

August 29, 2016

Ms. Mikaela Klein Mt. San Antonio College 1100 North Grand Avenue Walnut, CA 91789

RE: Responses to Comments on Mt. SAC 2015 Facilities Master Plan Update (FMPU) and Physical Education Projects Traffic Impact Study

Dear Ms. Klein:

I have reviewed the comments provided by the City of Walnut letter dated July 28, 2016. The responses are provided in the following table.

	City of Walnut (Kunzman letter)		
	Comment	Response	
6-2.36	General Comment: The Traffic Impact Study appendices only contain partial information as provided in the 2015 Facilities Master Plan Update and Physical Education Projects, Appendices – Volume 2 of 2 (June 2016). The complete set of appendices for the Traffic Impact Study should be included in the publicly available documentation.	The Draft Traffic Impact Study Technical Appendices A – D have been forwarded for your use.	
6-2.37	General Comment: The project description indicates that the 2015 Facilities Master Plan Update, compared to the 2012 Facilities Master Plan, includes a redesign of the athletic facilities, relocation of the Public Transportation Center, expansion of the Wildlife Sanctuary and Open Space Area, a pedestrian bridge across Temple Avenue, a net increase in buildout square footage, and continuation of special annual events. The project description also indicates that the District is filing an application to host Olympic track and field trials in year 2020. It should be noted, the Traffic Impact Study only evaluates the traffic impacts associated with additional trips generated by a net increase in enrollment of 3,745 students by year 2020 and 7,153 students by year 2025 (compared to existing 2015 conditions). Traffic impacts associated with other aspects of the project description appear to have been evaluated in a separate document.	The comments are informational and do not discuss new significant effects of the project. No additional response is required.	

	General Comment: The study area consisting of 19 intersections appears appropriate based on the project trip generation and trip distribution forecasts.	The comments are informational and do not discuss new significant effects of the project. No additional response is required.
6-2.38		The sentence on page 96 of the Draft EIR stating "The CMP criteria of adding 50 trips to any one movement of an intersection was used to identify the nineteen (19) study intersections (Exhibit 3.4)" is hereby omitted in the Final EIR. The CMP criteria applies to CMP arterial monitoring intersections only, not to any intersection. Of the 164 CMP arterial monitoring intersection in Los Angeles County, none are within the study area.
6-2.39	List of Figures: There are several inconsistencies between the titles shown in the List of Figures and the titles shown on the actual figures. For example, Figure 1 is shown as "Project Location and Study Intersections" in the List of Figures, but Figure 1 is titled "Study Area".	The Traffic Impact Study report (September 1, 2016) contains the figure titles consistent with the titles identified in the List of Figures within the Table of Contents. No new significant effects would result upon incorporating this comment into the traffic study.
6-2.40	Figure 1, Study Area: Study intersection #2 is incorrectly shown at Creekside Drive/Amar Road instead of Lemon Avenue/Amar Road.	The correct intersection location is shown in Figure 1 of the Traffic Study (April 1, 2016) and any other figure where the location was incorrectly shown, and included in the Final Traffic Impact Study (September 1, 2016).
6-2.41	Pages 3/4, Roadway Configurations: The description for Amar Road/Temple Avenue states that on-street parking is prohibited; on-street parking is permitted along Temple Avenue between Mt. SAC Way and Bonita Avenue. Mountaineer Road terminates at Grand Avenue at the west end, not the east end as stated. Baker Parkway terminates at Grand Avenue at the east end, not the west end as stated.	These edits are included in the Roadway Configurations section of the Final Traffic Impact Study (September 1, 2016). No new significant effect would result upon incorporating this comment into the traffic study.
6-2.42	Page 8, Table 2 – Intersection Level of Service Definitions - HCM Methodology: The source noted in the footnote of Table 2 appears to indicate the 2000 Highway Capacity Manual methodology was used to analyze intersections under Caltrans' jurisdiction. The latest version (2010) of the Highway Capacity Manual delay methodology should be used for delay calculations. Additionally, Table 2 should show the delay ranges for unsignalized intersections since the unsignalized study intersection of Lot F/Temple Avenue is also analyzed using the Highway Capacity Manual delay	Table 2 in the Final Traffic Impact Study (September 1, 2016) includes delay ranges for unsignalized intersections. No new significant effect would result upon incorporating this comment into the traffic study. The traffic analysis was conducted using TRAFFIX software which is an acceptable software package by Caltrans guidelines. TRAFFIX software applies the
	methodology.	HCM 2000 methodology, not HCM 2010. In order to maintain consistency with the analysis of the non-Caltrans intersections, TRAFFIX was used at the Caltrans intersections. Since the 2010 methodology would be applied to both existing and plus project scenarios, no new significant effect would result upon incorporating this comment into the traffic study.
6-2.43	Page 9, Table 3 – Intersection Significant Impact Criteria: It should be noted that Table 3 shows the thresholds of significance for corresponding Levels of Service based on "with project" conditions, whereas the Los Angeles County Public Works Traffic Impact Analysis Report Guidelines (January 1997) defines intersection thresholds of significance based	As noted, the criteria used in the Traffic Impact Study (April 1, 2016) is the more stringent criteria. If the intersection "pre-project" condition was used to determine the thresholds of significant instead of the "with project", the following changes would result:

