objectives sought by the Project". Following are the objectives established for the Project:

1. Provide an affordable local alternative to four-year universities for local students and returning veterans.
2. Implement the facilities, site improvement, and infrastructure needed to support the growth projected for instructional programs and support services at Mt. SAC.
3. Maximize functional space and eliminate non-functional space on campus, including removing and replacing temporary facilities with permanent facilities in a timely manner, and renovating or replacing aged and outdated facilities.
4. Improve the utilization of space on campus by replacing small single-story buildings with multi-story buildings and consolidating open space into usable-sized portions.
5. Improve the efficiency of space on campus by aligning the classroom inventory with class sizes, and building flexible, multi-use/multi-purpose spaces, and spaces that can be readily reconfigured by occupants.
6. Ensure safety of faculty, staff, and students by upgrading or replacing aging, seismically unsafe buildings and facilities.
7. Promote sustainable facilities design, construction, and operations.
8. Improve pedestrian and vehicular access and circulation on campus.
9. Upgrade classroom and laboratory spaces to provide students with up-to-date skills and modern technology.
10. Upgrade school security to keep students safe by installing emergency mass notification beacons and marquees, outdoor lighting, and up-to-date security measures including improved security and emergency communication systems and infrastructure.

III. ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

In compliance with the *State CEQA Guidelines*, Mt. SAC provided opportunities for the public and other public agencies to participate in the environmental review process (as discussed below) and/or to provide input on the 2018 EFMP and scope of the Draft EIR.

Mt. SAC distributed a Notice of Preparation ("NOP") on September 5, 2018, for a 30-day review to 51 interested agencies, organizations, and individuals. In addition to a letter from the Governor's Office of Planning and Research ("OPR") identifying that the NOP was transmitted to State agencies, a total of eight agencies and other interested parties responded to the NOP. The NOP and NOP comments are included in Appendix A, and summarized in Section 2.5, Public Review Process, of the Final EIR and are on file with Mt. SAC Facilities Planning and Management, Mt. San Antonio College, 1100 North Grand Avenue, Walnut, California 91789-1399. It should also be noted that during the NOP public review period, Mt. SAC received a consultation request pursuant to Assembly Bill ("AB") 52 from the Gabrieleño Band of Mission Indians – Kizh Nation.

On September 19, 2018, Mt. SAC held a public scoping meeting at Mt. SAC to describe the Project, answer questions, and seek public input regarding the proposed scope of the Final EIR analysis. Notice of the scoping meeting was sent to 51 interested agencies, organizations, and individuals along with a copy of the NOP. The meeting was attended by four individuals including representatives from the City of Walnut, the City of Walnut's environmental consultant, and a representative from the United Walnut Taxpayers (UWT). Only the representative from United Walnut Taxpayers spoke at the scoping meeting. Issues raised at the scoping meeting are also in Section 2.5 of the Final EIR and, along with NOP comments received, were considered in the preparation of the Final EIR.

The Draft EIR was distributed for public review and comment for a required 45-day public review period that began on April 8, 2019 and ended on May 22, 2019. In compliance with Section 15087 of the *State CEQA Guidelines*, Mt. SAC provided a public Notice of Availability ("NOA") of the Draft EIR at the same time it sent a Notice of Completion to the Office of Planning and Research. Mt. SAC used several methods to solicit comments on the Draft EIR. The NOA, Draft EIR and technical appendices was distributed via flash drive to numerous public agencies and other interested parties for review and comment. In addition, the Draft EIR was made available on Mt. SAC's website and the NOA was published in a local newspaper. The Draft EIR was submitted to the State Clearinghouse for distribution to and review by State agencies. Copies of the Draft EIR were available for review at three public libraries.

Seven comment letters were received by Mt. SAC; All of the comment letters received by Mt. SAC have been included and responded to in the Final EIR. Comments contained in the letters that address environmental issues are thoroughly responded to in Section 8.0 of the Final EIR. The Final EIR also includes revisions and clarifications to the Draft EIR as a result of the comments received. Mt. SAC staff have reviewed this information and determined that it does not constitute significant new information, so recirculation of the Draft EIR for further comment (pursuant to *State CEQA Guidelines*, § 15088.5) is not required. The Final EIR, including all responses to comments submitted on the Draft EIR were provided to the commenters, at least 10 days before final action on the Project.

IV. GENERAL FINDINGS

Mt. SAC hereby finds as follows:

- Mt. SAC is the Lead Agency for the Project evaluated in the Final EIR;
- The Draft EIR and Final EIR were prepared in compliance with CEQA and the Guidelines;
- Mt. SAC has independently reviewed and analyzed the Draft EIR and the Final EIR, and these documents reflect the independent judgment of Mt. SAC and the Mt. SAC Board of Trustees;
- A Mitigation Monitoring Program ("MMP") has been prepared for the Project, and compliance with each of the mitigation measures, project design features, and plans programs and policies set forth in the MMP has been made a condition of approval of the Project. The MMP is incorporated by reference and is considered part of the Record of Proceedings for the Project;
- The MMP designates the monitoring and reporting responsibility, method and anticipated timing for the implementation of mitigation. Mt. SAC will serve as the MMP Coordinator;
- In determining whether the Project has a significant impact on the environment, and in adopting these Findings under California Public Resources Code Section 21081; Mt. SAC has complied with California Public Resources Code Sections 21081.5 and 21082.2;
- The impacts of the Project have been analyzed to the extent feasible at the time of certification of the Final EIR;
- Mt. SAC reviewed the comments received and responses provided on the Draft EIR and has determined that neither the comments nor the responses add significant new information on environmental impacts. Mt. SAC has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these Findings, concerning the environmental impacts identified and analyzed in the Final EIR;
- The responses to the comments on the Draft EIR, which are contained in the Final EIR, clarify and amplify the analysis in the Draft EIR;
- Having reviewed the information contained in the Draft EIR, Final EIR, and Record of Proceedings, as well as the requirements of CEQA and the Guidelines regarding recirculation of Draft EIRs, and having analyzed the changes in the Draft EIR, which have occurred since the close of the public review period, Mt. SAC finds that there is no significant new information in the Final EIR and finds that recirculation is not required;
- Mt. SAC has made no decisions that constitute an irreversible commitment of resources toward the Project prior to certifying the Final EIR, nor has Mt. SAC previously committed to a definite course of action for the Project;
- Copies of all the documents incorporated by reference in the Final EIR are and have been available upon request at all times at Mt. SAC Facilities Planning and

Management, which is the custodian of record for these documents or other materials; and

- Having received, reviewed, and considered all information and documents in the record, Mt. SAC hereby conditions the Project on the requirements and determinations stated in these Findings.

V. SUMMARY OF ENVIRONMENTAL IMPACTS

Mt. SAC determined that, based on all of the evidence presented, including but not limited to the Draft and Final EIRs, written and oral testimony given at meetings and hearings, and the submission of testimony from the public, organizations, and other public agencies, the following environmental impacts associated with the project are: (1) less than significant and do not require mitigation, (2) potentially significant but will be avoided or reduced to a level of insignificance through the identified Mitigation Measures, or (3) significant and unavoidable.

VI. FINDINGS REGARDING NO IMPACT OR LESS THAN SIGNIFICANT IMPACTS NOT REQUIRING MITIGATION

Consistent with Public Resources Code section 21002.1 and section 15128 of the State CEQA Guidelines, the Final EIR focused its analysis on potentially significant impacts, and limited discussion of other impacts for which it can be seen with certainty there is no potential for significant adverse environmental impacts. State CEQA Guidelines section 15091 does not require specific findings to address environmental effects that an EIR identifies as "no impact" or a "less than significant" impact. Nonetheless, the Board of Trustees of Mt. San Antonio Community College hereby finds that the Project would have either no impact or a less than significant impact to the following resource areas:

A. Aesthetics (Section 4.1 of the Final EIR)

1. Would the project have a substantial adverse effect on a scenic vista? (Threshold 1.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less Than Significant Impact. (DEIR, pp. 4.1-9.)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.1-11.)

2. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway? (Threshold 1.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.1-11)

3. Would the project in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (Threshold 1.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less Than Significant Impact. (DEIR, pp. 4.1-16.)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.1-19.)

B. Air Quality (Section 4.2 of the Final EIR)

1. Would the project expose sensitive receptors to substantial pollutant concentrations? (Threshold 2.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.2-25)

C. Biological Resources (Section 4.3 of the Final EIR)

1. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Threshold 3.2)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.3-28)

2. Would the project have a substantial adverse effect on state or federally protected (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Threshold 3.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less than significant Impact. (DEIR, pp. 4.3-28)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.3-29)

3. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Threshold 3.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less than significant Impact. (DEIR, pp. 4.3-30)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.3-30)

4. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Threshold 3.5)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.3-31)

5. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Threshold 3.6)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less than significant Impact. (DEIR, pp. 4.3-32)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.3-32)

D. Cultural Resources (Section 4.4 of the Final EIR)

1. Would the project disturb any human remains, including those interred outside of formal cemeteries? (Threshold 4.3).

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less than significant Impact. (DEIR, pp. 4.4-24)

E. Energy (Section 4.5 of the Final EIR)

1. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Threshold 5.1).

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less than significant Impact. (DEIR, pp. 4.5-10 through 4.5-13)

2. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Threshold 5.2).

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less than significant Impact. (DEIR, pp. 4.5-13 through 4.5-17)

F. Geology and Soils (Section 4.6 of the Final EIR)

1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Threshold 6.1(i))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.6-14)

2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? (Threshold 6.1(iv))

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.6-19)

3. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? (Threshold 6.5)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No impact. (DEIR, p. 4.6-24)

G. Greenhouse Gas Emissions (Section 4.7 of the Final EIR)

1. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas emissions? (Threshold 7.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less than Significant Impact. (DEIR, pp. 4.7-22 through 26.)

H. Hazards and Hazardous Materials and Wildfire (Section 4.8 of the Final EIR)

1. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Threshold 8.1)

2. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Threshold 8.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less than Significant Impact. (DEIR, pp. 4.8-10.)

Project-Specific

Finding: Less than Significant Impact. (DEIR, pp. 4.8-11 through 4.8-12.)

3. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school? (Threshold 8.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less than Significant Impact. (DEIR, pp. 4.8-12 through 4.8-13.)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.8-13 through 4.8-14.)

4. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Threshold 8.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less than Significant Impact. (DEIR, pp. 4.8-14 through 4.8-15.)

5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (Threshold 8.5)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.8-15)

6. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Threshold 8.6)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Less than Significant Impact. (DEIR, pp. 4.8-15 through 4.8-16.)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.8-16 through 4.8-17.)

7. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires? (Threshold 8.7)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.8-17 through 4.8-18.)

8. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? (Threshold 8.8)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.8-17 through 4.8-18.)

9. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Threshold 8.9)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.8-17 through 4.8-18.)

10. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (Threshold 8.10)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.8-17 through 4.8-18.)

11. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslide, as a result of runoff, post-fire slope instability, or drainage changes? (Threshold 8.11)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.8-17 through 4.8-18.)

I. Hydrology and Water Quality (Section 4.9 of the Final EIR)

1. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Threshold 9.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-19.)

2. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site? (Threshold 9.3 (i))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-20 through 4.9-22.)

3. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site? (Threshold 9.3(ii))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-20 through 4.9-22.)

4. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Threshold 9.3(iii))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-20 through 4.9-22.)

5. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows? (Threshold 9.3(iv))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-20 through 4.9-22.)

6. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Threshold 9.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-22 through 4.9-23.)

7. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (Threshold 9.5).

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.9-23 through 4.9-24.)

J. Land Use and Planning (Section 4.10 of the Final EIR)

1. Would the Project physically divide an established community? (Threshold 10.1.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No impact. (DEIR, pp. 4.10-13.)

1. Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Threshold 10.2.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.10-13 through 4.10-25.)

K. Noise (Section 4.11 of the Final EIR)

1. Would the project generate substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies? (Threshold 11.1)

Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.11-16 through 4.11-21.)

2. Would the project generate substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies? (Threshold 11.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.11-22 through 4.11-28.)

3. Would the project generate excessive groundborne vibration or groundborne noise levels? (Threshold 11.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.11-28 through 4.11-29.)

4. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Threshold 11.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No impact. (DEIR, pp. 4.11-29.)

L. Population and Housing (Section 4.12 of the Final EIR)

1. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)? (Threshold 12.1.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.12-5 through 4.12-7.)

2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (Threshold 12.2.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No impact. (DEIR, pp. 4.12-7.)

M. Public Services and Recreation (Section 4.13 of the Final EIR)

1. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection? (Threshold 13.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.13-12 through 4.13-13.)

2. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection? (Threshold 13.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.13-14 through 4.13-15.)

3. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain

acceptable service ratios, response times or other performance objectives for schools? (Threshold 13.3.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.13-15.)

4. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities? (Threshold 13.4.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.13-16 through 4.13-17.)

5. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Threshold 13.5)

6. Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (Threshold 13.6)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.13-17.)

N. Traffic (Section 4.14 of the Final EIR)

1. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (Threshold 14.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.14-35)

2. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Threshold 14.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.14-35 through 4.14-36.)

O. Tribal Cultural Resources (Section 4.15 of the Final EIR)

1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074

as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). (Threshold 15.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: No Impact. (DEIR, pp. 4.15-6 through 4.15-7.)

P. Utilities and Service Systems (Section 4.16 of the Final EIR)

1. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment facilities or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? (Threshold 16.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.16-8 through 4.16-12.)

2. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Threshold 16.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.16-12 through 4.16-13.)

3. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Threshold 16.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.16-13.)

4. Generate solid waste in excess of State or local standards, in in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste goals? (Threshold 16.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.16-14 through 4.16-15.)

5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Threshold 16.5.)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Less Than Significant Impact. (DEIR, pp. 4.16-15.)

VII. FINDINGS REGARDING IMPACTS DETERMINED TO HAVE A LESS THAN SIGNIFICANT IMPACT AFTER THE INCORPORATION OF MITIGATION

The Final EIR determined that the Project would result in less than significant impacts for certain impact categories with (1) implementation of project-level mitigation measures ("MMs") identified to reduce potentially significant project impacts to a less than significant level. MMs will be implemented pursuant to the Mitigation Monitoring Program ("MMP") prepared for the Project.

Mt SAC having reviewed and considered the information contained in the Final EIR, the Technical Appendices and the administrative record, finds, pursuant to Section 21081(a)(1) of the *California Public Resources Code* and Section 15091(a)(1) of the State CEQA Guidelines that

> *"changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR"*

for the impacts discussed below.

A. Aesthetics (Section 4.1 of the Final EIR)

1. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Threshold 1.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Implementation of the Project would introduce new light sources and potential glare on campus and surrounding area. However, the proposed development, and installation of new lighting would occur in an area with existing sources of light and glare and would be conducted in compliance with the City of Walnut's requirements. Implementation of MM AES-1 is required to reduce the impact to a less than significant level. (DEIR, pp. 4.1-21 through 4.1-22)

Facts in Support of Finding:

Light

Lighting installed in construction areas to provide security for construction equipment and construction materials may cause a significant impact in the form of a nuisance to Timberline residents to the north and south of the campus. MM AES-1 requires that temporary nighttime lighting that is installed for security purposes be downward-facing and hooded or shielded to prevent security lighting from spilling outside the staging area or from directly broadcasting security lighting into the sky or onto adjacent residential properties. With implementation of MM AES-1, potential lighting impacts during construction would be reduced to a less than significant level.

Consistent with the Landscape Guidelines included in the Appendix to the 2018 EFMP, exterior site lighting would be provided as necessary to promote safety, security, sustainability, and a unified campus character through the design, installation, and maintenance of outdoor lighting. Lighting would be associated with new and reconfigured parking areas, roadways, pedestrian walkways, bikeways and bicycle storage facilities,

buildings, and landscape features. Additionally, as discussed in more detail below, athletic lighting would be provided at the proposed tennis courts.

Lighting under the 2018 EFMP would be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare. In general, and with the exception of lighting associated with the proposed Parking Structure R and Tennis Courts project, which is analyzed in detail below, lighting would be consistent with existing conditions on campus and in the adjacent residential communities and would not create a new source of substantial light that would adversely affect nighttime views in the area. This impact would be less than significant, and no mitigation is required.

Glare

Lighting would likely be used within the construction areas (notably the construction staging areas) to provide security for construction equipment and construction materials. MM AES-1 requires that temporary nighttime lighting that is installed for security purposes be downward-facing and hooded or shielded to prevent security lighting from spilling outside the staging area or from directly broadcasting security lighting into the sky or onto nearby residential properties. These measures would also serve to reduce potential glare impacts to a less than significant level.

To address potential issues related to glare, as part of the implementation of the 2018 EFMP, Mt. SAC will be developing design guidelines and building standards to provide direction regarding the physical design of building elements, including exterior building materials. These guidelines and standards will require that building materials and finishes reduce glare and minimize reflectivity wherever possible; and, with installation of planned landscaping around the buildings, exterior building materials would not result in potentially significant glare impacts within the campus or surrounding areas, consistent with existing conditions. The potential for glare from buildings is less than significant, and no mitigation is required.

The 2018 EFMP would involve the installation of new lighting as necessary to provide sufficient lighting for proposed activities, security, and safety. All proposed lighting would be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare. In addition to the proposed addition of Parking Structures R and S as part of Phase 1A, the Project would involve modifications to existing parking lots and construction of new parking structures. However, parking facilities would be provided in areas similar to existing conditions and would not result in substantial new sources of glare from vehicle headlights. This is because the access for the parking areas would be similar to existing conditions and because existing landscaping would be retained or new landscaping would be installed in and around the parking areas which would reduce the potential for glare from vehicle headlights. The vehicular circulation would also follow existing patterns. Therefore, the potential increase in glare from campus safety and security lighting and vehicle headlights that would occur with implementation of the 2018 EFMP (Phases 1A, 1B, and 2) would not represent a new source of substantial glare; and this impact would be less than significant.

The potential glare from proposed athletic facility lighting at the Parking Structure R and Tennis Courts would be the most notable visual change associated with on-campus lighting to be installed as part of the Project. Tennis court lighting would be installed with

Phase 1A but is assumed in the analysis presented above for Phases 1A and 1B. As identified above, potential glare impacts from athletic field lighting would be less than significant.

Project-Specific

Finding: Implementation of the Project would introduce new light sources and potential glare on campus and surrounding area. However, the proposed development, and installation of new lighting would occur in an area with existing sources of light and glare and would be conducted in compliance with the City of Walnut's requirements. Implementation of MM AES-1 is required to reduce the impact to a less than significant level. (DEIR, pp. 4.1-24)

Facts in Support of Finding:

Light

Construction activities would be limited to daytime hours. While the hours of construction may be limited, lighting would likely be used within the construction areas (notably the construction staging areas) to provide security for construction equipment and construction materials. This type of temporary security lighting is often unshielded and may shine onto adjacent properties and roadways. None of the proposed development under Phases 1A and 1B is adjacent to residential uses; and any necessary temporary security lighting on the construction sites would be shielded from view by surrounding development, topography, and vegetation.

The Project involves the installation of exterior site lighting as necessary for safety, security, sustainability, and a unified campus character through the design, installation, and maintenance of outdoor lighting. Lighting would be associated with new and reconfigured parking areas (surface lots and parking structures), roadways, pedestrian walkways, bikeways and bicycle storage facilities, buildings, and landscape features. Additionally, athletic lighting would be provided at the proposed tennis courts. All proposed lighting would be installed interior to the campus and would be installed so that all direct rays are confined to the site and would not spill over onto adjacent off-campus properties.

Athletic field lighting would be installed during Phase 1A at the tennis courts located on the top level of Parking Structure R. The tennis court lighting would be designed to allow for nighttime recreational play and would comply with National Collegiate Athletic Association (NCAA) standards. The analysis presented in this section for Phases 1A and 1B is based on a lighting study developed by Musco Lighting. The lighting study assumes up to twenty-four 50-foot poles with approximately 72 luminaires (fixtures) would be installed. The lighting is proposed to maximize the use of campus facilities by allowing for safe use of the athletic fields in the evening hours (no later than 10:00 PM), while also minimizing impacts to off-campus uses, including spill light and glare light.

The lighting system that would be used consists of light emitting diode (LED) fixtures and not metal halide, which is an older technology; use of metal halide fixtures would result in higher lighting levels. The light fixtures would include reflectors that direct the light onto the field, reducing sky glow and spill light onto neighboring properties, and a visor assembly that works in conjunction with the reflector to provide more light control and

reduce glare on and off the field. Therefore, impacts from spill light would be less than significant.

Glare

While the hours of construction may be limited, lighting would likely be used within the construction areas (notably the construction staging areas) to provide security for construction equipment and construction materials. MM AES-1 requires that temporary nighttime lighting that is installed for security purposes be downward-facing and hooded or shielded to prevent security lighting from spilling outside the staging area or from directly aiming security lighting into the sky or onto nearby residential properties. These measures would also serve to reduce potential glare impacts during construction to a less than significant level.

The Project would involve the installation of new lighting as necessary to provide sufficient lighting for proposed activities, security, and safety. All proposed lighting would be designed and installed so that all direct rays are confined to the site and adjacent properties are protected from glare. Phases 1A and 1B would involve the construction of two new parking structures in the central portion of the campus. Parking would occur in areas similar to existing conditions for Parking Structures R and S; and, therefore, substantial new sources of glare from vehicle headlights would not result. Additionally, the vehicular circulation for both parking structures would follow existing patterns. Therefore, the potential increase in glare from campus safety and security lighting and vehicle headlights that would occur with implementation of Phases 1A and 1B would not represent a new source of substantial glare, and this impact would be less than significant.

The potential glare from proposed athletic facility lighting at the tennis courts would be the most notable visual change associated with on-campus lighting to be installed as part of the Project. Tennis court lighting would be installed with Phase 1A. As previously identified, night lighting from sports facilities is commonly the brightest source of light in the nighttime landscape. The expected level of glare has been calculated by Musco Lighting.

The maximum candela would occur within the tennis courts. The level of glare would decrease immediately outside the boundaries of the tennis courts, and no glare from the tennis court lighting would occur. The proposed athletic facility lighting system and operations have also been designed to reduce the potential impact from glare to a less than significant level.

MMs:

MM AES-1 Prior to initiation of construction activities, Mt. SAC shall ensure that the contract documents require any temporary nighttime lighting installed during construction, for security or any other purpose, be downward-facing and hooded or shielded to prevent light from spilling outside the staging area and from directly broadcasting security light into the sky or onto adjacent residential properties.

B. Air Quality (Section 4.2 of the Final EIR)

1. Would the project conflict with or obstruct implementation of the applicable air quality plan? (Threshold 2.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Implementation of the Project would generate short-term air pollutant emissions; however, with implementation of MM AQ-1, requiring that all off-road diesel-powered construction equipment greater than 50 horsepower ("hp") shall meet Tier 4 off-road emissions standards, NOx emissions would be reduced to less than the SCAQMD threshold for NOx. Impacts related to long-term air pollutant emissions would be less than significant and no mitigation is required. (DEIR, pp. 4.2-20 through 4.2-23)

Facts in Support of Finding: NOx emissions during construction in 2019 would exceed the SCAQMD threshold of 100 pounds per day. Implementation of MM AQ-1, requiring that all off-road diesel-powered construction equipment greater than 50 horsepower ("hp") shall meet Tier 4 off-road emissions standards, would MM AQ-1 would reduce NOx emissions to less than the SCAQMD threshold for NOx. Although Phase 2 construction emissions are likely to be comparable to or less than Phase 1A and 1B emissions, emissions would potentially exceed thresholds; and therefore, Phase 2 construction would also be required to comply with MM AQ-1 to reduce impacts to less than significant. Impacts related to regional construction emissions for Phases 1A, 1B, and 2 would be less than significant with mitigation. No significant localized air quality impacts would occur from Phase 1A- and Phase 1B-related air pollutant emissions attributable to the Project. Emissions from Phase 2 emissions would be comparable to or less than the emissions generated from overlapping phasing of Phases 1A and 1B, and the receptors would be greater than the 25-meter-threshold used in this analysis. Therefore, it can be reasonably assumed that localized emissions would be less than the respective LST thresholds for Phase 2. This impact would be less than significant with mitigation.

The 2018 EFMP's operational emissions would be less than the SCAQMD CEQA significance thresholds for all criteria pollutants. In addition, operational impact on regional emissions would be less than significant. The 2018 EFMP would not result in the creation of a CO hotspot. Further, the 2018 EFMP was found to be consistent with the current Congestion Management Program for Los Angeles County and would not conflict with the 2016 AQMP would occur with the Project.

2. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Threshold 2.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: The mass daily operational emissions would be less than SCAQMD significance thresholds. The cumulative operational impact of nonattainment pollutants would be less than significant. With the implementation of MM AQ-1, the Project regional construction emissions of O3 precursor NOx would not exceed the thresholds of significance

recommended by the SCAQMD. This impact would be less than significant with mitigation. (DEIR, pp. 4.2-24)

Facts in Support of Finding: The South Coast Air Basin ("SoCAB") is in nonattainment for ozone (O3) (VOC and nitrogen oxides [NOx] are O3 precursors), particles smaller than or equal to 10 microns in diameter size (PM10) and smaller than or equal to 2.5 microns in diameter (PM2.5). The 2018 EFMP would contribute criteria pollutants to the area during short-term construction and long-term operational activities. The Project regional construction emissions of O3 precursor NOx would be less than significant with mitigation (MM AQ-1). Therefore, the 2018 EFMP's short-term construction emissions of the nonattainment pollutants would not be cumulatively considerable. The mass daily operational emissions would be less than SCAQMD significance thresholds. The cumulative operational impact of nonattainment pollutants would be less than significant.

MMs:

MM AQ-1 All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 4 final off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB). Any emissions-control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

C. Biological Resources (Section 4.3 of the Final EIR)

1. Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Threshold 3.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: The Project improvements and construction activities would result in potential impacts to the intermediate mariposa lily (a CRPR List 1B.2 species). These potentially significant impacts would be reduced to less than significant levels with incorporation of MM BIO-1 into the Project. Implementation of Mitigation Measure BIO-2 requiring implementation of minimization and mitigation requirements in the Mt. SAC California Black Walnut Management Plan would reduce potential impacts to southern California black walnut to less than significant levels. Implementation of MM BIO-3 would reduce potentially significant impacts related to nesting birds to less than significant levels. (DEIR, p. 4.3-23, 24, 25).

Facts in Support of Finding:

Direct Impacts

There are no State or federally listed Threatened or Endangered plant species with the potential to occur in the survey area. Impacts on small numbers of non-listed CRPR List 4.2 species are not likely to meet the significance criteria under State CEQA Guidelines, as the impacts are negligible on regional population abundance and distribution. Non listed CRPR List 4.2 species tend to be wider spread than Threatened or Endangered species, and no significant impacts would likely occur if the species were present. Potential impacts to the intermediate mariposa lily (a CRPR List 1B.2 species), however, may be considered significant due to the rarity of the species. Implementation of MM BIO-1 requiring focused special status plant surveys and, if needed, preparation and implementation of an Avoidance and Mitigation Plan including on-site translocation of any bulbs of special status plant species within the impact area would reduce the impact on intermediate mariposa lily to less than significant.

One special status plant species was observed during the survey: southern California black walnut. Direct impacts to southern California black walnut may occur during implementation of Phase 2 of the Project. Implementation of Mitigation Measure BIO-2 requiring implementation of minimization and mitigation requirements in the Mt. SAC California Black Walnut Management Plan would reduce impacts to less than significant levels.

Ten special status wildlife species have a low to moderate potential to occur within the survey area. The survey area does not contain the preferred habitat for these species and none of these species were observed during the survey. However, suitable habitat occurs near the survey area, and the close proximity to this habitat may facilitate low numbers of the species in the survey area. Due to the expectation that occurrence on the Project site

would be limited, impacts to these species would be considered adverse but less than significant per State CEQA guidelines, and no mitigation is required.

Suitable nesting habitat for migratory birds is present throughout all habitats of the Project site and adjacent areas and could be adversely impacted either directly or indirectly. The loss of an active nest may be considered a violation of the California Fish and Game Code protecting nesting birds, resulting in a significant impact; however, implementation of MM BIO-3 requiring that protective measures be undertaken, including a pre-construction survey and, if an active nest is found, delineation of a buffer zone during construction activities, would reduce potentially significant impacts to less than significant levels.

Indirect Impacts

Implementation of Phases 1A, 1B, and 2 of the 2018 EFMP have the potential to indirectly impact special status species utilizing adjacent habitat as a result from increases in noise, human activity, and night lighting. During construction, temporary noise impacts have the potential to disrupt foraging, nesting, roosting, and denning activities for a variety of wildlife species. Because wildlife species expected to occur on or adjacent to the survey area are not listed as Threatened or Endangered by State or federal resource agencies, are limited in other special status designations, have limited and low-quality potential habitat, and are limited in numbers if present, these impacts are considered adverse but less than significant. Due to the generally developed/disturbed nature of the survey area and the distance from open space areas, the increase in human activity during construction is not expected to have an impact on normal foraging and breeding behavior of wildlife that remain in the area adjacent to the Project, and no mitigation is required.

All lighting (construction, security, or otherwise) would be directed only toward the identified work or staging areas and would be shielded to prevent illumination of adjacent vegetated areas. Any potential direct impact resulting from night lighting would be less than significant, and no mitigation is required.

Project-Specific

Finding: The Project improvements and construction activities would result in potential impacts to the intermediate mariposa lily (a CRPR List 1B.2 species). These potentially significant impacts would be reduced to less than significant levels with incorporation of MM BIO-1 into the Project. Implementation of MM BIO-3 would reduce potentially significant impacts related to nesting birds to less than significant levels. (DEIR, p. 4.3-25, 26)

Facts in Support of Finding:

Direct Impacts

The impacts identified above for Phases 1A, 1B, and 2 would apply to the individual projects proposed for development as part of Phases 1A and 1B except for potential impacts to southern California black walnut which are only a potential under implementation of Phase 2. Phases 1A and 1B, which include development of a Student Center and Central Campus Infrastructure, Bookstore, Parking Structure R and Tennis Courts and Parking Structure S and West Temple Avenue Pedestrian Bridge, and Sand

Volleyball Courts and Parking Lot W Reconstruction, have the potential to impact special status plants (other than the southern California black walnut), nesting birds, and the coastal whiptail. Similar to the Program-level Analysis under the 2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) Impacts Section, mitigation is provided to lessen any potentially significant impacts to special status plants (MM BIO-1) and nesting birds (MM BIO-3). Consistent with the analysis presented above, impacts to special status wildlife species would be less than significant, and no mitigation is required.

Indirect Impacts

The impacts identified above for Phases 1A, 1B, and 2 would apply to the individual projects proposed for development as part of Phases 1A and 1B. Similar to the Program-level Analysis under the 2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) Impacts Section, potentially significant impacts are not expected for construction-related noise, human activity, or night lighting; and no mitigation is required.

2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Threshold 3.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: The Project improvements and construction activities would not result in indirect impacts to riparian habitat. The Project would be developed in compliance with the requirements set forth in the California Black Walnut Management Plan as detailed in MM BIO-2 which would reduce potential direct impacts to southern California black walnut to less than significant levels. (DEIR, p. 4.3-27)

Facts in Support of Finding:

Direct Impacts

Development of the 2018 EFMP (Phases 1A, 1B, and 2) generally include construction of new structures on the campus and circulation and infrastructure improvements. One special status vegetation type, California walnut groves, has been mapped within the survey area. Impacts to 1.96 acres of California walnut groves would be considered potentially significant. As previously discussed, Mt. SAC is required to implement the Mt. San Antonio College California Black Walnut Management Plan. According to the California Black Walnut ("CBW") Management Plan, mitigation ratios in an on-campus conservation area shall be no less than 1:1 and are tree based on size. The CBW Plan requires the installation of the proposed mitigation within one year from completion of the major site grading. Compliance with the requirements set forth in the California Black Walnut Management Plan as detailed in MM BIO-2 would reduce this potential impact to less than significant.

Indirect Impacts

Phases 1A, 1B, and 2 have the potential to indirectly impact special status vegetation. These impacts may result from temporary or long-term changes in water quality or increases in human activity and invasive plant species. During construction, runoff

carrying silt or petroleum residues from construction equipment has the potential to impact water quality and, in turn, affect plant and wildlife species using the Sand Canyon Wash and downstream waters. Construction activities shall comply with applicable provisions of the National Pollutant Discharge Elimination Permit ("NPDES") and associated Stormwater Pollution Prevention Program ("SWPPP"). Application of Best Management Practices ("BMPs") pursuant to the NPDES Construction General Permit would protect water quality, avoiding potential impacts to the drainages adjacent to the survey area. An incremental increase in human intrusion into adjacent open space may occur as a result of the Project. However, due to existing levels of activity on the campus, this increase would be less than significant, and no mitigation would be required. Phases 1A and 1B would include landscaping of areas within the campus boundary. According to the 2018 EFMP and the Landscape Guidelines found in the Appendix, non-native, invasive species are not included in the proposed site and infrastructure improvements; therefore, impacts related to invasive plant species would be less than significant.

3. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Threshold 3.5)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Potentially significant impacts to southern California black walnut would be reduced to less than significant levels with incorporation of MM BIO-2. (DEIR, p. 4.3-31)

Facts in Support of Finding: Development of the 2018 EFMP Phase 2 may include impacts to the southern California black walnut trees along the slopes of the hillside adjacent to the proposed underground utilities infrastructure water tanks in the Farm Precinct. These impacts would conflict with the Mt. SAC California Black Walnut Management Plan, which could result in potentially significant impacts. Implementation of MM BIO-2 would eliminate any potential conflict with this policy and any impact would be less than significant.

MMs:

MM BIO-1 Focused special status plant surveys will be conducted in habitat suitable for intermediate mariposa lily (*Calochortus weedii var. intermedius*) in the survey area within two years prior to any ground disturbance at that location. Focused surveys shall be conducted by qualified Biologists and shall be conducted per the most current California Native Plant Society (CNPS) protocol and during the appropriate blooming period for the species, specifically May through July. If special status plant species are not found within the project impact area, no further mitigation would be required. If the species is detected within impact areas, an Avoidance and Mitigation Plan will be developed and implemented by Mt. SAC prior to project implementation. The Avoidance and Mitigation Plan would include on-site translocation of any bulbs of the species within the impact area.

MM BIO-2 During grading and construction activities, should any southern California black walnut tree be impacted, including trimming greater than one-quarter of a tree's canopy, significant digging or trenching within the tree's dripline,

or tree removal, the impacts shall be mitigated according to the Mt. SAC *California Black Walnut Management Plan* (Helix 2012). At a minimum, the loss of any southern California black walnut trees resulting from the project shall be replaced in the designated on-site conservation area at a ratio of 1:1 for each tree with a trunk greater than 6 inches in diameter at breast height and at a higher replacement ratio for smaller trees.

MM BIO-3 No project-related activities shall result in the failure of a nest protected under the conditions set forth in the California Fish and Game Code. The nature of the project may require that work would be initiated during the breeding season for nesting birds [February 15–August 31 (or September 15 if riparian habitat is in the impact area)]. To avoid direct impacts on active nests, a pre-construction survey shall be conducted by a qualified Biologist for nesting birds and/or raptors within three days prior to clearing of any vegetation or any work near existing structures (i.e., within 50 feet for nesting birds and within 500 feet for nesting raptors). A nesting bird survey shall also be conducted prior to any project activities initiated during the breeding season within 500 feet of vegetation dominated by native shrub species (such as vegetation types associated with coastal sage scrub habitat). If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed.

If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone (at a minimum of 25 feet) around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) clearing limits shall be established within a buffer around any occupied nest (the buffer shall be 25–100 feet for nesting birds and 300–500 feet for nesting raptors or special status bird species), unless otherwise determined by a qualified Biologist; and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction can proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

D. Cultural Resources (Section 4.4 of the Final EIR)

1. Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5? (Threshold 4.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: The potential to encounter previously unidentified archaeological resources is potentially a significant impact for any project implementing the 2018 EFMP. Incorporation of MM CULT-3 would reduce this impact to a less than significant level. (DEIR, pp. 4.4-23 through 4.4-24.)

Facts in Support of Finding: No known archaeological resources are within the campus boundaries, and no archaeological resources were found during the pedestrian survey. Additionally, no known archaeological resources are within a half mile of the campus. However, Mt. SAC is located within a region of California that has evidence for human occupation dating back several thousand years, and archaeological resources have potential to be buried in native sediments beneath the campus. The potential to encounter previously unidentified archaeological resources is potentially a significant impact for any project implementing the 2018 EFMP. This impact would be reduced to a less than significant level with implementation of MM CULT-3, which requires attendance by a qualified archaeologist at the pre-grade conference and identifies actions to take in the event that cultural resources (i.e., prehistoric sites, historic sites, and/or isolated artifacts) are discovered.

MMs:

MM CULT-3 Prior to initiation of grading activities, the following requirements shall be incorporated on the cover sheet of the Grading Plan under the general heading "Conditions of Approval":

a. A qualified Archaeologist that meets the Secretary of the Interior's Standards and Guidelines for Professional Qualifications in Archaeology (Archaeologist) shall be present at the pre-grade meeting to consult with the grading Contractor and other consultants prior to the start of earth-moving activities occurring within native sediments. Cultural resource monitoring is not required in areas where excavation occurs within non-native soils.

b. During construction grading and site preparation activities, the Contractor shall monitor all construction activities occurring within native sediment. In the event that cultural resources (i.e., prehistoric sites, historic sites, and/or isolated artifacts) are discovered, work shall be halted immediately within 50 feet of the discovery and the Contractor shall inform the Mt. SAC Project Manager. The Archaeologist shall analyze the significance of the discovery and recommend further appropriate measures to reduce further impacts on archaeological resources. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.

E. Geology & Soils (Section 4.6 of the Final EIR)

1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? (Threshold 6.1(ii))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: The Mt. SAC campus is located in the highly seismic southern California region, due to the proximity of known active faults. With implementation of MM GEO-1 and MM GEO-2, potential impacts would be less than significant. (DEIR, pp. 4.6-14 through 4.6-15.)

Facts in Support of Finding: According to the 2018 City of Walnut General Plan, Public Safety Element, moderate to severe ground shaking may be expected within the City, including at Mt. SAC. The possibility of ground acceleration or shaking on any part of the campus, including any areas to be developed in the future under the 2018 EFMP, is similar to that for all of Southern California and is considered a potentially significant impact. However, implementation of MM GEO-1 requires site-specific geotechnical studies (in accordance with the DSA's Geohazard Report Requirements) to determine appropriate site and building designs, which would reduce potential impacts related to soil and geologic constraints to less than significant levels. MM GEO-2 requires structural design and construction to be completed in accordance with the recommendations of the geotechnical study. The DSA will review building plans and certify completed school buildings for compliance with Title 24, the Field Act, and the recommendations of the site-specific geotechnical studies. Thus, impacts would be less than significant after implementation of MM GEO-1 and MM GEO-2.

Project-Specific

Finding: Implementation of MM GEO-1, MM GEO-2, and MM GEO-3 and compliance with applicable local and State regulatory requirements would reduce potential impacts from strong seismic ground shaking to less than significant level for the proposed Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, and Student Center and Central Campus Infrastructure. (DEIR, pp. 4.6-15 through 4.6-16.)

Facts in Support of Finding: The project-specific geotechnical study reports prepared for Parking Structure R and Tennis Courts, and Parking Structure S and West Temple Avenue Pedestrian Bridge, and the Student Center and Central Campus Infrastructure conclude that, given the proximity of the campus to fault zones within 50 miles of the campus, intense ground shaking may occur in the future. The possibility of ground acceleration or shaking on the Mt. SAC campus, including the areas to be developed and/or improved, is considered similar to that for all of Southern California and is considered a potentially significant impact. The geotechnical study reports also conclude that building on all three proposed improvement sites is geotechnically feasible provided all recommendations, including concurrence with State building code requirements and accepted industry standards, are implemented during design, grading, and construction. Implementation of MM GEO-2 requires that recommendations from the geotechnical study reports are included in site preparation and building design specifications to ensure that potential impacts associated with strong seismic ground shaking are less than significant at each proposed development site. Additionally, grading activities and would be conducted in compliance with current CBC and City of Walnut grading requirements per MM GEO-3.

Due to the proximity of the proposed Bookstore site to the proposed Student Center and Central Campus Infrastructure site, geologic and seismic conditions at the Bookstore site are expected to be similar to those at the Student Center site. However, a site-specific

geotechnical study would have to be prepared for the Bookstore, as required by MM GEO-1. In addition, as stated in MM GEO-2, building design, grading and construction associated with the Bookstore would also be required to comply with recommendations identified in the geotechnical study prepared for the Bookstore. Construction of the proposed Sand Volleyball Courts and Parking Lot W Reconstruction would be subject to limited DSA review but would still require compliance with current CBC and City of Walnut grading requirements (MM GEO-3).

Thus, implementation of MM GEO-1, MM GEO-2, and MM GEO-3 and compliance with applicable local and State regulatory requirements would reduce potential impacts from strong seismic ground shaking to less than significant levels.

2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction? (Threshold 6.1(iii))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: A majority of the Mt. SAC campus is located within a designated Liquefaction Hazard Zone according to the 2018 *City of Walnut General Plan*, Public Safety Element. Implementation of MM GEO-1, requiring Project-specific geotechnical and geologic investigations for projects implementing the 2018 EFMP, would reduce potential impacts from strong seismic ground shaking to less than significant level. (DEIR, pp. 4.6-16 through 4.6-17.)

Facts in Support of Finding: According to the recently adopted 2018 *City of Walnut General Plan*, Public Safety Element, and as shown on Exhibit 4.6-1, Seismic Hazard Zone Map, a majority of the campus is designated as a Liquefaction Hazard Zone; however, the designation does not mean that all areas within the Zone will experience liquefaction. This geotechnical issue is common in Southern California and can be mitigated by typical design and construction practices (such as design in accordance with the CBC). Project-specific geotechnical and geologic investigations are required for projects implementing the 2018 EFMP (refer to MM GEO-1). Design and construction following the recommendations contained in the project-specific geotechnical studies and compliance with applicable local and State regulations would ensure the potential for significant geologic and geotechnical hazards related to seismically induced liquefaction is less than significant.