	on "pre-project" conditions. While inconsistent with the Los Angeles County guidelines, the thresholds of significance used in the Traffic Impact Study are more stringent based on the scenarios analyzed.	- Table 7: #14 Mt SAC/Temple. This intersection would no longer be impacted in the 2020 E + P scenario - Table 16: #15 Bonita/Temple. This intersection would no longer be impacted in the 2025 E + P + C scenario The MTA guidelines do not conform with the judicial ruling in CEQA cases where an existing plus project analysis is required. The current criteria in Table 3 matches the judicial requirement. See pages 95-96 in the Draft EIR.
6-2.44	Figure 3 - Existing Intersection Lane Configuration: Nogales Street/Amar Road (#1) incorrectly shows one additional westbound through lane.	This lane configuration has been corrected in the Traffic Impact Study (September 1, 2016). Incorporating the revised lane configuration, the overall results of the analysis remain unchanged. No new significant effect would result if the comment were incorporated in the traffic study.
6-2.45	Figure 3 - Existing Intersection Lane Configuration: It should be noted that the eastbound approach at Grand Avenue/I-10 Eastbound Ramps (#4) has been restriped to consist of one left-turn lane and one right-turn lane.	The Draft EIR needs to describe existing conditions at the time the Notice of Preparation was issued (i.e. January 19, 2016). The existing information in the Traffic Study (April 1, 2016) was correct when the traffic study commenced and the field survey was completed. Several changes have occurred since that date and are acknowledged herein.
6-2.46	Figure 3 - Existing Intersection Lane Configuration: It should be noted that the northbound approach at Grand Avenue/SR-60 Eastbound Ramps (#13) has been restriped to consist of two through lanes and one shared through/right-turn lane (identified as a mitigation measure); the southbound approach has been restriped to consist of one left-turn lane and three through lanes.	See Response 6.2.45 above.
6-2.47	Figure 3 - Existing Intersection Lane Configuration: It should be noted, that the southbound approach at Valley Boulevard/Temple Avenue (#17) has been restriped to consist of one left-turn lane, one through lane, one shared through/right-turn lane, and one right-turn lane.	See Response 6.2.45 above.
6-2.48	Page 13, Table 5 - 2020 Project Trip Generation: The inbound and outbound trips generated during both peak hours are incorrectly calculated based on the in/out percentages shown. The AM peak hour should equal 377 inbound trips and 72 outbound trips. The PM peak hour should equal 283 inbound trips and 166 outbound trips.	The discrepancy in Inbound and Outbound trip generation is due to the method by which the trips were rounded. The total trip generation shown in the study is correct and would remain unchanged. No new significant effect would result if the comment were incorporated in the traffic study.
6-2.49	Page 13, Table 6 - 2025 Project Trip Generation: The inbound and outbound trips generated during both peak hours are incorrectly calculated based on the in/out percentages shown. The AM peak hour should equal 721 inbound trips and 137 outbound trips. The PM peak hour should equal 541 inbound trips and 317 outbound trips.	See Response 6.2.48 above.
6-2.50	Figure 5, 2020 Project Trip Assignment: Several intersection turning movements appear incorrect based on the project trip distribution percentages shown on Figure 4. For example, based on Figure 4, it would appear that the northbound right-turn movement at Nogales Street/Amar Road (#1) should equal	The project trip distribution percentages shown on Figure 4 represent approximate rounded percentages at the study intersections. However, the reason for potential confusions is that the analysis assumes some small trip distribution percentages to other