Project-Specific

Finding: A majority of the Mt. SAC campus is located within a designated Liquefaction Hazard Zone according to the 2018 City of Walnut General Plan, Public Safety Element. Implementation of MM GEO-1, MM GEO-2, and MM GEO-3 and compliance with applicable local and State regulatory requirements would reduce potential impacts from strong seismic ground shaking to less than significant level. (DEIR, pp. 4.6-17 through 4.6-18.)

Facts in Support of Finding: According to the geotechnical study report prepared for the proposed Student Center and Central Campus Infrastructure, based on the site-specific liquefaction analysis, the Student Center site would not be at risk for ground failure from

liquefaction (Converse Consultants 2017c). While site conditions at the Bookstore site may be similar to those at the Student Center site due to proximity, a site-specific geotechnical study would have to be prepared for the Bookstore site, as per MM GEO-1. Compliance with the recommendations of the site-specific geotechnical study for the Bookstore site (MM GEO-2) would avoid the hazards associated with liquefaction.

The project-specific geotechnical study reports included design and construction recommendations to alleviate potential impacts related to liquefaction. These include over-excavation and re-compaction of areas underlain by alluvial soils, use of structural fill, subgrade preparation, and foundation and pavement design that accounts for static and differential settlements. Implementation of the recommended design methods would reduce potential project-related impacts related to liquefaction to less than significant levels. Therefore, implementation of MM GEO-2, requiring that recommendations from the geotechnical study reports be included in site preparation and building design specifications, would reduce potential impacts associated with seismic-related ground failure to less than significant levels.

In addition, the proposed Sand Volleyball Courts and Parking Lot W Reconstruction may not require a geohazard report, but the restroom building would require preparation of a geohazard report for review and approval by the DSA (DSA 2015b). Compliance with MM GEO-1 and MM GEO-2 for the restroom building would prevent hazards associated with liquefaction. Construction of the proposed Sand Volleyball Courts and associated restroom facility would also be subject to compliance with current CBC.

3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? (Threshold 6.1(iv))

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: A small area along the northern campus boundary in the vicinity of Bonita Avenue and Edinger Way is designated as a landslide hazard area. Implementation of MM GEO-1, MM GEO-2, and MM GEO-3 would reduce potential impacts from strong seismic ground shaking to less than significant level. (DEIR, pp. 4.6-18.)

Facts in Support of Finding: According to the recently adopted 2018 City of Walnut General Plan, Public Safety Element, the majority of Mt. SAC is not within a designated seismically induced landslide area (Walnut 2018). As shown on Exhibit 4.6-1, Seismic Hazard Zone Map, a small area along the northern campus boundary in the vicinity of Bonita Avenue and Edinger Way is designated as a landslide hazard area. This area is near the site for the proposed School of Continuing Education and Adult Education buildings, and the potential for landslides is a potentially significant impact that requires remediation. Similarly, the proposed water tanks and roads at the northeastern corner and emergency access road at the southern section would be located in or near landslide hazard areas and would present a potentially significant impact. Implementation of MM GEO-1, requiring site-specific geotechnical studies to determine appropriate site and building designs for the proposed School of Continuing Education, Adult Education, and water tanks, and MM GEO-2, which requires compliance with the recommendations of site-specific geotechnical studies, would reduce these potential impacts to less than significant levels. In addition, these buildings, site improvements, and roads would be

required to comply with current CBC and City of Walnut grading requirements (MM GEO-3).

4. Would the project result in substantial soil erosion or the loss of topsoil? (Threshold 6.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Compliance with the NPDES Construction General Permit, MM HYD-2 and City of Walnut grading requirements (MM GEO-3) would reduce erosion and sedimentation impacts during construction and long-term operations to less than significant levels. (DEIR, pp. 4.6-19 through 4.6-20.)

Facts in Support of Finding: In compliance with the NPDES permit, erosion potential during construction activities would be managed with Best Management Practices ("BMPs") implemented at each construction site as part of a Stormwater Pollution Prevention Plan ("SWPPP") during construction activities to minimize erosion impacts. As part of the SWPPP, erosion and sediment control BMPs would be required as discussed in Section 4.9, Hydrology and Water Quality, of the Final EIR. In addition to the requirements of the NPDES General Construction Permit, MM HYD-2 in Section 4.9, Hydrology and Water Quality, requires that individual projects incorporate permanent stormwater management features that would collectively meet the requirements set forth in the Low Impact Development ("LID") Manual and include permanent BMPs that would reduce loose soils, sediment, and other pollutants from stormwater runoff. Compliance with the NPDES Construction General Permit, MM HYD-2 and City of Walnut grading requirements (MM GEO-3) would reduce erosion and sedimentation impacts during construction and long-term operations. Stormwater quality impacts resulting from erosion during construction and long-term operations would be less than significant after mitigation.

5. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (Threshold 6.3)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Implementation of MM GEO-1 and MM GEO-2 would reduce impacts associated with landslides, potential impacts related to liquefaction, and subsidence, to less than significant levels. (DEIR, pp. 4.6-20 through 4.6-21.)

Facts in Support of Finding: Impacts associated with landslides would be less than significant with implementation of MM GEO-1 and MM GEO-2; and potential impacts related to liquefaction would be reduced to less than significant with implementation of MM GEO-1 and MM GEO-2 requiring site-specific geotechnical studies and incorporating geotechnical recommendations into site and building designs. As no significant slopes or embankments are within the development areas of the 2018 EFMP, the potential for lateral spreading is considered negligible and no impacts would occur. The project-specific geotechnical study reports prepared for implementation of the 2018 EFMP identify that the potential for subsidence and collapse should be factored into the determinations of

construction equipment types and grading techniques. Therefore, impacts are considered to be potentially significant; and implementation of MM GEO-1 requiring site-specific geotechnical studies to determine appropriate site and building design considerations for earthwork, site grading, seismic design, foundation and pavement design, site drainage, and construction recommendations would reduce potential impacts related to subsidence and collapse to less than significant levels.

Project-Specific

Finding: Implementation of MM GEO-1, MM GEO-2 and MM GEO-3 would reduce impacts associated with landslides, potential impacts related to liquefaction, and subsidence, to less than significant levels. (DEIR, pp. 4.6-21 through 4.6-22.)

Facts in Support of Finding: According to the geotechnical study reports prepared for the proposed improvements, the Student Center and Central Campus Infrastructure site would not be at risk for ground failure from liquefaction. However, the sites proposed for development of Parking Structure R and Tennis Courts and Parking Structure S and West Temple Avenue Pedestrian Bridge may be subject to liquefaction. Potential impacts related to liquefaction would be reduced to less than significant with implementation of MM GEO-1 and MM GEO-2. No significant slopes or embankments are within the development areas of Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, the Student Center and Central Campus Infrastructure; therefore, the potential for lateral spreading is considered negligible and no impacts would occur. Impacts related to subsidence and collapse are considered to be significant and implementation of MM GEO-2 requiring that recommendations from the geotechnical study reports be included in site preparation and building design specifications would reduce potential impacts related to subsidence and collapse to less than significant levels. Geohazard reports would be prepared to address the potential for lateral spreading, subsidence, collapse, and other geologic hazards (MM GEO-1); and recommendations in the reports would be incorporated into the structural design and construction of the Bookstore and restroom building associated with the Sand Volleyball Courts and Parking Lot W Reconstruction (MM GEO-2). Construction of the proposed Bookstore and Sand Volleyball Courts and Parking Lot W Reconstruction would also be subject to compliance with current CBC and City of Walnut grading requirements (MM GEO-3).

6. Would the project be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (Threshold 6.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Implementation of MM GEO-1 and MM GEO-2 would reduce potential impacts related to expansive soils to less than significant levels. (DEIR, pp. 4.6-22 through 4.6-23.)

Facts in Support of Finding: The geotechnical study reports prepared for the Student Center and Central Campus Infrastructure, Parking Structure R and Tennis Courts, and Parking Structure S and West Temple Avenue Pedestrian Bridge identify that the potential for encountering expansive soils varies from very low to moderate throughout the campus. Therefore, impacts are considered to be less than significant for these projects. For other

projects in the 2018 EFMP, including the proposed Bookstore and restroom building associated with Sand Volleyball Courts and Parking Lot W Reconstruction, implementation of MM GEO-1 requiring site-specific geotechnical studies to determine appropriate site and building designs and incorporation of the recommendations in the reports (MM GEO-2) would reduce potential impacts related to expansive soils to less than significant levels.

Project-Specific

Finding: Implementation of MM GEO-1 and MM GEO-2 would reduce potential impacts related to expansive soils to less than significant levels. (DEIR, pp. 4.6-23 through 4.6-24.)

Facts in Support of Finding: Laboratory testing of soils underlying Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, and the Student Center and Central Campus Infrastructure determined that on-site soils have a varied potential for expansion, from very low for the Student Center to low to moderate for the parking structures. Impacts are considered to be significant, and implementation of MM GEO-2 requiring that recommendations from the geotechnical study reports be included in site preparation and building design specifications would reduce potential impacts related to expansive soils to less than significant levels.

For the Bookstore and the restroom building associated with Sand Volleyball Courts and Parking Lot W Reconstruction, geohazard reports would have to be prepared to determine the potential for soil expansion (MM GEO-1), and the recommendations in the reports would be incorporated into the structural design and construction (MM GEO-2). Construction of the proposed Bookstore and Sand Volleyball Courts and Parking Lot W Reconstruction would also be subject to compliance with current CBC.

7. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature? (Threshold 6.6)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Implementation of MM GEO-4 would reduce potential impacts to paleontological resources to less than significant levels. (DEIR, pp. 4.6-24 through 4.6-25.)

Facts in Support of Finding: No unique geologic feature is known to exist, and no fossils have been documented on the campus. However, excavation activities associated with development of projects implementing the 2018 EFMP could encounter deposits of the Pleistocene and Holocene alluvial deposits and the Miocene Puente Formation. Excavation in these sediments could potentially impact sensitive paleontological resources in areas where surficial deposits from the Puente Formation are present or when excavations exceed 10 feet in depth in areas with Pleistocene and Holocene sediments (Qyf3 or Qof). This is a potentially significant impact. Implementation of MM GEO-4 for 2018 EFMP projects that have the potential to encounter deposits of the Pleistocene and Holocene alluvial deposits and the Miocene Puente Formation would reduce potential impacts to paleontological resources to less than significant.

Project-Specific

Finding: Implementation of MM GEO-4 would reduce potential impacts to paleontological resources to less than significant levels. (DEIR, pp. 4.6-25 through 4.6-26.)

Facts in Support of Finding: Excavation activities associated with development of the Student Center, Bookstore, and related central campus infrastructure improvements, and Parking Structure S and Pedestrian Bridge along Temple Avenue would extend into Quaternary Younger Alluvial Fan sediments (Qya3) and may encounter Quaternary Older Alluvium (Qoa) at greater depths. Deeper excavations may potentially encounter Qoa sediments and impact potentially sensitive paleontological resources. Excavations into Qya3 are unlikely to impact sensitive paleontological resources. Deeper excavations may potentially encounter Qoa sediments and impact potentially sensitive paleontological resources. Implementation of MM GEO-4 would reduce potential impacts to paleontological resources to less than significant.

Grading and excavation activities associated with development of Parking Structure R and Tennis Counts are currently in progress as part of the PEP and have been addressed in a previous EIR. No further impacts to paleontological resources are associated with this project. In addition, little to no excavation is required for construction of the Sand Volleyball Courts and Parking Lot W Reconstruction, which would be located on a site that is currently developed with a surface parking lot. No impacts to sensitive paleontological resources would occur, and no mitigation is required.

MMs:

MM GEO-1 Prior to the approval of project plans by the Division of the State Architect (DSA), a site-specific geotechnical study shall be prepared for each proposed structure. The Geotechnical Report shall be prepared by a registered Civil Engineer or certified Engineering Geologist and shall contain site-specific evaluations of the seismic and geologic hazards affecting the project and shall identify recommendations for earthwork and construction. All recommendations from forthcoming site-specific geotechnical studies shall be included in the site preparation and building design specifications. Compliance with this requirement shall be verified by the DSA as part of the project certification process, which includes review and approval of the site-specific geotechnical studies by the California Geological Survey (CGS).

MM GEO-2 Prior to the approval of project-specific plans by the Division of the State Architect (DSA), recommendations from the *Geotechnical Study Report Proposed Parking Structure at Parking Lot S Mt. San Antonio College, Walnut, California* (October 23, 2017), *Geotechnical Study Report Proposed Student Center Building, Mt. San Antonio College, 1100 North Grand Avenue, Walnut, California 91789* (October 5, 2017), and *Geotechnical Study Report Proposed Lot R Tennis and Parking Structure, Mt. San Antonio College, 1100 North Grand Avenue, Walnut, California* (December 1, 2017) prepared by Converse Consultants shall be included in the site preparation and building design specifications. Compliance with this requirement shall be verified by the DSA as part of the project certification process.

MM GEO-3 In accordance with applicable provisions in the Government Code and the Memorandum of Agreement (MOA) between the Mt. San Antonio Community College District (Mt. SAC) and the City of Walnut, Mt. SAC will consult with the City of Walnut on grading and drainage plans that require administrative review and approval by the City of Walnut's Building Official.

MM GEO-4 Prior to initiation of grading activities, the following requirements shall be incorporated on the cover sheet of the Grading Plan under the general heading "Conditions of Approval":

a. A qualified Paleontologist and Paleontological Monitor shall be present at the pre-grade meeting to consult with the grading Contractor and other consultants prior to the start of earth-moving activities occurring within paleontological sensitive sediments (Puente Formation and Quaternary older alluvial fan deposits). At the meeting, the Paleontologist shall establish procedures for paleontological resources surveillance based on the location and depths of paleontologically sensitive sediments, and shall establish, in cooperation with the Mt. SAC Project Manager, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the fossils as appropriate.

b. A qualified Paleontological Monitor shall be present at the site when grading and excavation occur in paleontologically sensitive sediments (Puente Formation and Quaternary older alluvial fan deposits). Paleontological monitoring is not required in areas where excavation occurs within non-native soils.

c. The Paleontological Monitor shall have the authority to temporarily direct, divert, or halt grading to allow recovery of paleontological resources. In areas rich in micro-vertebrates, collection of large bulk samples of matrix for later water screening to recover small bones and teeth shall be part of the paleontological salvage program.

d. Fossils recovered from the project shall be cleaned, stabilized, identified, and documented. A report on the paleontological resources recovered from the parcels shall be prepared by the Paleontologist and submitted to Mt. SAC Facilities Planning and Management.

e. Fossils with their contextual data must be deposited at a recognized museum or institution.

F. Greenhouse Gas Emissions(Section 4.7 of the Final EIR)

1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Threshold 7.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: The GHG emissions for the individual project components associated with the 2018 EFMP would all be less than the 3,000 MTCO2e/yr threshold, with implementation of MM GHG-1, which requires that all major capital projects (10,000 square feet and

above) be designed to outperform Title 24, Part 6 Energy Efficiency Standards by a minimum of 15%. (DEIR, pp. 4.7-15 through 4.7-21.)

Facts in Support of Finding: Based on the proposed construction activities described in Section 4.2, Air Quality, the principal source of construction GHG emissions would be internal combustion engines of construction equipment, on-road construction vehicles, and workers' commuting vehicles. GHG emissions from construction activities were obtained from the CalEEMod model, described above. The estimated amortized construction emissions per Mt. SAC and SCAQMD guidance is included with the operational emissions for the project-level analyses. Sources of the operational GHG emissions attributed to the Project include area, energy, mobile, water, and solid waste sources. The modeling inputs for operational emissions assume a 2027 buildout of Phases 1A and 1B, assuming the net operational uses.

The 2018 EFMP would be designed to surpass the minimum standard of a LEED "Silver" New Construction (NC) rating, and to exceed California Building Code Title 24 energy efficiency requirements by 15 percent or greater (MM GHG-1), per Mt. SAC's 2018 CAP, Green Building Standard. The LEED silver standard was not included in quantification for the operational emissions, thereby providing a conservative presentation of GHG operational impacts. CalEEMod incorporates local energy emission factors. Mitigation measures in the model are based on CAPCOA's publication Quantifying Greenhouse Gas Mitigation Measures.

As shown in Tables 4.7-3 through 4.7-7, of the Final EIR, the GHG emissions from the individual projects associated with the 2018 EFMP would be generated from energy and mobile sources. As noted above, Mt. SAC has established interim GHG thresholds related to project-level emissions from land use projects. The threshold for combined amortized construction and operational emissions is 3,000 MTCO2e/yr per project. The GHG emissions for the individual project components associated with the 2018 EFMP would all be less than the 3,000 MTCO2e/yr threshold, with implementation of MM GHG-1, which requires that all major capital projects (10,000 square feet and above) be designed to outperform Title 24, Part 6 Energy Efficiency Standards by a minimum of 15%.

MM:

MM GHG-1 All major capital projects (10,000 square feet and above) shall be designed to outperform Title 24, Part 6, Energy Efficiency Standards, by a minimum of 15%.

G. Hydrology and Water Quality (Section 4.9 of the Final EIR)

1. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality? (Threshold 9.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: Compliance with the Construction General Permit would ensure impacts to receiving waters from non-stormwater flows during construction are less than significant. Implementation of MM HYD-1, requiring the final BMP system for each individual project

on campus as part of the 2018 EFMP would be sized and the outlet structures designed to ensure that the post development stormwater runoff flows comply with the applicable requirements, would reduce potential impacts related to water quality to less than significant levels. (DEIR, pp. 4.9-12 through 4.9-15.)

Facts in Support of Finding: Construction associated with the implementation of the 2018 EFMP would primarily involve demolition/removal of existing structures, facilities, and utility infrastructure; construction of new buildings; and roadway and parking improvements. The potential impacts of construction activities, construction materials, and non-stormwater runoff on water quality during the construction phase would primarily be due to sediment and certain non-sediment-related pollutants. Compliance with the Construction General Permit, including filing an NOI, which includes preparation of an SWPPP by a Qualified SWPPP Developer, would ensure impacts to receiving waters from non-stormwater flows during construction are less than significant.

Development associated with the 2018 EFMP is expected to be a source of various pollutants entering the stormwater. Pollutants of concern for the campus, including proposed uses in the 2018 EFMP, include those expected pollutants that coincide with pollutants on the 303(d) list for receiving waters. With implementation of MM HYD-1, the final BMP system for each individual project on campus as part of the 2018 EFMP would be sized and the outlet structures designed to ensure that the post development stormwater runoff flows comply with the applicable requirements. This would occur during final design for each development project and through preparation of final Water Quality Management Plans (WQMPs) for each development project; therefore, implementation of MM HYD-1 would reduce impacts related to water quality to less than significant levels.

Project-Specific

Finding: The individual projects associated with Phases 1A and 1B would be developed in compliance with the Construction General Permit to ensure impacts to receiving waters from non-stormwater flows during construction are less than significant. In addition, the projects associated with Phases 1A and 1B of the 2018 EFMP have been determined to be exempt from hydromodification requirements since they discharge to concrete-lined channels; and thus, no adverse hydromodification impacts to natural drainage systems would occur. Water quality impacts related to the Parking Structure R and Tennis Courts project, the Parking Structure S and West Temple Avenue Pedestrian Bridge project and Student Center and Central Campus Infrastructure would be reduced to less than significant levels with implementation of MM HYD-2 requiring implementation of recommended BMPs. (DEIR, pp. 4.9-15 through 4.9-19.)

Facts in Support of Finding:

Bookstore and Sand Volleyball Courts and Parking Lot W Reconstruction

As with implementation of the 2018 EFMP, compliance with the Construction General Permit would ensure impacts to receiving waters from non-stormwater flows during construction are less than significant. No additional mitigation is required. The individual projects associated with Phases 1A and 1B of the 2018 EFMP have been determined to be exempt from hydromodification requirements since they discharge to concrete-lined

channels. Therefore, no adverse hydromodification impacts to natural drainage systems would occur.

Parking Structure R and Tennis Courts

The Parking Structure R and Tennis Courts project consists of approximately 50 percent impervious ground surface cover under existing conditions. Development of the proposed parking structure would increase the amount of impervious surface area to 85 percent. The final BMP system for Parking Structure R and Tennis Courts project would be sized and the outlet structures designed to ensure that the post development stormwater runoff and flows comply with the applicable requirements. This would occur during final design of this development project and through preparation of Final WQMPs for this specific project. Therefore, water quality impacts related to the Parking Structure R and Tennis Courts project would be reduced to less than significant levels with implementation of MM-HYD-2 requiring implementation of recommended BMPs.

Parking Structure S and West Temple Avenue Pedestrian Bridge (including associated South Temple Avenue Green Corridor Improvements)

The Parking Structure S and West Temple Avenue Pedestrian Bridge project was determined to be a Designated Project and, therefore, is required to retain 100 percent of the SWQDv on site or provide biotreatment for 1.5 times the SWQDv. Thus, the entire development site must meet the requirements of the County of Los Angeles LID Manual, regardless of existing hydrologic conditions. During Phase 1A, there would be an increase in impervious surfaces with development of Parking Structure S and West Temple Avenue Pedestrian Bridge from 67 percent to 80.8 percent. The increase in pervious surface area would result in a corresponding increase in the volume of stormwater runoff. However, LID BMPs would be implemented. The final BMP system would be sized and the outlet structures designed to ensure that the post development stormwater runoff and flows comply with the applicable requirements and would occur during final design for this development project and through preparation of Final WQMPs for this development project. Implementation of MM HYD-2 requiring implementation of recommended BMPs would reduce potential water quality impacts related to the Parking Structure S and West Temple Avenue Pedestrian Bridge project to less than significant levels.

Student Center and Central Campus Infrastructure

The final BMP system for the Student Center and Central Campus Infrastructure project would be sized and the outlet structures designed to ensure that the post development stormwater runoff and flows comply with the applicable requirements. This would occur during final design for this development project and through preparation of Final WQMPs for this development project. Therefore, water quality impacts related to the Student Center and Central Campus Infrastructure would be reduced to less than significant levels with implementation of MM HYD-2 requiring implementation of recommended BMPs.

Future development associated with implementation of the 2018 EFMP would result in an increase in impervious area and would allow for less groundwater recharge when compared to existing conditions. However, the 2018 EFMP and individual projects would incorporate permanent stormwater management features that will collectively meet the requirements set forth in the LID Manual and include treatment control BMPs as well as

source control BMPs. Due to the surface water quality regulations identified above, the 2018 EFMP would not substantially degrade groundwater quality interfere with groundwater quality.

MMs:

MM HYD-1 Prior to the issuance of grading permits, Mt. SAC shall ensure preparation of a site-specific hydrologic and water quality evaluation for each proposed development project based on the project-specific grading plan and site design for each individual project. This evaluation shall include, but not be limited to: (1) an assessment of runoff quality, volume, and flow rate from the project site; (2) identification of project-specific Best Management Practices (BMPs) (structural and non-structural) to reduce the runoff rate and volume to appropriate levels and provide treatment of surface runoff compliant with current Low Impact Design (LID) guidelines; and (3) identification of the need for new or upgraded storm drain infrastructure (on and off campus) to serve the project. Project design shall include measures to upgrade and expand campus storm drain capacity where necessary, as identified through the project-specific hydrologic evaluation. Design shall include water quality BMPs to comply with current LID guidelines as determined through the water quality evaluation. Design of future projects shall include measures to reduce runoff, including, but not limited to, the provision of permeable landscaped areas adjacent to structures to absorb runoff and the use of pervious or semi-pervious paving materials. All recommendations from forthcoming site-specific hydrologic and water quality evaluations shall be included in the site preparation and building design specifications.

MM HYD-2 Prior to the issuance of grading permits for the Bookstore, Sand Volleyball Courts and Parking Lot W Reconstruction, Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, and Student Center and Central Campus Infrastructure projects, recommendations from the *Preliminary Low Impact Development Report (LID) For Mt SAC Parking Structure [S]* (September 14, 2018) prepared by BkF, *Preliminary Low Impact Development Report (LID) For Mt. SAC Student Center* (September 27, 2018) prepared by BkF, and *Storm Water Low Impact Development (LID) Report Athletic Complex East Storm Water Improvements* (August 30, 2018) prepared by Psomas shall be included in the site preparation and building design specifications**.**

H. Noise (Section 4.11 of the Final EIR)

1. Would the project generate substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies? (Threshold 11.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: The Project average construction noise levels may be in excess of Mt. SAC's 65 dBA L_{eq} threshold at off-site sensitive receptors. Implementation of MM NOI-1 would reduce potential noise impacts from construction to less than the significance levels. (DEIR, pp. 4.11-13 through 4.11-16.)

Facts in Support of Finding: Section 4.11, Noise, including Table 4.11-7 provides the estimated noise levels attributable to the development of the 2018 EFMP are at various distances. The development of the Project would entail construction activities which include noise generated from demolition, grading/excavation, and building construction activities. Construction activities are anticipated to occur at different times and locations within the Mt. SAC campus as part of the 2018 EFMP.

As shown in Table 4.11-7, noise levels decrease substantially with distance from construction activities. Construction noise would also be generated on local roadways by workers commuting to and from the job site, construction material deliveries, and transport of soil to and from the campus. The addition of the project-generated truck traffic on these roadways would not comprise a substantial portion of the traffic along Temple Avenue and would temporarily increase noise levels by less than 1 dBA L_{eq}. The increase in overall traffic noise levels would be inaudible and would not be a substantial noise increase.

As further discussed in Section 4.11, Noise, construction activities are not anticipated to generate noise levels that have a maximum (L_{max}) of 90 dBA or greater at offsite land uses. Mt. SAC uses a screening distance of 1,500 feet from offsite land uses to establish a noise limit threshold of 65 dBA L_{eq}. A distance of 1,500 feet from offsite land uses would encompass much of the 2018 EFMP development area. Some 2018 EFMP projects would entail a construction duration of more than one year. The Project average construction noise levels may be in excess of Mt. SAC's 65 dBA L_{eq} threshold at off-site sensitive receptors. Concurrent 2018 EFMP projects that are developed in close proximity of the same offsite uses would result in greater cumulative noise exposure than the levels shown in Table 4.11-7. Thus, MM NOI-1 is included to minimize noise associated with construction activities associated with the Project, reducing noise levels through a combination of sound barriers, substitution of noisier equipment with less noisy equipment, delayed removal of existing sound barriers and use of noisier equipment to the least noise sensitive portions of the day. With implementation of MM NOI-1, impacts from construction would be reduced to levels less than the significance threshold, and would result in a less than significant noise impact.

MM:

MM NOI-1 Prior to the first grading permit, Mt. SAC shall prepare a Construction Noise Management Plan to ensure that noise levels from project-related construction activities do not exceed 65 dBA L_{eq} at off-campus uses. The Construction Noise Management Plan shall identify which construction areas could be developed concurrently such that noise from these project areas do not exceed the established noise limit. The Construction Noise Management Plan shall identify measures to reduce construction-related noise to off-campus uses, including, but not limited to:

1. Use of erected sound barriers or existing structures to minimize noise transmission.

2. Phasing of construction activities at project areas such that noisier construction phases shall not occur concurrently.

3. Phasing of concurrent project areas such that multiple construction areas shall not be located in close proximity to the same off-site use.

I. Transportation/Traffic (Section 4.14 of the Final EIR)

1. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities paths? (Threshold 14.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Implementation of the 2018 EFMP includes improvements to the pedestrian circulation network, which would facilitate walking on campus and improve access to the Transit Center and bus stops near the campus. The estimated increase in peak hour trips would not result in an impact on transit operations. Further, the increased use of these alternative transportation facilities would be consistent with policies, plans, and programs for alternative transportation systems and would not decrease the performance of these facilities. MMs TRA-3 through TRA-8 are recommended to maintain adequate emergency access to various areas at Mt. SAC and the surrounding areas during construction activities. Compliance with these requirements would reduce temporary construction-related traffic impacts to a less than significant level. (DEIR, pp. 4.1433 through 4.14-35.)

Facts in Support of Finding:

Alternative Transportation

Foothill Transit provides bus transit services in the area. Currently, five separate bus lines operate near Mt. SAC: Lines 190, 194, 289, 480, and 486, with various stops along Temple Avenue and Grand Avenue. A new Transit Center is also under construction on campus north of Temple Avenue, which would consolidate the stops on Temple Avenue. Pedestrian sidewalks, crosswalks, walkways, pathways, tunnel and bike lanes are present on and near campus, as discussed in Section 11 of the 2018 EFMP.

As stated above, the 2018 EFMP includes various pedestrian and bikeway/bike lane improvements, including improvements to the Miracle Mile pedestrian corridor, Mt. SAC Way and Bonita Drive promenades, improvements to pedestrian bridges/tunnel, Healthy Living Loop, Temple Avenue Green Corridor, Grand Avenue sidewalk completion, and Temple and Grand Avenues bicycle lane extensions to provided dedicated facilities and improve safety for pedestrian and bicyclists. These would promote alternatives to the use of the automobile through increased walking and greater use of bicycles by students, employees and visitors. While no specific bus stops or transit facilities are proposed by the 2018 EFMP, the improvements to the pedestrian circulation network would facilitate walking on campus and improve access to the Transit Center and bus stops near the campus.

Further, based on the project generated transit trips estimated using the CMP guidelines, the project is expected to generate 10 new peak hour trips in the interim year of 2021 and

26 new peak hour trips at buildout (2027). It is not anticipated that the estimated increase in peak hour trips would result in a significant impact on transit operations, as the campus is currently served by five Foothill Transit routes. In addition, the increased use of these alternative transportation facilities would be consistent with policies, plans, and programs for alternative transportation systems and would not decrease the performance of these facilities.

Construction-Related Traffic

The Project would generate temporary trips associated with construction activities, as described in Section 3.0, Project Description, of the Final EIR, which would be considered a potentially significant impact. Construction associated with the implementation of the 2018 EFMP would primarily involve demolition/removal of existing structures, facilities, and utility infrastructure; construction of new buildings; and roadway and parking improvements. Construction-related traffic would primarily be associated with delivery of building materials and construction equipment; export of soil and import of sand; removal of demolition and construction debris; and construction workers commuting to and from the project site. The amount of construction traffic would vary daily depending on the nature of the activity and would occur during off-peak hours, as further discussed below. In general, phased construction of the proposed uses is not anticipated to result in substantial daily construction-related trip volumes, including heavy truck trips.

During construction, partial or full closures of streets, sidewalks, cross walks, pathways, and/or bike lanes may occur, which could obstruct emergency access to various buildings and facilities on campus. Construction activities would be temporary, staggered, and located at scattered locations that would not affect other areas of the campus. Compliance with the Work Area Traffic Control Handbook ("WATCH") would include notification of emergency service providers of planned construction activities, closures and detours; a traffic control plan to maintain access to nearby land uses and facilities; and use of signs and flag persons to redirect traffic around the construction site. MMs TRA-3 through TRA-8 are recommended to maintain adequate emergency access to various areas at Mt. SAC and the surrounding areas during construction activities. These MMs would limit interference to vehicular movement along Temple Avenue and Grand Avenue to one side of the road so as to maintain emergency access along these roadways and would ensure that emergency access to on-campus areas and surrounding land uses would be maintained at all times.

Compliance with these requirements would reduce temporary construction-related traffic impacts to a less than significant level.

2. Would the project result in inadequate emergency access? (Threshold 14.4)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Access to the Mt SAC is provided by Grand Avenue and Temple Avenue and various internal roads on campus. During construction, partial or full closures of streets, sidewalks, cross walks, pathways, and/or bike lanes may occur, which could obstruct emergency access to various buildings and facilities on campus. With implementation of MMs TRA-3 through TRA-8, which would maintain adequate emergency access to various areas at Mt. SAC and the surrounding areas during construction activities, no adverse

long-term impacts to emergency access would occur. Short-term impacts related to emergency access would be less than significant after mitigation. (DEIR, pp. 4.14-36 through 4.14-37)

Facts in Support of Finding: Emergency access to Mt SAC is provided by Grand Avenue and Temple Avenue and various internal roads on campus. The 2018 EFMP and Phase 1A and 1B projects proposes the construction and improvement of various facilities and site improvements, which would be subject to review by the Division of the State Architect and the State Fire Marshal and the local fire authority (Los Angeles County Fire Department) for structural safety, fire and life safety, and access requirements. This includes the provision of adequate emergency access to individual facilities on campus. Additionally, a new emergency access route connecting Bonita Drive to the southern campus boundary is proposed as part of the 2018 EFMP.

During construction, partial or full closures of streets, sidewalks, cross walks, pathways, and/or bike lanes may occur, which could obstruct emergency access to various buildings and facilities on campus. Construction activities would be temporary, staggered, and located at scattered locations that would not affect other areas of the campus. Compliance with the WATCH would include notification of emergency service providers of planned construction activities, closures and detours; a traffic control plan to maintain access to nearby land uses and facilities; and use of signs and flag persons to redirect traffic around the construction site. MMs TRA-3 through TRA-8 are recommended to maintain adequate emergency access to various areas at Mt. SAC and the surrounding areas during construction activities. No adverse long-term impacts to emergency access would occur. Short-term impacts related to emergency access would be less than significant after mitigation.

MMs:

Construction

MM TRA-3 Construction Contractors shall submit an application for a Truck Hauling Plan to Mt. SAC Facilities Planning and Management and the City of Walnut for review and approval prior to the start of any grading, demolition, or construction activities, in compliance with Title 2, Chapter 2.40, Hauling of Earth Materials, of the Walnut Municipal Code. The Contractor shall comply with the conditions of the permit, including designated haul routes, time limits for hauling operations, debris on City roadways, temporary signage requirements, and other restrictions.

MM TRA-4 Construction contractors shall submit Traffic Control Plans and other construction documents that show compliance with the Work Area Traffic Control Handbook (WATCH) to Mt. SAC Facilities Planning and Management. The Traffic Control Plan shall be implemented by the Contractor throughout the construction phase of each project. This shall include the use of signs and flag persons during truck hauling activities and heavy equipment movement outside the construction site and notification of the City of Walnut, the Los Angeles County Fire Department, and the Los Angeles Sheriff's Department of planned changes in vehicle circulation

patterns, street closures, detours, parking, and other traffic and access issues.

MM TRA-5 For any construction work on public rights-of-way, the Contractor shall obtain an encroachment permit from the City of Walnut, shall provide a copy of the permit to the Mt. SAC Project Manager, and shall comply with the conditions of the permit, including restoration of roadways and public improvements, time limits for construction, debris on City roadways, and other restrictions.

MM TRA-6 For any temporary street, sidewalk, walkway, and/or bike lane closure, the construction Contractor shall submit plans to Mt. SAC Facilities Planning and Management to maintain pedestrian access on adjacent sidewalks and ensure vehicle, pedestrian, and bicyclist safety along the construction site perimeter and along construction equipment and haul routes on campus.

MM TRA-7 Construction Contractors shall submit construction staging area and parking plans to the Mt. SAC Project Manager. Construction staging ares and construction worker parking areas shall be designated at specific locations on campus and shall avoid public rights-of-way internal roads, sidewalks, walkways, and bike paths/bike lanes, unless approved by Mt. SAC Facilities Planning and Management.

MM TRA-8 Construction Contractors shall submit temporary fencing plans to the Mt. SAC Project Manager. Construction sites shall be surrounded by temporary fencing to secure construction equipment, prevent vehicle and pedestrian access and trespassing, and reduce hazards during grading, demolition, or construction activities.

J. Tribal Cultural Resources (Section 4.15 of the Final EIR)

1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? (Threshold 15.2)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Therefore, based on coordination to date, Native American representatives have not provided substantial documentation supporting that there are resources that are significant to a California Native American tribe. Notwithstanding the current lack of evidence of known tribal cultural resources on campus, it is acknowledged Native Americans inhabited this portion of Los Angeles County. Although no archaeological

resources important to Native Americans have been identified near the campus, there is always the possibility that undiscovered intact cultural resources, including tribal cultural resources may be present below the surface in native sediments. MM TCR-1 is recommended to provide for Native American monitoring of any grading activities in which native soil is disturbed. (DEIR, pp. 4.15-7 through 4.15-9.)

Facts in Support of Finding:

Based on information available through the record searches at the SCCIC and the NAHC, and the long-term past use of the Mt. SAC campus for educational purposes, there is no information available that indicates there are significant tribal resources on campus that would be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. However, Mt. SAC requested consultation with tribes that notified Mt. SAC of a desire to be consulted with regarding projects on the campus.

The campus lies within an area where ancestral territories of Kizh Gabrieliño Tribe villages adjoined and overlapped, at least during the Late Prehistoric (i.e., before European contact) and Protohistoric Periods (i.e., Post-contact). It was also revealed that several artifacts (i.e. manos and metates) were discovered on the campus during the 1970s; however, to date, the tribe has not provided documentation that supports the identification of cultural resources on the campus.

Although no archaeological resources important to Native Americans have been identified near the campus, there is always the possibility that undiscovered intact cultural resources, including tribal cultural resources may be present below the surface in native sediments.

MMs:

MM TCR-1 Prior to the commencement of any grading activities in which native soil is disturbed, Mt. SAC shall ensure that a Native American monitor has been retained to observe grading activities in native sediment and to salvage and catalogue tribal cultural resources as necessary. The Native American monitor shall be present at the pre-grading conference, shall establish procedures for tribal cultural resource surveillance, and shall establish, in cooperation with Mt. SAC, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the tribal cultural resource as appropriate. If the tribal cultural resources are found to be significant, the Native American observer shall determine appropriate actions, in cooperation with Mt. SAC, for exploration and/or recovery. Tribal Cultural Resource monitoring is not required in areas where excavation occurs within non-native soils.

VIII. FINDINGS REGARDING IMPACTS DETERMINED TO BE SIGNIFICANT AND UNAVOIDABLE

The Final EIR determined that the Project would result in significant and unavoidable impacts for two impact categories (cultural resources and traffic) with the incorporation of project-level MMs. MMs will be implemented pursuant to the Mitigation Monitoring Program ("MMP") prepared for the Project.

A. Cultural Resources (Section 4.4 of the Final EIR)

1. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (Threshold 4.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2)

Finding: The 2018 EFMP would result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant direct impact pursuant to CEQA Section 15064.5. MM CULT-1 would be implemented to reduce this significant impact to the Mt. SAC Historic District. However, even with of MM CULT-1, the loss of contributing resources to the Mt. SAC Historic District, and therefore the loss of the historic district, is a significant and unavoidable impact resulting from the 2018 EFMP. (DEIR, pp. 4.4-17 through 4.4-22.)

Facts in Support of Finding: The demolition of the buildings that contribute to the Mt. SAC Historic District (as identified in Table 4.4-3, Section 4.4, Cultural Resources of the Final EIR) results in the potential to cause an adverse direct impact because implementation of the 2018 EFMP results in the complete loss of contributing resources to a historic district (refer to Exhibit 4.4-1). As such, the 2018 EFMP would result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant direct impact pursuant to CEQA Section 15064.5. MM CULT-1 below requires the completion of HABS documentation for remaining buildings in the Historic District to reduce this significant impact to the Mt. SAC Historic District. The HABS documentation would augment the prior HABS documentation that has been prepared for campus. Additionally, MM CULT-2 requires establishment of an interpretive display for the Mt. SAC Historic District. However, even with preparation of the HABS documentation and establishing of an interpretive display, the loss of contributing resources to the Mt. SAC Historic District, and therefore the loss of the historic district, is a significant and unavoidable impact resulting from the 2018 EFMP.

Project-Specific

Finding: the demolition of buildings that are contributing resources to the Mt. SAC Historic District would result in potentially significant and unavoidable impact. MM CULT 1 and MM CULT-2 are applicable to the Student Center and Central Campus Infrastructure project, but even with implementation of these MMs, the impact to the Mt. SAC Historic District would remain significant and unavoidable. Impacts would be less than significant for the Parking Structure R and Tennis Courts and Sand Volleyball Courts and Parking Lot W Reconstruction projects. (DEIR, pp. 4.4-22 through 4.4-23.)

Facts in Support of Finding:

Student Center and Central Campus Infrastructure and Bookstore

As identified in Table 4.4-3, of the Final EIR the Student Center and Central Campus Infrastructure project, which are expected to be constructed during Phase 1A, would involve demolition of buildings that contribute to the Mt. SAC Historic District. Specifically, demolition of Buildings 17, 18, 19A, 19B, and 20 is required. The buildings demolished for these projects would also accommodate construction of the Bookstore (Phase 1B). As identified in Section 4.4, Cultural Resources, of the Final EIR, the demolition of buildings that are contributing resources to the Mt. SAC Historic District would result in potentially significant and unavoidable impact. MM CULT-1 and MM CULT-2 are applicable to the Student Center and Central Campus Infrastructure project, but even with implementation of these MMs, the impact to the Mt. SAC Historic District would remain significant and unavoidable.

With respect to indirect visual impacts, the three-level, approximately 105,000-gross-square-foot ("gsf") Student Center and three-level approximately 45,000-gsf Bookstore are located in the center of the historic district and would create a visual interruption of the mid-ground views from contributing resources in the historic district (specifically Buildings 10, 11, and 26ABCD, which would be retained). The new Student Center and Central Campus Infrastructure and Bookstore would also impact the historic district's integrity of setting, feeling, or association. The Student Center and Central Campus Infrastructure and Bookstore would result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant indirect impact pursuant to CEQA Section 15064.5.

Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, Sand Volleyball Courts and Parking Lot W Reconstruction

The Parking Structure R and Tennis Courts, Parking Structure S and West Temple Avenue Pedestrian Bridge, and the Sand Volleyball Courts and Parking Lot W Reconstruction are located in the southern portion of the campus, south of Temple Avenue. These projects would not involve the demolition or renovation of any buildings that contribute to the Mt. SAC Historic District.

Additionally, these projects would not result in a visual impact related to the historic district. Their design would be compatible with the character-defining features of the historic district. The overall impact to the historic district's integrity of setting, feeling, or association as a whole is minimal; there is no impact on the historic district's integrity of location, design, materials, and workmanship. As such, these projects would not result in any adverse indirect visual impacts pursuant to CEQA Section 15064.5.