	15 AM peak hour trips (375 inbound AM peak hour project trips X 4% = 15). If the project trips have been improperly assigned to the study intersections, all subsequent analysis scenarios will also require revision.	streets that provide access to neighborhood/residential areas, via intersections that are not part of the 19 intersections studied in the analysis. These streets included Creekside Drive (between Nogales Street and Lemon Avenue), Shadow Mountain Road (between Cameron Drive and Mountaineer Road), and Snow Creek Drive (between Temple Avenue and La Puente Road). These percentages were not shown on Figure 4 but are correctly accounted for in the assignment of project trips shown on Figures 5 and 6 in the Traffic Study (April 1, 2016).
		Detailed trip distribution percentages can be added to Figure 4 to more clearly match the trip assignments shown on Figures 5 and 6. The added details to Figure 4 would be purely aesthetic, though, and would not result in changes to the intersection LOS analysis because the project trip assignments are correctly distributed. Thus, the clarifications do not have any new significant effects to the results of the analysis. Therefore, the changes are not being completed.
6-2.51	Figure 6, 2025 Project Trip Assignment: Several intersection turning movements appear incorrect based on the project trip distribution percentages shown on Figure 4. For example, based on Figure 4, it would appear that the northbound right-turn movement at Nogales Street/Amar Road (#1) should equal 29 AM peak hour trips (715 inbound AM peak hour project trips X 4% = 29). If the project trips have been improperly assigned to the study intersections, all subsequent analysis scenarios will also require revision.	The project trip distribution percentages shown on Figure 4 represent approximate rounded percentages at the study intersections. However, the reason for potential confusions is that the analysis assumes some small trip distribution percentages to other streets that provide access to neighborhood/residential areas, via intersections that are not part of the 19 intersections studied in the analysis. These streets included Creekside Drive (between Nogales Street and Lemon Avenue), Shadow Mountain Road (between Cameron Drive and Mountaineer Road), and Snow Creek Drive (between Temple Avenue and La Puente Road). These percentages were not shown on Figure 4 but are correctly accounted for in the assignment of project trips shown on Figures 5 and 6 of the Traffic Study (April 1, 2016).
		Detailed trip distribution percentages can be added to Figure 4 to more clearly match the trip assignments shown on Figures 5 and 6. The added details to Figure 4 would be purely aesthetic, though, and would not result in changes to the intersection LOS analysis because the project trip assignments are correctly distributed. Thus, the clarifications do not have any new significant effects to the results of the analysis. Therefore, the changes are not being completed.
6-2.52	Page 22, first paragraph: The intersection of Grand Avenue/La Puente Road should indicate a significant impact during both the AM and PM peak hours.	This is a discrepancy between the analysis results shown in table and the paragraph that follows. No new significant effect would result upon incorporating this comment into the Traffic Study (September 1, 2016).

Page 54, Congestion Management Program Analysis (CMP): The Los Angeles County Guidelines for CMP Transportation Impact Analysis (CMP Appendix D) state that projects must consider transit impacts as defined in Section D.8.4 even if no CMP arterial intersections or freeway locations are identified for analysis; however, the Traffic Impact Study does not provide an assessment of transit impacts.

While there is not a specific section devoted to transit in the current traffic study, project impacts of prior and the current master plans has been extensively discussed in the prior and current Final EIRs. Section 3.8: Transit Services in the 2012 FMP Final EIR includes an evaluation of transit impacts and recommended mitigation measures.

As shown in Table 3.8.1 of the certified 2012 FMP Final EIR, 17 – 21 public transit buses per hour serve the campus and close to 288 MTA and Foothill Transit buses serve the campus daily.

In the 2015 FMPU & PEP (Phase 1, 2) transit issues are discussed more than 70 times, including evaluations on pp. 106-107, 173 and 489. The 2016 Mitigation Monitoring Program (Appendix D1) includes twelve mitigation measures for transit issues, including TR-07, TR-41 to TR-48, TP-03, TP-11 and TC-01. As a Program EIR, the evaluation in past and the current EIR, is adequate and sufficient for evaluation of transit issues.

The 2015 FMPU includes development of a Public Transportation Center (PTC) in Lot D3. Since the Center has not been designed, additional CEQA evaluation is required at the site-specific planning stage when the Center, new traffic signal plans on Temple Avenue and public transit changes are known. Until the site plan and transit information is available, any additional analysis would be speculative.

As stated in the Draft EIR, in the 2015 Fall Term, Foothill Transit Agency had 11,024 active Go Pass transit users and issued 17,681 cards to registered students. The Agency provided 100,730 rides to students in September 2015 and 104,987 rides in October 2015.

There is no evidence that an increase in student enrollment of 3,745 in 2020 will result in significant impacts on public transit services for the campus. Both providers have ample resources and equipment to adjust and expand transit resources if demand increases.

Based on LA County CMP guidelines for evaluating a project's impact to transit, a total of 22 new transit trips during each peak hour due to the 2015 FMPU is forecast for 2020, calculated as such:

449 peak hour vehicle trips * 1.4 persons per vehicle = 629 person trips 629 person trips * 3.5% transit usage = 22 peak hour

6-2.53

transit trips.
The 22 peak hour transit trips do not result in a significant effect. Therefore, the existing CEQA documentation and recommended mitigation measures are sufficient for the 2015 FMPU and PEP (Phase 1, 2) projects transit impacts.

If any additional information is required, please feel free to contact me at 213.802.1715.

Sincerely,

Iteris, Inc.

Deepak Kaushik

Senior Transportation Engineer