MMs:

MM CULT-1 Historic American Buildings Survey (HABS) documentation shall be implemented to reduce the significant impact on contributing resources to the Mt. SAC Historic District. An augment to the prior HABS documentation package shall be prepared to include all contributing resources within the Historic District not previously recorded. Specifically HABS documentation

shall be prepared for Buildings 4, 7, 10, 11, 19A, 26A, 26B, 26C, 26D, 47, 48, F1, F2A, F2B, F3A, F4A, F5A, F7, G2, and the Wildlife Sanctuary:

- **HABS Level II Narrative Historical Report.** As HABS documentation has been prepared for the historic district, this report would serve as an addendum to the extant documentation prepared consistent with *Historic American Buildings Survey Guidelines for Historical Reports* (National Park Service 2007). Prior to the demolition or renovation of resources contributing to the Mt. SAC Historic District, the college shall enlist the services of a qualified Architectural Historian to prepare an Addendum HABS Narrative Historical Report, as well as California Department of Parks and Recreation (CA DPR) 523 forms, that documents all contributing resources that were not previously documented. Documentation through HABS is an important measure because it allows documentation of the resource before alterations begin. Given the relative historic significance of the resources, Level II HABS is the recommended documentation standard, to be prepared in accordance with the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation* and HABS specific guidelines. A narrative historical report following the *Historic American Buildings Survey Guidelines for Historical Reports* (National Park Service 2007) should be prepared for the adversely impacted resources. All historic documents shall be made available to the public in the collection of Mt. SAC's Library/Learning Technology Center.
- **HABS Level II Large-format Photographs.** A qualified HABS photographer shall provide photo-documentation that documents all contributing resources that were not previously documented. The photo-documentation shall be made available to the public in the collection of the Mt. SAC's Library/Learning Technology Center. The documentation shall be done in accordance with the Guidelines provided in the *Photographic Specifications: Historic American Building Survey, Historic American Engineering Record, Division of National Register Programs, National Park Service, Western Region*.
- **HABS Level II Reproduction of select existing drawings (if available).** Mt. SAC shall prepare archivally stable reproduction of original as-built drawings for all contributors that were not previously included in the HABS documentation. Reproductions of drawings shall be done in accordance with the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. Select existing drawings, where available, may be photographed with large-format negatives or photographically reproduced on Mylar or Vellum in accordance with the U.S. Copyright Act, as amended.

MM CULT-2 Prior to demolition of any additional buildings that are contributors to the Mt. SAC Historic District, to recognize the history of Mt. SAC, interpretive sign(s) shall be established in one or adjacent to one of the major buildings in the historical heart of the campus, such as the new Library/Learning Resources or Student Center. The interpretative panels could utilize information from the HABS Level II Narrative Historical Report and large-

format photographic documentation, as well as historical views of the campus.

B. Traffic (Section 4.14 of the Final EIR)

1. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities paths? (Threshold 14.1)

2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2) and Project-Specific

Finding: Implementation of MM TRA-1 would reduce the project impact to a less than significant level for nine of the 12 intersections for the Existing Plus Project traffic impacts. In addition, implementation of MM TRA-1 would reduce the project impact to a less than significant level, for eight of the nine intersections for the Interim Year (2021). However, the implementation of the identified improvements is subject to the approval of the cities of Walnut, Pomona, and West Covina as well as the County of Los Angeles. While Mt. SAC would work with these jurisdictions to implement the recommended improvements, Mt. SAC does not have the legal ability to compel these agencies to implement the improvements needed to mitigate this impact to a level of insignificance. Therefore, the impacts would be significant and unavoidable. Further, implementation of MM TRA-1 and MM TRA-2 would reduce impacts to a less than significant level for 11 of the 15 intersections for the 2018 Educational and Facilities Master Plan (Phases 1A, 1B, and 2.) However, the implementation of the identified improvements is subject to the approval of the cities of Walnut, Pomona, and West Covina as well as the County of Los Angeles. While Mt. SAC would work with these jurisdictions to implement the recommended improvements, Mt. SAC does not have the legal ability to compel these agencies to implement the improvements needed to mitigate this impact to a level of insignificance. Therefore, impacts would be significant and unavoidable. (DEIR, pp. 4.14-19 through 4.14-33.)

Facts in Support of Finding:

Existing Plus Project Traffic Impacts

Intersection Impacts

The Existing Plus Project LOS analysis was prepared using ICU and HCM for the 2018 EFMP (The intersections which would operate at LOS E or worse are the same as those listed in Section 4.14.3, Existing Setting). Further, the intersection of San Jose Hills Road and Grand Avenue, already operating at LOS E in the AM peak hour, would deteriorate from LOS D to LOS E in the PM peak hour. Figures 18A and 18B of the TIA in Appendix J of the Final EIR show the existing plus project traffic volumes.

Caltrans Segments

For the Caltrans intersections, a significant impact can only occur if the intersection is operating at LOS E or F. For existing conditions plus project, the volumes and LOS on the Caltrans study segments include:

- I-10, Citrus Street to Holt Avenue
    - 1,869 passenger cars pc/hr/ln, LOS D
- SR-57, Grand Avenue to SR-60
    - 797 pc/hr/ln, LOS B

For the Caltrans study segments, both are expected to operate at LOS D or better with the project; and therefore, no mitigation is required.

Non-Caltrans Segments

Traffic conditions at study area intersections under Existing Plus Project scenario, which include the LOS for existing and existing plus project conditions as well as the increase in ICU for the non-Caltrans intersections with the project, are shown in Table 4.14-7 of the Final EIR. Although operational information is provided for unsignalized intersections, projects are not considered to have a significant impact on any unsignalized intersections. However, as discussed in Section 4.14, Traffic, a preliminary peak hour signal warrant evaluation was conducted for unsignalized intersections which are expected to operate at LOS E or F. As shown in Table 4.14-7 of the Final EIR, two unsignalized intersections are shown to operate at LOS E or F under existing and existing plus project conditions; the intersections of Cortez Street/Grand Avenue and Cameron Avenue/Barranca Street are expected to operate at LOS E or F under existing and existing plus project conditions. Because of the existing southbound right turn lane on Grand Avenue at Cortez Street, the right turn volume was not included in the total volume at that intersection. The intersection of Cameron Avenue and Barranca Street is expected to meet the peak hour signal warrant, while the intersection of Cortez Street and Grand Avenue is not (due to the low volumes on Cortez Street).

As shown in Table 4.14-8, of the Final EIR, implementation of MM TRA-1, requiring payment of fair share contributions toward various circulation improvements, would reduce the project impact to a less than significant level for nine of the 12 intersections. However, the implementation of the identified improvements is subject to the approval of the cities of Walnut, Pomona, and West Covina as well as the County of Los Angeles. While Mt. SAC would work with these jurisdictions to implement the recommended improvements, Mt. SAC does not have the legal ability to compel these agencies to implement the improvements needed to mitigate this impact to a level of insignificance. Thus, the impacts would be significant and unavoidable.

In addition, implementation of travel demand management ("TDM") strategies included as part of the 2018 EFMP such as construction of the Transit Center on campus, along with complementary programs (i.e. bike storage, bike share, etc.), may help shift student, staff, and faculty trips from personal vehicles to transit and thus, reduce campus vehicular traffic. These reductions may help reduce the project traffic overall; and therefore, further reduce the project impacts at study area intersections. However, even with implementation

of TDM strategies, the project impacts at study area intersections would continue to be significant and unavoidable.

Interim Year (2021)

2021 Cumulative Condition Without the Project

Intersection Analysis

The 2021 cumulative conditions without the project were evaluated using the ICU and HCM. The ICU and HCM reports for 2021 cumulative without the project conditions are included in Appendix C of the TIA included in Appendix J of the Final EIR. Table 4.14-9, Interim (2021) Cumulative Plus Project Impacts Analysis, shows the resulting LOS for each of the study intersections under 2021 Cumulative Conditions Without the Project. The analysis of intersection LOS for the Year 2021 Cumulative Conditions Without the Project traffic analysis scenario considers the LOS in 2018 with the addition of traffic from any potential development projects located in the region of influence as discussed previously.

As shown in Table 4.14-9 of the Final EIR, nine intersections would operate at LOS E or worse. These included all nine intersections operating at LOS E or worse under Table 4.14-3, Existing Traffic Conditions. In addition, the worst minor-street (stop controlled) movement at the intersection of Cortez Street and Grand Avenue (intersection 19) would operate at LOS E or worse in both peak hours as well as at the intersection of Cameron Avenue and Barranca Street (intersection 20) in the AM peak hour.

For two-way stop-controlled intersections (such as Cortez Street/Grand Avenue and Cameron Avenue/Barranca Street), there is no defined intersection LOS.

In addition to the study intersections, the two study Caltrans segments were also evaluated for 2021 cumulative conditions:

- I-10, Citrus Street to Holt Avenue
    - 1,868 pc/hr/ln, LOS D
- SR-57, Grand Avenue to SR-60
    - 792 pc/hr/ln, LOS B

2021 Cumulative Plus Project Conditions

Intersection Analysis

Under 2027 conditions, the interim study year is at the completion of Phase 1A (year 2021). The 2021 cumulative conditions plus the project; was evaluated using the ICU and HCM. The ICU and HCM reports for 2021 cumulative plus project conditions are included in Appendix C of the TIA included in Appendix J of the Final EIR.

Caltrans Segments

As discussed previously, for the Caltrans intersections, a significant impact can only occur if the intersection is operating at LOS E or F without project traffic. The two study Caltrans segments were also evaluated for 2021 cumulative plus project conditions as described under the 2021 Cumulative Conditions Without the Project analysis and would operate at the same LOS as without the project.

- I-10, Citrus Street to Holt Avenue
    - 1,873 pc/hr/ln, LOS D
- SR-57, Grand Avenue to SR-60
    - 795 pc/hr/ln, LOS B

Both Caltrans study segments, are expected to operate at LOS D or better with the project; and therefore, no mitigation is required.

Non-Caltrans Segments

The increase in ICU for the non-Caltrans intersections due to the project traffic is shown in Table 4.14-9, of the Final EIR, which indicates the resulting level of service for each of the study intersections for 2021 cumulative plus project conditions. As shown in Table 4.14-9, of the Final EIR, nine intersections would operate at LOS E or worse. These included all nine intersections operating at LOS E or worse under Table 4.14-3, Existing Traffic Conditions.

Further, as seen in Table 4.14-9, of the Final EIR, the intersections of Cortez Street/Grand Avenue and Cameron Avenue/Barranca Street are expected to operate at LOS E or F under existing and existing plus project conditions and therefore, the peak hour signal warrant (warrant 3 of the Manual on Uniform Traffic Control Devices [MUTCD]) was evaluated. As discussed previously the Cameron Avenue/Barranca Street intersection is expected to meet the signal warrant, while the intersection of Cortez Street and Grand Avenue is still not expected to meet the signal warrant due to the low volumes on Cortez Street.

Table 4.14-10, of the Final EIR, indicates that implementation of MM TRA-1, requiring payment of fair share contributions toward various circulation improvements, would reduce the project impact to a less than significant level for eight of the nine intersections. However, the implementation of the identified improvements is subject to the approval of the cities of Walnut, Pomona, and West Covina as well as the County of Los Angeles. While Mt. SAC would work with these jurisdictions to implement the recommended improvements, Mt. SAC does not have the legal ability to compel these agencies to implement the improvements needed to mitigate this impact to a level of insignificance. Therefore, the impacts would be significant and unavoidable.

As discussed previously, implementation of travel demand management (TDM) strategies included as part of the 2018 EFMP such as construction of the Transit Center on campus, along with complementary programs (i.e. bike storage, bike share, etc.), may help shift student, staff, and faculty trips from personal vehicles to transit and thus, reduce campus vehicular traffic. These reductions may help reduce the project traffic overall; and therefore, further reduce the project impacts at study area intersections. However, even

with implementation of TDM strategies, the project impacts at study area intersections would continue to be significant and unavoidable.

Buildout Year 2027

2027 Cumulative Conditions Without the Project

Intersection Analysis

As previously discussed, the non-Caltrans signalized intersections were evaluated using the ICU methodology, and the unsignalized intersections and Caltrans signalized intersections were evaluated using the HCM methodology. The analysis of intersection LOS for the Year 2027 Cumulative Conditions Without the Project traffic analysis scenario considers the LOS in 2027 with the addition of traffic from any potential development projects located in the region of influence as discussed previously.

Ten intersections operate at LOS E or worse for 2027 cumulative conditions without the project in one or both peak hours as shown in Table 4.14-11, of the Final EIR, includes the following intersections:

1. Amar Road/Nogales Street (AM peak hour)
4. Temple Avenue/Grand Avenue (AM peak hour)
10. Temple Avenue/Campus Drive (AM peak hour)
12. Temple Avenue/Valley Boulevard (AM peak hour)
13. Temple Avenue/Pomona Boulevard (AM and PM peak hours)
18. Holt Avenue/Grand Avenue (AM peak hour)
21. Cameron Avenue/Grand Avenue (AM peak hour)
23. San Jose Hills Road/Grand Avenue (AM and PM peak hours)
24. La Puente Road/Grand Avenue (AM and PM peak hours)
25. Valley Boulevard/Grand Avenue (AM peak hour)

In addition, the worst minor-street (stop controlled) movement at the intersection of Cortez Street and Grand Avenue (intersection 19) would operate at LOS E or worse in both peak hours as well as at the intersection of Cameron Avenue and Barranca Street (intersection 20) in the AM peak hour. Recall that for two-way stop-controlled intersections (such as Cortez Street/Grand Avenue and Cameron Avenue/Barranca Street), there is no defined intersection LOS. In addition to the study intersections, the two study Caltrans segments were evaluated for 2021 cumulative conditions:

- I-10, Citrus Street to Holt Avenue
    - 1,868 pc/hr/ln, LOS D
- SR-57, Grand Avenue to SR-60
    - 792 pc/hr/ln, LOS B

2027 Cumulative Plus Project Conditions

Intersection Analysis

Under 2027 conditions, the full buildout of the 2018 EFMP is assumed, consistent with the 10-year horizon for buildout of Phase 2 of the 2018 EFMP. Similar to the 2027 Cumulative without Project analysis, the non-Caltrans signalized intersections were evaluated using the ICU methodology, and the unsignalized intersections and Caltrans signalized intersections were evaluated using the HCM methodology, assuming full buildout of the project. The ICU and HCM reports for 2027 cumulative plus project conditions are included in Appendix D of the TIA.

Caltrans Segments

As discussed previously, for the Caltrans intersections, a significant impact can only occur if the intersection is operating at LOS E or F without project traffic. The two study Caltrans segments were evaluated for 2027 cumulative plus project conditions:

- I-10, Citrus Street to Holt Avenue
    - 1,705 pc/hr/ln, LOS D
- SR-57, Grand Avenue to SR-60
    - 889 pc/hr/ln, LOS B

For the Caltrans study segments, both are expected to operate at LOS D or better with the project; therefore, no mitigation is required

Non-Caltrans Segments

Table 4.14-11, of the Final EIR, shows the resulting level of service for each of the study intersections for 2027 cumulative plus project conditions. The intersections which would operate at LOS E or worse under the 2027 Cumulative Conditions Without the Project would continue to operate at LOS E or worse for 2027 Cumulative Plus Project Conditions. Further, both Temple Avenue/Grand Avenue and San Jose Hills/Grand Avenue intersections will deteriorate from LOS E to LOS F in the AM peak hour and the intersection of Temple Avenue and University Drive would deteriorate from LOS D to LOS E in the AM peak hour. Further, Table 4.14-11 shows the increase in ICU for the non-Caltrans intersections with the project. As shown in the Table 4.14-11, of the Final EIR, 15 intersections have a significant impact for 2027 cumulative plus project conditions.

As seen in Table 4.14-11, of the Final EIR, the intersections of Cortez Street/Grand Avenue and Cameron Avenue/Barranca Street are expected to operate at LOS E or F under buildout (2027) cumulative conditions, with and without the project. Therefore, the peak hour signal warrant (warrant 3 of the MUTCD) was evaluated. Since the Cameron Avenue/Barranca Street intersection met the warrant for existing plus project conditions, it was not reevaluated for this condition. In addition, as shown in Figure 21 of the TIA, the intersection of Cortez Street and Grand Avenue is still not expected to meet the signal warrant due to the low volumes on Cortez Street.

Table 4.14-11, of the Final EIR, indicates eight intersections would have significant traffic impacts that require mitigation at the end of Project buildout. However, implementation of

the improvements outlined in Mitigation Measure TRA-1, requiring payment of fair share contributions toward various circulation improvements, would reduce the traffic impacts of the Project after buildout to less than significant levels except for the intersections at Amar Road and Nogales Street and Amar Road and Meadow Road (as shown in Table 4.14-12 of the Final EIR).

As shown in Table 4.14-12, of the Final EIR, implementation of MM TRA-1 and MM TRA-2, requiring payment of fair share contributions toward various circulation improvements, would reduce impacts to a less than significant level for 10 of the 15 intersections. However, the implementation of the identified improvements is subject to the approval of the cities of Walnut, Pomona, and West Covina as well as the County of Los Angeles. While Mt. SAC would work with these jurisdictions to implement the recommended improvements, Mt. SAC does not have the legal ability to compel these agencies to implement the improvements needed to mitigate this impact to a level of insignificance. Therefore, impacts would be significant and unavoidable.

In addition, as discussed previously, implementation of travel demand management ("TDM") strategies included as part of the 2018 EFMP such as construction of the Transit Center on campus, along with complementary programs (i.e. bike storage, bike share, etc.), may help shift student, staff, and faculty trips from personal vehicles to transit and thus, reduce campus vehicular traffic. These reductions may help reduce the project traffic overall; and therefore, further reduce the project impacts at study area intersections. However, even with implementation of TDM strategies, the project impacts at study area intersections would continue to be significant and unavoidable.

MMs:

Existing Plus Project

MM TRA-1 Prior to the completion of new construction under the 2018 EFMP, Mt. SAC shall be responsible for fair share contributions towards the installation of the following improvements:

4. Temple Avenue and Grand Avenue

- Convert the eastbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third eastbound thru lane on the east leg of the intersection.
- Convert the westbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third westbound thru lane on the west leg of the intersection.

9. Temple Avenue and University Drive

- Convert the westbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third westbound thru lane on the west leg of the intersection.

10. Temple Avenue and Campus Drive

- Convert the westbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third westbound thru lane on the west leg of the intersection.

11. Kellogg Drive and Campus Drive

- Convert the shared eastbound thru-right turn lane to an exclusive right turn lane. This will only require restriping on the eastbound approach.

12. Temple Avenue and Valley Boulevard

- Add a second northbound left turn lane. This will require restriping of both the north and south legs of the intersection (no physical reconstruction) and may result in the loss of some parking spaces along Valley Boulevard, south of Temple Avenue.

13. Temple Avenue and Pomona Boulevard

- Convert the southbound lanes to provide two exclusive left turn lanes and a shared thru-right turn lane. This will require restriping on the southbound approach and the removal of the existing "right lane must turn right" and "right turn only" signs.

18. Holt Avenue and Grand Avenue

- Convert the southbound right turn lane to a shared thru-right turn lane. This will require additional striping on the south leg to either extend the right turn lane at Virginia Avenue north to Holt Avenue to act as a trap right turn lane (where drivers in that lane will be forced to turn right at Virginia Avenue), or to convert the lane to a shared thru-right turn lane at Virginia Avenue. Some physical improvements, including the removal of the existing raised median island and relocation of the signal pole, will also be needed for the northwest corner of the Holt Avenue/Grand Avenue intersection.

21. Cameron Avenue and Grand Avenue

- Add a second eastbound right turn lane.

23. San Jose Hills Road and Grand Avenue

- Convert the westbound thru lane to a shared thru-left turn lane. This will only require striping, no physical reconstruction.
- Convert the northbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third northbound thru lane on the north leg of the intersection.

24. La Puente Road and Grand Avenue

- Modify the signal phasing to include an eastbound right turn overlap.

2027 Full Buildout

MM TRA-2 Prior to the completion of new construction under the 2018 EFMP, Mt. SAC shall be responsible for fair share contributions towards the installation of the following improvements:

1. Amar Road and Nogales Street

- Convert the eastbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third eastbound thru lane on the east leg of the intersection.

5. Temple Avenue and Mt. SAC Way

- Convert the westbound right turn lane to a shared thru-right turn lane. This will not require any physical reconstruction but will require additional striping to provide a third westbound thru lane on the west leg of the intersection.

Construction

MM TRA-3 Construction contractors shall submit an application for a Truck Hauling Plan to Mt. SAC Facilities Planning and Management and the City of Walnut for review and approval prior to the start of any grading, demolition, or construction activities, in compliance with Title 2, Chapter 2.40, Hauling of Earth Materials, of the Walnut Municipal Code. The Contractor shall comply with the conditions of the permit, including designated haul routes, time limits for hauling operations, debris on City roadways, temporary signage requirements, and other restrictions.

MM TRA-4 Construction Contractors shall submit Traffic Control Plans and other construction documents that show compliance with the Work Area Traffic Control Handbook (WATCH) to Mt. SAC Facilities Planning and Management. The Traffic Control Plan shall be implemented by the Contractor throughout the construction phase of each project. This shall include the use of signs and flag persons during truck hauling activities and heavy equipment movement outside the construction site and notification of the City of Walnut, the Los Angeles County Fire Department, and the Los Angeles Sheriff's Department of planned changes in vehicle circulation patterns, street closures, detours, parking, and other traffic and access issues.

MM TRA-5 For any construction work on public rights-of-way, the Contractor shall obtain an encroachment permit from the City of Walnut, shall provide a copy of the permit to the Mt. SAC Project Manager, and shall comply with the conditions of the permit, including restoration of roadways and public improvements, time limits for construction, debris on City roadways, and other restrictions.

MM TRA-6 For any temporary street, sidewalk, walkway, and/or bike lane closure, the construction Contractor shall submit plans to Mt. SAC Facilities Planning

and Management to maintain pedestrian access on adjacent sidewalks and ensure vehicle, pedestrian, and bicyclist safety along the construction site perimeter and along construction equipment and haul routes on campus.

MM TRA-7 Construction Contractors shall submit construction staging area and parking plans to the Mt. SAC Project Manager. Construction staging areas and construction worker parking areas shall be designated at specific locations on campus and shall avoid public rights-of-way, internal roads, sidewalks, walkways, and bike paths/bike lanes, unless approved by Mt. SAC Facilities Planning and Management.

MM TRA-8 Construction Contractors shall submit temporary fencing plans to the Mt. SAC Project Manager. Construction sites shall be surrounded by temporary fencing to secure construction equipment, prevent vehicle and pedestrian access and trespassing, and reduce hazards during grading, demolition, or construction activities.

IX. FINDINGS REGARDING CUMULATIVE IMPACTS

A. Aesthetics

Based on the cumulative project's list provided in Table 4-1, no cumulative projects would be in the same viewshed as the Project; the nearest cumulative project is approximately 1.5 miles away from the campus. Development on campus and in the vicinity of the campus has previously resulted in changes to the visual character of the area through alterations to the natural terrain and the construction of structures. Although previous and future development would alter the visual character of the area, mitigation set forth for the respective development projects; compliance with applicable provisions of the City of Walnut's Zoning Ordinance that address visual resources; and implementation of the comprehensive programs for the preservation of open space have mitigated potential aesthetic impacts to the extent feasible. It is also important to note that the San Jose Hills, located north and east of the campus, are designated open space areas; and the visual character of these areas would not be altered with implementation of the Project or any future development planned in the City.

The 2018 EFMP does not result in impacts to key visual features that have been preserved as open space. The Project would not substantially alter the physical topography of the area, nor would it degrade any scenic vistas, highways, or areas considered to be scenic resources. Therefore, the aesthetic impacts associated with the Project would be less than significant. The 2018 EFMP would not result in a cumulatively considerable contribution to a significant aesthetic impact related to scenic resources or visual character.

The 2018 EFMP, along with other future development in the City of Walnut, would involve the installation of exterior lighting for safety and security in compliance with the City requirements and, consequently, could result in the creation of new sources of substantial light or glare that could affect day or nighttime views. As with typical urban environments, the campus and surrounding areas are already subject to nighttime light sources so added light would not substantially penetrate into residential communities beyond existing conditions. As with existing development, light and glare impacts from the Project and future development in the area would be reduced through the adherence to applicable lighting and design standards established by the City, including for athletic facility lighting. However, no cumulative development projects were identified in the vicinity of the campus. Implementation of MM AES-1 identified in this section related to light and glare would result in less than significant construction-related and operational light and glare impacts from the Project. Therefore, the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative aesthetic impact related to light and glare. (DEIR, pp. 4.1-24, -25.)

B. Agriculture and Forestry Resources

No portion of the project site is located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to the California Department of Conservation. No portion of the project site or adjacent areas is zoned for agricultural use or currently under Williamson Act contract. The site is not designated or zoned for forestland, timberland, or timberland zoned Timberland Production. There are no forestlands on the project site or in the surrounding area. The Project would not result in the conversion of farmland to nonagricultural use or conversion of forestland to non-forest use. Because these resources are not present, no direct impact would occur. For the same reason, no cumulatively impact would occur as well.

C. Air Quality

As described in Threshold 2.2 of Section 4.2, of the Final EIR, the regional construction-related impacts would be significant and unavoidable and long-term operational impacts to regional criteria pollutant concentrations would be less than significant. Construction activities associated with the 2018 EFMP would result in less than significant construction-related localized air quality impacts, as quantified above in Table 4.2 7. Short-term cumulative impacts related to air quality could occur if construction of the Project and other projects in the surrounding area were to occur simultaneously. In particular, with respect to local impacts, the consideration of cumulative construction particulate (PM10 and PM2.5) impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of (1) the combination of the short range (distance) of particulate dispersion (especially when compared to gaseous pollutants) and (2) the SCAQMD's required dust-control measures, which further limit particulate dispersion from a project site.

The 2018 EFMP project area is largely developed, and no other development projects in the vicinity of the project site could potentially be under construction concurrently with the Project. Thus, local construction emissions would not be cumulatively considerable, the impact would be less than significant, and no additional mitigation would be required. The SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the SoCAB is in nonattainment. Therefore, the 2018 EFMP would not generate a cumulatively considerable net increase of criteria pollutants for regional construction and operational emissions.

With respect to local concentrations of CO, the analysis under Threshold 2.1, in Section 4.2 of the Final EIR, is also a cumulative analysis because it considers traffic from existing and all future sources as well as traffic from the 2018 EFMP. The impact would be less than significant. The 2018 EFMP's contribution to both regional and local TAC concentrations would be negligible. The Project would not result in a cumulatively considerable contribution to a significant cumulative impact for air quality. (DEIR, pp. 4.2-26.)

D. Biological Resources

The majority of the Project would occur within developed portions of the Mt. SAC campus that contain no suitable habitat for native plant or wildlife species. The portions of the campus with low to moderately suitable habitat that would be affected by the Project are very limited in size compared to the unaffected portions of the Mt. SAC campus with equivalent or better habitat. The remaining habitat on campus unaffected by the Project would sufficiently offset any cumulative impact resulting from off-campus projects in the greater vicinity (DEIR, pp. 4.3-32.)

E. Cultural Resources and Tribal Cultural Resources

Historical and archaeological resources impacts are site-specific with regard to any given resource. For this analysis, impacts that may be considered cumulative relate to impacts that would occur with implementation of all components of the 2018 EFMP, including previously approved projects and Phase 3 projects as defined in Section 4.0.2 of the Final EIR. Therefore, the cumulative study area for archaeological and historic resources is defined as areas within Mt. SAC boundaries.

Potential adverse impacts to historic resources resulting from implementation of the previously approved projects on campus (including the PEP) and projects included in Phase 3 of the 2018 EFMP, combined with the identified adverse impacts for Phases 1A, 1B, and 2, would result in adverse cumulative impacts to a CEQA historical resource, specifically, the Mt. SAC Historic District. With the number of contributing resources lost because of implementation of the Project, the Mt. SAC Historic District would no longer be eligible for the CRHR. As such, the Project, which constitutes a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 21084.1 and a significant indirect impact pursuant to CEQA Section 15064.5, would result in a cumulatively considerable contribution to a significant impact to a historic resource.

Implementation of Phase 3 of the 2018 EFMP and previously approved projects on campus would also require grading and excavation that could potentially affect archaeological resources, or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface cultural resources if these resources are not protected upon discovery. CEQA requirements for protecting archaeological resources and human remains are applicable to development at Mt. SAC. If subsurface cultural resources are protected upon discovery as required by law, impacts to those resources would be less than significant. As indicated above, given the low likelihood of encountering archaeological or human remains on the campus, and the mitigation measures that will be imposed and enforced throughout construction, the contribution of potential impacts from proposed development, including the Phases 1A, 1B, and 2 projects, to the cumulative destruction of subsurface cultural resources throughout the campus would be less than significant. As such, implementation of the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact to archaeological resources or human remains. (DEIR, pp. 4.4-24, -25.)

F. Energy

Electrical power and natural gas service would be provided by SCE and SCG on demand, consistent with CPUC requirements. The federal and State governments have enacted legislation to improve energy efficiency in vehicles, equipment, and appliances; to reduce vehicle miles traveled; and to develop alternative fuels or energy sources. Utility companies are also increasing their renewable energy sources to meet the RPS mandate of 33 percent renewable supplies by 2020.

On-site energy use would be reduced through compliance with Title 24, the CALGreen Code (as adopted by the County into Title 31 of the County Code) and other energy conservation programs and policies. Cumulative projects in the County would also comply with the same regulations. Further, the 2018 EFMP would implement strategies from Mt. SAC's 2018 CAP including Sustainable Building Strategies, Mobile Source Emissions Reduction Strategies, Solid Waste Reduction Strategies, and Water Conservation Strategies to implement the 2018 CAP to the fullest extent possible, consistent with budgetary constraints and regulatory and programmatic requirements.

Transportation energy use would increase with implementation of the 2018 EFMP and cumulative projects in the area. It is estimated that the 2018 EFMP-generated traffic would use 76,111 gallons of diesel fuel and 386,099 gallons of gasoline per year (refer to Appendix E). However, this transportation energy use would not represent a major amount of energy use in the County of Los Angeles or the region when compared to the amount of existing development and to the total number of vehicle trips and vehicle miles traveled throughout the County and the region. Improved

fuel economy in newer vehicles and alternative fuel vehicles are also expected to reduce transportation energy use.

As older appliances, equipment, and vehicles are replaced with newer ones, total energy use is expected to decrease over time. All future 2018 EFMP-related projects would be subject to separate impact analyses and would be subject to mitigation to reduce potential impacts, as appropriate. Thus, energy use from the 2018 EFMP and cumulative projects would not represent a substantial demand for energy and would not be considered inefficient, wasteful, or unnecessary. Cumulative impacts would be less than significant, and no mitigation is required. (DEIR, pp. 4.5-17, -18.)

G. Geology and Soils

Geology and soil impacts are generally site-specific, and there is, typically, little if any cumulative relationship between the development of a project and development within a larger cumulative area such as campus-wide or city-wide development. For example, development on the campus would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion) in areas adjacent to or outside campus; therefore, the 2018 EFMP and individual projects would not affect the level of intensity at which a seismic event on an adjacent site is experienced. However, individual project development and future development in the area may expose more persons to seismic hazards.

Projects implementing the 2018 EFMP, including Phase 1A, 1B, 2, and 3; previously approved campus projects and any foreseeable future projects would be required to comply with the applicable State and local requirements such as the CBC and the City of Walnut grading requirements (MM GEO-3). Future development under the 2018 EFMP would also be required to have site-specific geotechnical investigations prepared to identify the geologic and seismic characteristics of a site and to provide recommendations for engineering design and construction to ensure the structural integrity of proposed development (MM GEO-1); these recommendations would be incorporated into project design (MM GEO-2). Compliance of individual projects with the recommendations of the applicable geotechnical investigation and compliance with the CBC and City of Walnut grading requirements would prevent hazards associated with unstable soils, landslide potential, lateral spreading, liquefaction, soil collapse, expansive soil, soil erosion, and other geologic issues.

Paleontological resources impacts are site-specific with regard to any given resource. For this analysis, impacts that may be considered cumulative relate to impacts that would occur with implementation of all components of the 2018 EFMP, including previously approved projects and Phase 3 projects as defined in Section 4.0.2 of the Final EIR. Therefore, the cumulative study area for paleontological resources is defined as areas within Mt. SAC boundaries.

Implementation of the Phase 3 of the 2018 EFMP and previously approved projects on campus would also require grading and excavation that could potentially affect paleontological resources. The cumulative effect of these projects would contribute to the continued loss of subsurface paleontological resources if these resources are not protected upon discovery. CEQA requirements for protecting paleontological resources are applicable to development at Mt. SAC. If subsurface paleontological resources are protected upon discovery as required by law, impacts to those resources would be less than significant. As indicated above, given the moderate potential for encountering paleontological resources in certain areas, and the mitigation measures that will be imposed and enforced throughout construction, the contribution of potential impacts

from proposed development, including the Phases 1A, 1B, and 2 projects, to the cumulative destruction of subsurface paleontological resources throughout the campus would be less than significant. As such, implementation of the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact to paleontological resources. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to geology and soils, and no additional mitigation is required. (DEIR, pp. 4.6-26, -27.)

H. Greenhouse Gas Emissions

As noted above, it is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change; therefore, any impact would be considered on a cumulative basis. As described above, the net increase from the Project would be less than Mt. SAC's GHG threshold of significance for each project. The 2018 EFMP provides a long-range development plan with a series of individual projects. As discussed previously, the Project would be developed in accordance with the goals established under the campus Climate Action Plan and consequently would not conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs. Because the development of the projects envisioned under the 2018 EFMP would be consistent with the GHG reduction goals under the 2018 CAP and the projects would be less than the site-specific thresholds, the proposed projects would not result in a cumulatively considerable contribution to a significant cumulative impact related to GHGs. (DEIR, pp. 4.7-26.)

I. Hazards and Hazardous Materials

The cumulative study area associated with hazardous materials is typically site-specific except where past, present, and/or recommended land uses would impact off-site land uses and persons or where past, present, or foreseeable future development in the surrounding area would cumulatively expose a greater number of persons to hazards (e.g., hazardous materials and/or waste contamination). The cumulative study area is the Mt. SAC campus because all phases of development, including Phase 3 of the 2018 EFMP would occur on the campus. As described in Section 4.0, Phase 3 includes new buildings for Fine Arts and Adult Education and major renovations to the existing Technology Center (Building 28AB), College Services (Building 6 and 23), and Student Services (Building 9B) facilities. These uses are currently on going in different locations on campus; therefore, there would be no new or additional uses of hazardous materials associated with these buildings beyond what is already occurring on campus.

As discussed under Thresholds 8.1 and 8.2, past, existing, and recommended land uses would not result in an environmental hazard related to the transport, use, or disposal of hazardous materials or the potential for accidental release of hazardous materials. The Project (Phases 1A, 1B, and 2) and cumulative development (Phase 3) would be required to comply with applicable local, State, and federal requirements concerning hazardous materials. Therefore, the 2018 EFMP would not contribute to any potential significant cumulative hazardous materials impacts.

While the campus would continue to use varying amounts and types of hazardous materials in day-to-day activities and operations associated with existing and recommended future uses, the campus would continue to comply with all applicable laws and regulations concerning the use, storage, transportation, and/or exposure of hazardous materials, as well as with existing campus procedures to reduce potential impacts. The Mt. SAC campus would continue to comply with applicable federal, State, and local hazardous materials regulations and would be subject to

existing and future enforcement by the appropriate regulatory agencies. For these reasons, the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact related to hazardous materials. (DEIR, pp. 4.8-18.)

J. Hydrology and Water Quality

The geographic scope for hydrology and water quality includes watersheds draining to San Jose Creek/San Gabriel River Watershed. Past projects in the City of Walnut have converted undeveloped and agricultural land to urban uses resulting in residential and employment population increases and associated hydrologic and water quality impacts. The contribution of these past projects to area growth is also reflected in the recently adopted 2018 City of Walnut General Plan ("WGP"). The 2018 EFMP and other new development anticipated in the WGP would result in changes to on-site land uses, primarily the conversion of undeveloped vacant land to urban uses. Such land conversion would result in increased impervious surfaces and would increase the amount and velocity of surface runoff. The provision of drainage system improvements sized to accommodate anticipated increase in stormwater flow, as a component of each individual project including the 2018 EFMP, would ensure that project-specific impacts would be less than significant. With on-site stormwater detention systems, as described further above, the drainage from the 2018 EFMP would not exceed existing conditions.

The surface runoff water quality from the campus with implementation of the 2018 EFMP and associated LID/treatment and hydromodification BMPs, both during construction and post development, would comply with adopted regulatory requirements that are designed by the Los Angeles RWQCB to ensure that regional development does not adversely affect water quality and flow durations of receiving streams. These regulatory requirements include the MS4 Permit requirements, Construction General Permit requirements, and TMDLs. Any future urban development occurring in the San Jose Creek/San Gabriel River Watershed must also comply with these requirements. Therefore, cumulative impacts on surface water quality of receiving waters from the 2018 EFMP and future urban development in the San Jose Creek/San Gabriel River Watershed are addressed through compliance with the MS4 Permit requirements, Construction General Permit requirements, and TMDLs, which are intended to protect the beneficial uses of the receiving waters. Based on compliance with these requirements designed to protect beneficial uses, cumulative water quality and hydromodification impacts would be less than significant.

Therefore, the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact related to hydrology or water quality within the San Jose Creek San Gabriel River Watershed. (DEIR, pp. 4.9-24.)

K. Land Use and Planning

The geographic context for the analysis of cumulative land use impacts is the City of Walnut. The analysis accounts for anticipated cumulative growth within the City, as represented by implementation of development allowed by the recently adopted 2018 WGP outlined in Table LCD-3: Land use Plan Buildout, included in the Land Use and Community Design Chapter, and development of the recently approved and pending projects identified in Table 4-1, Cumulative Project List, in Section 4.0 of the Final EIR. The recently adopted 2018 WGP anticipates the development of 1,776 new dwelling units in the City, along with an increase in the resident population by 5,813 persons, and the development of 243,570 square feet of new commercial and industrial uses (Walnut 2018a). Various residential and non-residential uses and public

facilities are proposed within the City and the Mt. SAC service area that would lead to new development, redevelopment, and increasing urbanization on campus and in the surrounding areas. New development on vacant areas and underutilized lots would lead to an intensification of housing development, commercial and industrial land uses, and public and institutional uses in the City. The redevelopment of existing land uses is also anticipated in the recently adopted 2018 WGP. Consistent with 2018 WGP goals and policies relative to both development and preservation of open space resources, growth would occur in areas of the City determined to be more suitable for development.

The conversion of existing land uses on campus resulting from implementation of the 2018 EFMP, individual projects under the 2018 EFMP, and cumulative development would occur within the provisions of the 2018 WGP and Planning and Zoning Ordinance, as applicable. All future development in the City would be reviewed for consistency with adopted land use plans and policies by the City of Walnut, including 2018 WGP policies and zoning requirements, the requirements of CEQA, the state Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Future development in the City would also be governed by City policies, implementation measures, and programs to ensure orderly urban development.

Therefore, it can be assumed that through compliance with these regulations, future development would be consistent with adopted land use goals and policies and compatible with existing land uses. However, even if the cumulative impact of these individual projects would be significant, the 2018 EFMP's contribution to such cumulative land use impacts is less than significant and thus, is not cumulatively considerable because (1) development allowed by the 2018 EFMP would not change the type of development allowed on campus; (2) the Project is consistent with the 2018 WGP goals and policies as identified through the analysis presented in this section; (3) individual projects implemented under the 2018 EFMP would be subject to review and approval by the City, as applicable; and (4) with implementation of project-specific mitigation measures, the 2018 EFMP and individual projects associated with the 2018 EFMP would not result in significant cumulative land use impacts on or off campus. (DEIR, pp. 4.10-26.)

L. Mineral Resources

There are no locally important mineral resource recovery sites designated in the City. Therefore, implementation of the Project would not result in the loss of such mineral resources, individually or cumulatively.

M. Noise

Noise Generated by Traffic from the Project and Cumulative Growth

Cumulative traffic noise impacts are measured based on projected long-term future traffic noise level increases over existing conditions. This analysis considers the forecasted traffic volumes for scenarios that include approved and pending (not-approved) projects currently in process within the City of Walnut or adjacent communities that could impact traffic volumes within the study area, which is the 2027 scenario described. Long-term cumulative off-site impacts from traffic noise are measured as follows. First, a substantial cumulative noise increase would occur if future traffic noise levels increase by more than 3 dBA compared to existing conditions.

Table 4.11-18 of the Final EIR shows the cumulative noise level increases associated with the 2018 EFMP. With the exception of the northern segment of the Temple Ave. and Transit Center

Access intersection, there is no substantial cumulative noise increase of more than 3 dBA between 2027 With-Project and the existing conditions. The increase in noise is due to the development of a new transit center within the center of campus. Noise level increases associated with travel along roadways at this intersection are not considered substantial and would not expose off-campus uses to excessive noise level increases due to far distances between this road segment and the off-campus uses. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact due to traffic noise.

Vibration

Construction vibration is a local impact; as shown in Threshold 11-3 of the Draft EIR, impacts are generally less than significant when the receptor is more than 25 feet from the vibration source. There are no identified projects anticipating construction concurrently with the Project and within 50 feet of the sensitive receptors that could be affected by the Project. As such, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact due to construction vibration.

Construction Noise

There would be a potential for significant cumulative construction noise impacts if construction from a cumulative project would occur near a sensitive receptor concurrently with project-related construction near that same receptor. Implementation of MM NOI-1 would ensure that noise levels from project-related construction activities would be less than 65 dBA L_{eq} at off-campus uses by identifying which construction areas could be developed concurrently and prescribing noise-reduction measures to reduce impacts to less than significant. Therefore, with implementation of NOI-1, Project-related construction noise impacts would be less than significant. Construction projects result in localized noise impacts. The majority of project-related campus development would occur within the campus, away from off-site uses. As such, noise associated with off-site construction activities would be substantially attenuated between each construction site. Consequently, impacts associated with cumulative construction noise would be less than significant. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact due to construction noise. (DEIR, pp. 4.11-30, -31, -32.)

N. Population and Housing

The cumulative study area for population, housing, and employment would include the cities and communities within the Mt. SAC geographic boundaries and service area, including the City of Walnut, and is based on the use of the 2016–2040 RTP/SCS Growth Forecast by Jurisdiction. Development of the 2018 EFMP and other projects in the cumulative study area would lead to increases in population. However, as discussed above, assuming the conservative high growth rate for Mt. SAC, the estimated increase in on-campus population during the fall semester (students, faculty, and staff) would be approximately 4,938 individuals over the 2018 EFMP ten-year horizon period. As discussed above, this would not represent a substantial amount of the future population growth anticipated in the cities within the Mt. SAC geographic boundaries and service area.

Further, the anticipated enrollment increase for the 2018 EFMP ten-year horizon period would be accommodated by not only the proposed on-campus projects identified for Phases 1A, 1B, and 2, but also by facilities planned for Phase 3 (beyond the ten year horizon period) and previously approved projects at Mt. SAC. No additional enrollment or employee growth would be associated with cumulative projects at Mt. SAC and Phase 3 of the 2018 EFMP. No significant cumulative

adverse impacts related to substantial population, housing, or employment growth and displacement would occur with implementation of the 2018 EFMP. The 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact. (DEIR, pp. 4.12-8.)

O. Public Services and Recreation

Past projects in the City of Walnut and surrounding cities within Los Angeles County and unincorporated areas have converted undeveloped and agricultural land to urban uses resulting in area residential and employment population increases and associated impacts to public services. The contribution of these past projects to area growth is also reflected in Los Angeles County projections (i.e., 2016–2040 RTP/SCS Final Growth Forecast by Jurisdiction). Future regional growth will result in increased demand for public services and facilities. Service providers will continue to evaluate levels of service desired and potential funding sources to meet this demand. Long-range planning for the provisions of public services and facilities is typically based on growth projections that reflect 2018 WGP growth projections.

Fire Protection and Police

As additional development occurs in the City of Walnut and surrounding areas, the demand for law enforcement and fire protection services, including personnel, equipment, and/or facilities will increase. However, increases in demand are routinely assessed by the LACoFD and LASD as part of the standard monitoring and budgeting process, and law enforcement and fire protection services in the City and County are anticipated to be adequate to serve the 2018 EFMP and cumulative projects. Additionally, the Project's contribution to cumulative impacts would be less than significant since the campus would continue to be adequately served with existing personnel, equipment, and facilities. No new or expanded LACoFD or LASD facilities would be required to serve the Project, and no associated physical environmental impacts would occur. With respect to police services, the campus would also continue to be served by professional security services provided by the Department of Police and Campus Safety; this department would increase staff, equipment, and facilities as necessary to serve the increase in demand generated by the 2018 EFMP (Phases 1A, 1B, and 2).

Because implementation of the 2018 EFMP full buildout (Phases 1 through 4) can be accommodated by the existing and projected LACoFD and LASD service capabilities, and because existing requirements for fire and life safety (as identified in (RR PS-1) would be implemented as part of the Project, which continue to ensure the adequate provision of services, the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact related to fire and police protection.

School

Increased development throughout the City of Walnut and Los Angeles County would generate additional demand for public school classroom seating capacity within the surrounding school districts. The degree to which this demand would be satisfied is dependent upon future enrollment trends. However, all new private sector development will be required to pay statutory impact fees to school districts (pursuant to Senate Bill 50) to help fund construction of additional classroom capacity; and, under current law, payment of these fees is deemed to constitute full mitigation under CEQA. For these reasons and assuming that cumulative demand for school capacity would be met as planned by the school districts within and surrounding the City of Walnut and Los Angeles County, cumulative impacts would be less than significant.

However, as discussed above, the 2018 EFMP would add a relatively small number of new employment opportunities, which would likely be filled by the local labor pool. The proposed housing projects in the City and the County do not involve the development of new residential uses that would result in a direct increase/generation of students. As such, implementation of the proposed City and County housing projects is not expected to increase the number of students enrolled in the school districts within the Mt. SAC boundaries or service area substantially including the City of Walnut and surrounding cities within Los Angeles County. As a result, the 2018 EFMP would not have a cumulatively considerable contribution to cumulative impacts on schools.

Other Public Facilities (Libraries)

Increased development throughout the City of Walnut and Los Angeles County would generate additional demand for library services and facilities. However, the proposed City and County housing projects would not result in a cumulatively considerable contribution to a significant cumulative impact. The 2018 EFMP would add a relatively small number of new employment opportunities, which would likely be filled by the local labor pool but would not involve an increase in the anticipated student enrollment at the campus and do not involve the development of new residential uses that would result in a direct increase in demand for library services. As such, implementation of the proposed City and County housing projects is not expected to substantially increase the demand for library services on and off campus and would not have a cumulatively considerable contribution to cumulative impacts on libraries.

Parks and Recreation

The geographic area for cumulative analysis of recreation is defined as the City of Walnut and Los Angeles County. In order to accommodate future cumulative demand, additional park and recreational facilities would be developed and constructed throughout the City of Walnut, including on the Mt. SAC campus for students and faculty/staff. Because the size, location, and type of these future facilities in the City of Walnut is not known at this time, it is speculative to assess the magnitude of cumulative impacts associated with the construction of these facilities. However, the 2018 WGP and Subdivision Ordinance (in accordance with the Quimby Act) requires residential developers to dedicate parkland and/or improvements/amenities, and/or pay fees in-lieu of dedication, at a rate of 5 acres per thousand population. The allocation of land and improvements is apportioned at 2 acres to community parks and 3 acres to public and/or private neighborhood parks. Additionally, it is reasonable to expect that all these facilities would undergo CEQA review in accordance with California law and that project-specific impacts associated with development of each of these facilities would be mitigated to the extent feasible.

As previously discussed, the 2018 EFMP includes the provision of new and modified on-campus athletic and recreational facilities. The potential impacts from construction and operation of these facilities are fully analyzed in each appropriate section of the Final EIR. The construction and operational impacts from these facilities would be limited to uses on campus and immediately adjacent to the campus; no cumulative projects have been identified in the vicinity of the campus that would result in significant cumulative impacts. As a result, the 2018 EFMP would not result in a cumulatively considerable contribution to a significant cumulative impact related of park and recreational facilities. (DEIR, p. 4.13-18, -19.)

P. Transportation/Traffic

Cumulative traffic impacts consider the impacts of future growth and development in the City on the roadway system serving the Project area as well as non-vehicular transportation services. A detailed quantitative analysis of Project traffic impacts under General Plan and Project buildout conditions was discussed in Section 4.14.5, Environmental Impacts, Threshold 14-1. As identified in that analysis, the Project would result in a significant and unavoidable cumulative impact under 2021 Plus Project Condition and 2027 Plus Project Condition at the intersections of Mountaineer Road and Grand Avenue and Valley Boulevard and Grand Avenue. In addition, the Project would result in a significant and unavoidable cumulative impact under the 2027 Plus Project Condition at the intersections of Amar Road and Meadow Pass Road, even with implementation of Mitigation Measures TRA-1 and TRA-2. There is insufficient right-of-way to accommodate the required improvements at these intersections; therefore, the Project would contribute to this cumulatively considerable traffic impact.

The Project would have less than significant impacts related to transportation and traffic issues evaluated in Section 4.14.5 above (Thresholds 14.2 through 14.4) and therefore, would not result in any significant cumulative impacts related to these other transportation issues, and no additional mitigation is required. (DEIR, pp. 4.14-37.)

Q. Tribal Cultural Resources

Although tribal cultural resources are site-specific with regard to any given resource (e.g. resources of important cultural value to Native Americans), impacts may be considered cumulative simply because they relate to the loss of cultural resources in general over time throughout the region. There are no tribal cultural resources listed or determined eligible for listing, on the national, State, or local register of historical resources on the Mt. SAC campus. However, should buried resources be identified, ground disturbance within native sediment could lead to the accelerated degradation of previously unknown tribal cultural resources. (DEIR, pp. 4.15-8.)

R. Utilities and Service Systems

The cumulative impact area to determine cumulative impacts on utility services considers the service area of the respective providers.

Water Supply

Water service is provided by the Three Valleys Municipal Water District (TVMWD). The primary water sources are approximately 45 percent local (groundwater, surface) and 55 percent imported. The 2015 UWMP provides the TVMWD's existing and projected sources of water available to the TVMWD through the year 2040 as well as projected water uses, water conservation measures, water rate structure, and drought management programs. The 2018 EFMP water demand increase represents approximately 2 percent contribution of the estimated water demand increase of the 2015 UWMP from 2020 to 2040. The 2015 UWMP indicates that the TVMWD will have adequate water supplies to meet demands during normal, single-dry, and multiple-dry years to 2040 (TVMWD 2016). The 2018 EFMP would not contribute to a cumulatively considerable impact to water supplies.

Wastewater

Cumulative impacts on trunk sewer lines and wastewater treatment would occur within the service area of the County Sanitation Districts of Los Angeles County ("LACSD"). Future growth and development in the region would generate additional wastewater that would require conveyance and treatment at the WRPs of the LACSD, including the San Jose Creek WRP. This WRP currently has a remaining capacity of 36.2 mgd. Of this, the 2018 EFMP's estimated wastewater generation represents less than one percent of the remaining capacity at the San Jose Creek WRP. Also, all future development projects in the LACSD's service area would be subject to the LACSD's Wastewater Ordinance, which includes the Connection Fee program. The Connection Fee program requires all new users of the LACSD's sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The LACSD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments. Based on continued implementation of the LACSD Wastewater Ordinance and the nominal contribution of additional wastewater flows to the LACSD system, the 2018 EFMP would not contribute to a cumulatively considerable impact to LACSD facilities.

Storm Drain

The cumulative study area for storm drains includes the public storm drain system within the City of Walnut as well as tributary systems beyond the City's limits. The 2018 EFMP and other new development anticipated in the recently adopted 2018 City of Walnut General Plan would result in changes to on-site land uses, primarily the conversion of undeveloped vacant land to urban uses. Such land conversion would result in increased impervious surfaces and would increase the amount and velocity of surface runoff entering the storm drain system. The provision of drainage system improvements sized to accommodate anticipated increase in stormwater flow, as a component of each individual project associated with the 2018 EFMP, would ensure that project-specific impacts would be less than significant. With on-site stormwater detention systems, the drainage from the 2018 EFMP would not exceed existing conditions. Therefore, the Project would not contribute to a cumulatively considerable impact to storm drain facilities.

Electric Power

Electrical power would be provided by SCE on demand, consistent with CPUC requirements. The 2018 EFMP and other new development in the service area would result in increased demand for electricity and an increased demand on the existing distribution system. Each new project associated with the 2018 EFMP would be required to coordinate with SCE to implement necessary upgrades to existing facilities or construction of new facilities to accommodate the anticipated demand. Additionally, on-site energy use would be reduced through compliance with Title 24, the CalGreen Code (as adopted by the County into Title 31 of the County Code), and other energy conservation programs and policies. Cumulative projects in the County would also comply with the same regulations.

Natural Gas

Natural gas service would be provided by SCG on demand, consistent with CPUC requirements. The 2018 EFMP and other new development in the service area would result in increased demand for natural gas and an increased demand on the existing distribution system. Each new project associated with the 2018 EFMP would be required to coordinate with SCG to implement

necessary upgrades to existing facilities or construction of new facilities to accommodate the anticipated demand. Additionally, on-site energy use would be reduced through compliance with Title 24, the CalGreen Code (as adopted by the County into Title 31 of the County Code), and other energy conservation programs and policies. Cumulative projects in the County would also comply with the same regulations.

Telecommunications

The cumulative study area for telecommunications is inclusive of Verizon's service area. Future growth and development in the region would generate additional demand for telecommunication services. As with the Project, all future projects associated with the 2018 EFMP would be responsible for connection to Verizon's facilities and would be required to comply with all applicable regulations related to telecommunications.

Solid Waste

Solid waste collection services are provided on demand by private haulers, and cumulative impacts on their services would occur from future development in their service area. Available landfill capacity is expected to decrease over time with future growth and development in the San Gabriel Valley. Waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. Also, CalRecycle is responsible for administering and monitoring State solid waste reduction initiatives, and individual jurisdiction's ability to meet these requirements. It is assumed that the role of CalRecycle would continue in the future. Based on the available capacity of landfills in the region and the nominal contribution of additional solid waste requiring disposal, approximately 0.10 percent of the County landfill's daily capacity, the 2018 EFMP would not contribute to a cumulatively considerable impact to landfill capacity or solid waste regulations. (DEIR, pp. 4.16-16, -17, -18.)

X. FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(c) of the CEQA Guidelines requires that a Final EIR describe any significant irreversible environmental changes, which would occur as a result of the proposed action should it be implemented. The Mt. SAC campus in the City of Walnut is currently developed with various uses including 144 Buildings (1,707,128 gross square feet [gsf]), various athletic and recreation facilities, and surface parking lots. The long-term commitment of land resources to a college campus has already occurred with previous development on campus, with the opening of the college in fall of 1946. Additionally, as described in Section 3.0, Project Description, of the Final EIR, the currently approved 2015 Facilities Master Plan Update, Physical Education Project (Phase 1 and 2), West Parcel Site Improvements, and the Transit Center allows for the development of up to approximately 222,730 gsf of institutional uses. Implementation of the 2018 EFMP would include removal/demolition of 33 aged and/or temporary facilities (approximately 207,805 gsf of building space); 13 new buildings (approximately 752,000 gsf), including construction of 10 major buildings; up to four parking structures would be constructed; and 9 buildings (405,023 gsf) would be renovated. Therefore, should the 2018 EFMP be fully implemented, there would be approximately 2,474,053 gsf of building space on campus (including the previously approved Physical Education Project [“PEP”]). This represents a net increase of approximately 766,925 gsf compared to existing conditions when taking into consideration the PEP, and a net increase of approximately 544,195 gsf when considering the recommended development under Phases 1A, 1B, and 2 of the 2018 EFMP.

The Project would convert existing developed and undeveloped areas on the campus to uses that would further serve the college, resulting in a continuation of the long-term commitment of land resources to these uses. Construction and long-term operation of the 2018 EFMP would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including petroleum fuels, and natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures); and lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, piping, and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stresses would also be impacted by Project implementation, such as air quality through the combustion of fossil fuels and production of greenhouse gases; and water supply through the increased potable water demands for drinking, cooking, cleaning, landscaping, and general maintenance needs. An increased commitment of public services (e.g., police, fire, and sewer and water services) would also be required. Therefore, implementation of the 2018 EFMP results in an irreversible commitment of land, energy resources, and public services. Restoration of the campus to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

XI. FINDINGS REGARDING GROWTH-INDUCING IMPACTS

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the 2018 EFMP could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. To address this issue, potential growth-inducing effects are examined through analysis of the following questions:

1. Would this Project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?
2. Would this Project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not necessarily beneficial, detrimental, or of little significance to the environment (CEQA Guidelines, Section 15126.2(d)). This issue is presented to provide additional information on ways in which the 2018 EFMP could contribute to significant changes in the environment, beyond the direct consequences of implementing the Project examined in the preceding sections of the Final EIR. It should also be noted that while implementation of the 2018 EFMP would result in new development on campus, the associated increases in population are not considered to be the result of growth inducement, but rather reflects the accommodation of growth already anticipated by the recently adopted 2018 City of Walnut General Plan ("2018 WGP") and SCAG 's Regional Growth Forecast. Section 4.12, *Population and Housing* provides additional discussion regarding such growth.

1. Would this Project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?
As discussed in Section 3.0, Project Description, no major new infrastructure facilities are required to accommodate the 2018 EFMP. On-campus vehicular circulation improvements are proposed at the intersections of Temple Avenue/Bonita Way and Parking Structure S (Phase 1A), Temple Avenue/Mt. SAC Way (Phase 1B), and Grand Avenue/San Jose Hills Road (Phase 2). Roadway improvements are proposed on campus at La Puente Drive, Grand Avenue/Mountaineer Way and Farm Precinct. In addition, a new emergency access route connecting Bonita Drive to the southern campus boundary is proposed. These improvements are recommended as part of the 2018 EFMP to address existing conditions and respond to input from students and community members about the need to improve wayfinding, safety, and to improve the flow of vehicles within the campus and on the adjacent public roadways. They would also address the increased traffic volumes that would be generated by the Project. However, the proposed intersection and roadway improvements would not provide additional capacity that would induce unplanned growth.

Existing backbone wet and dry utility infrastructure is currently installed within or in the vicinity of the campus. The backbone infrastructure would be protected in place during

construction and operation. However, implementation of the 2018 EFMP would involve removal of existing utility infrastructure on campus, and construction of new utility infrastructure, as necessary to serve the proposed facilities and site improvements. The utility infrastructure installed as part of the Project would be sized and located expressly to serve the campus (existing and proposed uses), and would not, therefore, induce growth in the 2018 EFMP vicinity.

The 2018 EFMP identifies the framework for the uses and development of land on campus necessary to accommodate an identified level of enrollment and physical development. Relevant to Mt. SAC, on September 5, 2018, the City of Walnut Planning Commission adopted PC Resolution No. 18-12 recommending that the City Council adopt Zoning Code Amendment (ZCA) No. 2018.01, Zone Change (ZC) No. 2018-02, and Negative Declaration (ND) No. 2018-01 to establish the School and Public Institution Ordinance and Zone(s) for consistency with the recently adopted 2018 *City of Walnut General Plan* (2018 WGP). On January 9, 2019, The ZCA and ZC were presented to the Walnut City Council for review and the Council moved to continue the item until the settlement agreement between Mt. SAC and the City of Walnut is approved and enforceable. As noted above, at this time the settlement agreement has not been finalized or approved by the governing bodies Mt. SAC and the City. Relevant components of the ZCA and ZC are discussed below under the City of Walnut. With adoption of the ZCA and ZC, which involves zoning the portion of the Mt. SAC campus east of Grand Avenue as Schools and Public Institutional zone, Mt. SAC would be required to comply with established zoning regulations. For educational facilities, the Mt. SAC Board of Trustees may exempt Mt. SAC from the City's zoning requirements, pursuant to the provisions of CGC Section 53094(b).

Table 4.10-3 in Section 4.10 of the Final EIR, identifies the permitted, conditionally permitted, and prohibited uses and activities for the proposed SPI zone. As shown, colleges would be permitted uses in the SPI zone and, thus the Project, which will maintain the use of Mt. SAC as a community college, would be a permitted use. In addition, specific improvements under the 2018 EFMP (such as the proposed Student Center facility, sand volleyball courts and tennis courts, Science facility, Bookstore facility, Makerspace facility, Library/Learning Resource facility, Student Services North facility, Technical Education facility, Campus Safety facility, School of Continuing Education facility, parking structures and parking lot reconfiguration, building renovations and demolitions, pedestrian bridges, landscaping, public art and signs, and utility infrastructure and roadway improvements) would be allowed on campus since libraries, related classroom facilities, parking facilities, pedestrian bridges, and related amenities are permitted uses in the proposed SPI Zone. Also, the proposed Auditorium, Fire Training facility, Reuse Depot, and maintenance and transportation building and theater renovations are permitted subject to conditional use permits. As noted above, to the extent such projects are educational facilities, Mt. SAC may exempt itself form conditional use permit requirements.

Approval of the 2018 EFMP and associated discretionary actions would not remove an existing regulatory obstacle to growth, but rather, would redefine the nature of such growth. The continued development of the campus pursuant to existing entitlements would not encourage growth through the provision of new and essential public services or access opportunities, nor would it result in urbanization of land in a remote location. The Project is not, therefore, considered to be growth inducing with respect to removal of obstacles to growth. Additionally, as discussed in Section 4.10, Land Use and Planning, the 2018

EFMP would be consistent with the goals/policies of the 2018 WGP and other relevant planning documents that address development within the City of Walnut.

2. ***Would this project result in the need to expand one or more public services to maintain desired levels of service?*** As discussed in Section 4.13, Public Services and Recreation, of the Final EIR the Project would potentially increase the demand for public services (police and fire) but would not necessitate the expansion of existing public service facilities in order to maintain desired levels of service. In the event that these facilities or associated resources do need to be expanded, funding mechanisms are in place through existing regulations and standard practices to accommodate such growth. The 2018 EFMP would not, therefore, have significant growth-inducing consequences with respect to public services.

3. ***Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?*** During project-specific construction associated with the 2018 EFMP, a number of design, engineering, and construction-related jobs would be created, which would last until project-specific construction is completed. This would provide economic stimulus in the area; however, these jobs are typically filled by existing residents of the region and would not be substantial enough to foster other activities that would have significant effects on the environment.

   In addition, the 2018 EFMP would result in the addition of between 926 and 1,557 students and between 313 and 519 employees. However, as discussed in Section 4.12, Population and Housing, of the Final EIR this proposed increase in individuals on campus is within the SCAG 2016-2040 RTP/SCS Growth Forecast. Additionally, the faculty/staff positions are typical of higher education institutions in the region and may not offer a unique enough opportunity to induce job seekers to relocate to the area for the sole purpose of filling these positions. While some faculty/staff may transfer into the area to fill these positions, it is expected that qualified area residents would fill the vast majority of additional faculty and staff positions. Similarly, it is anticipated that construction employees would commute from elsewhere in the region, rather than relocate to the Walnut area for a temporary construction job. Nonetheless, implementation of the 2018 EFMP may result in the creation of indirect and induced jobs. Indirect jobs are those that would be created when the campus purchases goods and services from businesses in the region, and induced jobs are those that are created when wage incomes of those employed in direct and indirect jobs are spent on the purchase of goods and services in the region.

4. ***Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?*** As discussed previously, the Project involves facilities and site and infrastructure improvements anticipated to occur with implementation of the 2018 EFMP during the 10-year horizon period (Phases 1A, 1B, and 2). The Project does not involve any changes in the type or amount of allowed development on campus or the City. Additionally, these actions, which include new and different restrictions to campus operations, are project-specific and would not encourage and facilitate other activities. The campus would continue to function as a college and would be consistent with existing land use and planning policies.

No changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement the 2018 EFMP. Regulatory requirements, and project-specific mitigation measures have been identified in Sections 4.1 through 4.16 of the Final EIR to ensure that implementation of the Project complies with all applicable City plans, policies, and ordinances, as applicable, to ensure that there are no conflicts with adopted land development regulations and that environmental impacts are minimized. The 2018 EFMP does not propose any precedent-setting actions that, if approved, would specifically allow or encourage other projects and resultant growth to occur.

XII. FINDINGS REGARDING ALTERNATIVES

In compliance with Section 15126.6(a) of the California Environmental Quality Act ("CEQA") Guidelines, an Environmental Impact Report ("EIR") must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives". The Mt. San Antonio Community College District ("Mt. SAC" or "college"), as the CEQA Lead Agency, is responsible for selecting a range of Project alternatives. This section identifies potential alternatives to the 2018 EFMP and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the Final EIR.

- The discussion of alternatives shall focus on alternatives to the Project or its location which are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objective, or would be more costly (Section 15126.6[b]).
- The specific alternative of "no project" shall also be evaluated along with its impact (Section 15126.6[e][1]).
- The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the Draft EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6[e][2]).
- The range of alternatives required in a Draft EIR is governed by the "rule of reason" that requires the Draft EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the Draft EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the Project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (Section 15126.6[f]).
- [For alternative locations,] only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the Draft EIR (Section 15126.6[f][2][A]).

- If the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the Draft EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given locations (Section 15126.6[f][2][B]).
- A Draft EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the 2018 EFMP is considered and evaluated in the Final EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides the following:

- A description of alternatives considered.
- A comparative analysis of the alternatives under consideration and the 2018 EFMP. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the Project to a less than significant level.
- An analysis of whether the alternatives meet most of the objectives of the Project (as presented in Section 3.3 of the Final EIR and restated below).

A. Alternatives Considered But Not Carried Forward for Detailed Analysis

Section 15126.6(c) of the State CEQA Guidelines specifies that a Draft EIR should (1) identify alternatives that were considered by the Lead Agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the reasons underlying the Lead Agency's determination. This section of the State CEQA Guidelines states "Among the factors that may be used to eliminate alternatives from detailed consideration in an [Draft] EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts".

The following alternatives were considered during the scoping and planning process but were not selected for detailed analysis in the Final EIR. In addition to an alternative site, alternatives that were considered but not carried forward for analysis in the Final EIR include previous iterations of the 2018 EFMP that were considered by Mt. SAC but were ultimately eliminated from further consideration due to potential impacts, which would be greater than the Project, and due to concerns raised by the adjacent residential communities, as described below.

i) Alternative Site

CEQA requires that the discussion of alternatives focus on alternatives to the Project or its location, which are capable of avoiding or substantially lessening any significant effects of the Project. The key question and first step in the analysis is determining whether any of the significant effects of the 2018 EFMP would be avoided or substantially lessened by developing the Project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the Final EIR (State CEQA Guidelines, Section 15126.6[f][2][B]). There is approximately 1.71 million square feet (msf) of existing building development on campus (144 buildings). There are also athletic facilities, a Wildlife Sanctuary, the Farm Precinct, and surface parking lots. Many of these existing buildings and improvements would remain in place.

The currently approved Facilities Master Plan (2015 Facilities Master Plan Update [2015 FMPU]), which replaced the 2012 Facilities Master Plan, anticipated that the campus would have a total of 1,552,072 assignable square feet ("asf") and approximately 2.0 million gross square feet ("gsf") by the projected buildout year of 2025 to accommodate a student enrollment of 39,731 students. The 2018 EFMP generally has a planning horizon of approximately 10 years (through 2027). The total floor area at buildout of Phases 1A, 1B, and 2 of the 2018 EFMP would be 2.47 million gsf to serve the projected increase in the unduplicated student headcount from 37,864 students in Fall 2017 to between 40,802 and 42,745 students by Fall 2027.

The 2018 EFMP does not involve an expansion of the campus boundaries. As further discussed in Section 3.4, Project Background, of the Final EIR, the 2018 EFMP involves an update to the 2015 FMPU to address changes in the demand for higher education and the need to replace aging infrastructure on campus. Thus, the Alternative Site assumes development of only the proposed net increase in square footage (544,195 gsf) at an alternate site, not relocation of the Mt SAC campus in its entirety.

As identified in Section 5.3 of the Final EIR, the 2018 EFMP objectives focus on accommodating the demand for community college students, faculty, and staff and implementing the facilities, site improvement and infrastructure needed to support the growth projected for Instructional Programs and Support Services at Mt. SAC. Construction of the proposed institutional uses at any other location in the City would not meet these key Project objectives and would not maximize functional space, improve the utilization of space, or improve the efficiency of space on campus. It would also decrease pedestrian and vehicular connectivity and accessibility, due to the differing locations of on-campus and off-campus facilities. Thus, implementing the proposed structures associated with the 2018 EFMP, including the Student Center, Bookstore, Parking Structures R and S, tennis courts and volleyball courts and replacement communication tower, at another site would not accomplish the objectives of the Project. This alternative would not maintain or enhance the synergy that comes from providing necessary resources in the same location on campus.

Because the campus already has existing, scattered student center and bookstore facilities, it would not be efficient to demolish these structures and build the Student Center and Bookstore at an alternative site, which would be located away from the instructional and program buildings that the majority of the student body utilize. Locating the proposed Parking Structures R and S, tennis courts and volleyball courts at the alternate site would also be inefficient, as it would require longer walks to reach the instructional and program buildings on campus. This alternative would also require the construction of site and infrastructure improvements necessary to support the proposed buildings uses at an off-campus location. Additionally, implementing the proposed institutional uses and support facilities at an alternate site would not allow for the removal of aging buildings and infrastructure and replacement of these buildings with more efficient, functional, and sustainable facilities, which are also objectives of the 2018 EFMP.

With respect to environmental impacts, as identified through the analysis presented in Sections 4.1 through 4.16 of the Final EIR, the 2018 EFMP (Phases 1A, 1B, and 2) would result in significant and unavoidable impacts from construction and/or operation of proposed facilities and associated site and infrastructure improvements. Specifically, the Project would result in significant unavoidable impacts related to Cultural Resources (demolition of buildings) and Transportation/Traffic.

Without a site-specific analysis, the physical impacts from construction and operation, including impacts to biological resources, cultural resources, geology/soils, hazards and hazardous

materials, hydrology/water quality, mineral resources, and utilities/service systems at an alternative site cannot be meaningfully evaluated. However, development of the Project at an alternative site would likely result in similar or less construction-related impacts compared to the 2018 EFMP, including construction-related air quality, greenhouse gas ("GHG") emissions, and noise impacts if the same facilities are constructed. Also, impacts related to historical resources would be avoided since campus buildings considered contributors Mt. SAC Historic District would not be demolished or renovated. At the same time, development within the existing boundaries of the campus provides an infill type of development, which would typically result in less impacts than new construction at an undeveloped site (as it relates to biological resources, archaeological, paleontological and tribal cultural resources, and hydrology/water quality).

Operation of the 2018 EFMP at an alternative site would also have greater operational impacts than the Project, as it relates to increased traffic, air quality emissions, GHG emissions, and noise if there is a need to use vehicles to travel between campus facilities and the alternative site. In addition, the less than significant impacts of the 2018 EFMP would be similar at an alternative site because development of the Project at an alternative site would only move Project impacts to a different location, thus resulting in impacts to the same land area, types of land use, and project size and would be subject to the same regulatory requirements and MMs. However, impacts related to land use, population and housing (displacement), public services, and utilities could be greater than the impacts of the 2018 EFMP. Therefore, construction and operation of the Project at an alternative site would reduce the 2018 EFMP's significant impacts on historical resources but, at the same time, it would increase other impacts.

Mt. SAC does not own other land in the district boundaries that would accommodate the 2018 EFMP and meet the Project objectives. CEQA does not require the consideration of sites not owned by the landowner or which could not be reasonably acquired by the landowner as alternatives to the Project (State CEQA Guidelines, § 15126.6[f][1]).

Finding: The Mt SAC Board of Trustees rejects the Alternative Site Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) there are no alternative sites in the district boundaries that would meet the 2018 EFMP objectives related to maximized functional space, improved utilization and efficiency of space, sustainable facilities design, construction and operations, and improved pedestrian and vehicular access and circulation, (1) while locating the 2018 EFMP at an alternative site would reduce the significant unavoidable impacts of the Project on historical resources, and (3) development at any alternatives site to serve campus programs and facilities would result in greater impacts due to the distance between the existing facilities on campus and the alternative site. Therefore, the Alternative Site Alternative is eliminated from further consideration.

ii) Mt. SAC Historic District Retention

As discussed in Sections 4.4 and 5.4 of the Final EIR to accommodate the proposed Student Center and Central Campus Infrastructure and Bookstore, the 2018 EFMP would require demolition of buildings that are contributing resources to the Mt. SAC Historic District. Demolition of these buildings would result in a potentially significant and unavoidable impact. Even with implementation of MM CULT 1 requiring implementation of Historic American Buildings Survey ("HABS") documentation and MM CULT-2 requiring establishment of interpretive sign(s) in one or adjacent to one of the major buildings in the historical heart of the campus, the loss of the historic district would be a significant and unavoidable impact resulting from the 2018 EFMP. In order to avoid this impact, an alternative would need to either (1) relocate the proposed Student

Center and Central Campus Infrastructure and Bookstore or (2) not construct the proposed Student Center and Central Campus Infrastructure and Bookstore. While relocation of the Student Center and Bookstore buildings to another area on the campus would be feasible, relocation of the Central Campus Infrastructure would not be a feasible option.

As discussed in Section 3.0, Project Description, of the Final EIR, the Central Campus Infrastructure project includes the replacement of storm drain, domestic/fire water, chilled water (including the proposed location of a new central plant), high voltage electric loops, electrical distribution, sanitary sewer, natural gas, telecommunications conduits and copper.

Finding: Mt. SAC rejects the Mt. SAC Historic District Retention Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the current infrastructure system is aging and must be replaced in the immediate future to continue serving the campus without major infrastructure system failures; thus, the Central Campus Infrastructure project is a critical element to the continued operation of the Mt. SAC campus; (2) the selected location for the Central Campus Infrastructure project is predetermined based on the existing utility infrastructure system layouts on campus; (3) if an alternate location were to be identified, the impacts related to rerouting the infrastructure systems would require an expanded disturbance area, resulting in substantially greater impacts than the 2018 EFMP. Therefore, the Alternative Mt. SAC Historic District Retention Alternative is eliminated from further consideration.

iii) 2015 Facilities Master Plan Update

The 2018 EFMP, as described in Section 3.0, Project Description, of the Final EIR, is an update of the 2015 Facilities Master Plan Update ("FMPU"). Thus, Mt. SAC has the option to not adopt an update to the FMPU and, instead, continue to use of the 2015 FMPU. Since no new Facilities Master Plan would be adopted by Mt. SAC, no CEQA compliance or environmental analysis is necessary. The impacts associated with the 2015 FMPU have been analyzed in the 2015 Facilities Master Plan Update and Physical Education Project Final Subsequent/Program/Project EIR ("2015 FMPU/PEP SEIR"), which evaluated the 2015 FMPU at a program-level, and Phases 1 and 2 of the Physical Education Projects ("PEP") at a project-level. Therefore, further analysis of the impacts of the 2015 FMPU is not provided in the Final EIR and need not be re-analyzed if the 2015 FMPU is not updated.

Finding: Mt. SAC rejects the Mt. SAC Historic District Retention Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) this alternative does not allow Mt. SAC to better plan for the facilities, services, programs, and improvements on campus that would be needed to serve the changing student population and demand for higher education; and (2) it will make Mt. SAC implement facility and infrastructure improvements that would only meet near-term needs and not provide the facilities and infrastructure needed in the more distant future. Therefore, since this alternative would not provide an up-to-date plan for Mt. SAC and would not meet any of the 2018 EFMP objectives, Alterative 2015 Facilities Master Plan Update Alternative is eliminated from further consideration. Alternatives Selected for Further Analysis.

B. Alternatives Selected for Further Analysis

Based on the criteria listed previously and the fact that the 2018 EFMP would result in significant and unavoidable impacts related to Transportation/Traffic, the alternatives described below have been determined to represent a reasonable range of alternatives.

The alternatives considered in the Final EIR include the following alternatives to the 2018 EFMP, which are further described in this section.

- Alternative 1: No Project/No Development
- Alternative 2: Medium Growth Rate Alternative

With respect to the No Project alternatives, Section 15126.6(e) of the State CEQA Guidelines requires than a Draft EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a Project with the impacts of not approving that Project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternative: (1) when the Project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan and (2) when the Project is other than a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that Project is not processed (i.e., no development). Both types of no project alternatives are addressed in the Final EIR (refer to Alternatives 1 and 2).

For the build alternatives, it is assumed that regulatory requirements and project-specific MMs identified for the 2018 EFMP would also be implemented with the alternative, and thus serve to reduce or avoid potential significant impacts similar to the Project.

iv) Alternative 1: No Project/No Development

Description: Under the No Project/No Development Alternative, as required by CEQA, no further development would occur at the Mt. SAC campus, including proposed and renovated buildings and infrastructure improvements currently planned in the 2015 FMPU. This No Project alternative is evaluated in accordance with Section 15126.6(e)(3)(A) of the State CEQA Guidelines.

Finding: Mt. SAC rejects Alternative 1: No Project/No Development, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) there would be no roadway or intersection improvements implemented, nor would any improvements be made to support pedestrian circulation and safety, and (2) the alternative fails to meet any of the basic project objectives. Therefore, Alternative 1 is eliminated from further consideration.

Facts in Support of Finding: The No Project/No Development Alternative would avoid most of the potential project impacts from the 2018 EFMP (Phases 1A, 1B, and 2), which are less than significant for each environmental topic with adherence to regulatory requirements and project-specific MMs. It is expected that impacts related to population and housing and public services and recreation would be less than the Project, because although there may be some growth in the on-campus population, it would be limited based on the capacity of the existing facilities. With this alternative, there would be no roadway or intersection improvements implemented, nor would any improvements be made to support pedestrian circulation and safety.

v) Alternative 2: Medium Growth Alternative

Description: The purpose of this alternative is primarily to reduce the amount of traffic generated by the 2018 EFMP. As discussed in Section 3.0, Project Description, of the Final EIR Mt. SAC projects that its annual growth rate will range between 0.18 and 1.22 percent, with a mid-point of 0.75 percent. For purposes of analysis, the Final EIR analyzes the high growth rate of 1.22 percent, therefore this alternative involves implementation of the 2018 EFMP based on a medium

growth rate of 0.75 percent. As noted in Table 3-2 of the Project Description, the full-time equivalent students (FTES) is projected to increase from 13,185 during the fall semester of 2017 to 14,237 FTES under the medium growth rate, compared to 15,055 students under a high growth rate in the fall semester of 2027. The unduplicated student headcount is projected to increase from 37,864 students (during the fall semester of 2017) to 40,802 students under a medium growth rate, compared to 42,745 students under a high growth rate in the fall semester of 2027. Under this alternative, the increase in daily traffic resulting from the 2018 EFMP for the 2027 horizon year would be reduced from 5,613 daily trips with the Project, to approximately 3,379 daily trips.

The Medium Growth Rate Alternative would continue to construct new and renovate existing buildings and structures, thus resulting in a similar impact footprint. The primary difference in anticipated projects would be the need for less parking which could result in smaller structures or elimination of one or more parking structures.

Finding: Mt. SAC rejects Alternative 2: Medium Growth Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) While the Medium Growth Rate Alternative is environmentally superior to the 2018 EFMP, it does not meet the Project objectives to the same extent as the Project; (2) Under the Medium Growth Rate Alternative, the currently approved 2015 FMPU would be updated; however, this alternative would not serve the potential student population to the same extent as the 2018 EFMP. Therefore, the Alternative Medium Growth Alternative is eliminated from further consideration.

Facts in Support of Finding: As described in Section 5.0, Alternatives and summarized in Table 5-2 of the Final EIR, the Medium Growth Rate Alternative would have reduced construction-related impacts compared to the 2018 EFMP (i.e., air quality, GHG emissions, noise, traffic) due to the reduction in daily trips, which would potentially result in a slight reduction of development due to a potential reduction in parking.

Because the site conditions and operations for this alternative are generally the same as the Project (with the potential for a slight reduction parking), physical impacts resulting from this alternative would also be similar to the Project. This alternative would result in a similar magnitude of impacts related to aesthetics, biological resources, cultural resources (archaeology), energy, geology/soils, hazards and hazardous materials and wildfire, hydrology and water quality, land use and planning, population and housing, public services and recreation, tribal cultural resources, and utilities and service systems. However, the impacts from the 2018 EFMP and this alternative would be less than significant.

This alternative would continue to construct new and renovate existing buildings and structures, thus resulting in a similar impact footprint when compared to the Project. The primary difference in anticipated projects would be the need for less parking which could result in smaller structures or elimination of one or more parking structures. Thus, the overall amount of development on campus with the Medium Growth Rate would be similar to the 2018 EFMP.

The Medium Growth Rate would involve demolition of Buildings 17, 18, 19A, 19B, and 20 to accommodate construction of the Student Center and Central Campus Infrastructure and Bookstore, which would continue to result in a significant and unavoidable impact related to demolition of buildings that contribute to the Mt. SAC Historic District.

The Medium Growth Rate Alternative would result in a reduction in trip generation (daily trips, PM peak hour, and AM peak hour). Therefore, this alternative would result in an overall reduction in

operational air quality, GHG emissions, traffic-related noise, and traffic impacts. However, while this alternative would result in an overall reduction in traffic related impacts, a significant and unavoidable traffic impact would occur at one intersection.

The Medium Growth Rate Alternative would achieve the following Project objectives:

2. Implement the facilities, site improvement, and infrastructure needed to support the growth projected for instructional programs and support services at Mt. SAC.
3. Maximize functional space and eliminate non-functional space on campus, including by removing and replacing temporary facilities with permanent facilities in a timely manner, and renovating or replacing aged and outdated facilities.
4. Improve the utilization of space on campus by replacing small single-story buildings with multi-story buildings and consolidating open space into usable-sized portions.
5. Improve the efficiency of space on campus by aligning the classroom inventory with class sizes, and building flexible, multi-use/multi-purpose spaces, and spaces that can be readily reconfigured by occupants.
6. Ensure safety of faculty, staff, and students by upgrading or replacing aging, seismically unsafe buildings and facilities.
7. Promote sustainable facilities design, construction, and operations.
8. Improve pedestrian and vehicular access and circulation on campus.
9. Upgrade classroom and laboratory spaces to provide students with up-to-date skills and modern technology.
10. Upgrade school security to keep students safe by installing emergency mass notification beacons and marquees, outdoor lighting, and up-to-date security measures including improved security and emergency communication systems and infrastructure.

The following project objective would not be met to the same extent as the 2018 EFMP:

1. Provide an affordable local alternative to four-year universities for local students and returning veterans.

The Medium Growth Rate Alternative would involve a reduction in FTES and unduplicated student headcount, which would reduce opportunities to serve the anticipated student demand. Because the Medium Growth Rate Alternative would limit the number of students enrolled at Mt. SAC, a portion of the potential student population would be forced to either seek education elsewhere or forgo their educational experience. The Medium Growth Rate Alternative would, however, continue to involve construction of new, and renovation of existing, buildings and structures, thus resulting in a similar impact footprint in comparison to the 2018 EFMP. The primary difference with the Project would be the need for less parking which could result in smaller structures or elimination of one or more parking structures.

3. Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that if the No Project Alternative is the environmentally

superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Table 5-3 provides, in summary format, a comparison of the impacts for each alternative to the Project. Table 5-3 identifies whether the respective alternatives would have similar, reduced (less), or greater impacts compared to the 2018 EFMP's impacts.

The No Project/No Development Alternative has the least impact to the environment because it would not involve any construction activities and would not involve any increase in the amount of educational, recreational, and support uses on campus. There would be no construction-related impacts, and no change in the physical conditions of the campus from the No Project/No Development Alternative. It is expected that there could still be an increase in the student population with this alternative, and an associated (and slight) increase in demand for public services, utilities, and potentially traffic and related air quality, GHG and noise impacts. It should be noted that any traffic impacts associated with the No Project/No Development Alternative would not be subject to mitigation; therefore, impacts could be greater than with the Project. While this alternative would reduce most of the 2018 EFMP's less than significant effects, none of the Project objectives would be met.

The Medium Growth Rate Alternative has been identified as the environmentally superior alternative. As shown in Table 5-3, of the Final EIR, the Medium Growth Rate Alternative would have less overall impacts than the Project. It would have "less" impacts for four impact categories, compared to the 2018 EFMP. The Medium Growth Rate Alternative has less impacts related to traffic-related impacts (including air quality pollutant and GHG emissions and noise). However, the Medium Growth Rate Alternative would have the same significant and unavoidable impacts as the Project as it relates to Cultural Resources (historical resources) and this significant and unavoidable impact would not be avoided.