State Clearinghouse Number 2002041161

Physical Education Project (Phase 1, 2)

Subsequent Program/Project Final EIR to
2015 FMPU/PEP FINAL EIR (SCH 2002041161)

Volume 3
Response to Public Comments on the Draft EIR

MT. SAN ANTONIO COLLEGE
Facilities Planning and Management
Walnut, California

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July 2017

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TABLE OF CONTENTS

		Page
1.0	Evaluation of Response to Comments Guidelines	1
2.0	Public Review Periods and Public Notices	1
3.0	State Agency Comments with District Responses	2
4.0	Local Agency Comments with District Responses	2
5.0	Interested Groups Comments with District Responses	43
6.0	Individual's Comments with District Responses	47
7.0	New Information Added to the Draft EIR	47
8.0	Revised Information in the Draft EIR	47
9.0	Appendices	49
A.	Notices	
B.	Comments on Draft EIR	
C.	New Information	
D.	PEP Mitigation Monitoring Program	
E.	Additional Correspondence	

Physical Education Project (Phase 1, 2)
Response to Public Comments

July 28, 2017

Section 1.0: Evaluation of Response to Comments Guidelines

Section 15088 of the CEQA Guidelines states the following requirements:

(a) The Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

(b) The Lead Agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

(c) The written response shall describe the deposition of significant environmental issues raised (e.g. revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be a good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

(d) The Response to Comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the Lead Agency should either:

(1) Revise the text in the body of the EIR, or
(2) Include marginal notes showing that the information is revised in the Response to Comments.

Section 2.0: Public Review Period and Public Notices

The Physical Education Project (Phase 1, 2) Draft Subsequent EIR, dated May 2016, was circulated locally for public review for forty-five days from May 19, 2017 to July 3, 2017. The Draft EIR was forwarded by the Mt. San Antonio Community College District (the "District") to the State Clearinghouse, seventeen (17) federal/state/local agencies and to three (3) interest groups.

The Notice of Completion (NOC) was filed with the State Clearinghouse (SCH) on May 19, 2017. The SCH review period was also from May 19, 2017 to July 3, 2017. The Governor's Office of Planning and Research correspondence of July 5, 2017 indicates the District has complied with all State Clearinghouse CEQA review requirements. A list of State Agencies receiving the DEIR is provided herein.

Copies of the NOC were also forwarded to the cities of Covina, Diamond Bar, Industry, Pomona, San Dimas, Walnut, West Covina, County of Los Angeles Department of Public Works, Los Angeles Metropolitan Transit Authority, Foothill Transit Agency, Cal Poly Pomona, Walnut Valley Unified School District, South Coast Air Quality Management District and to other local concerned agencies. Copies were also sent to the Walnut Public Library, Pomona Public Library and to the Mt. San Antonio College Library.

The Notice of Completion (NOC) was published in two local newspapers with area geographical coverage; the Inland Valley Daily Bulletin and the San Gabriel Valley Tribune on May 19, 2017. The Notice of Public Hearing for August 9, 2017 was published in the same newspapers on July 28, 2017.

The proofs of publication are included in Appendix B.

The Notice of Completion of an Environmental Impact Report (NOC) was filed with the County of Los Angeles Registrar/Recorder/Clerk on May 19, 2017. Copies of all Notices, indicating proof of filing or publishing, are included in Appendix B.

The custodian of the documents and other materials that constitute the record of proceedings for the Final EIR is Rebecca Mitchell, Manager, Facilities Support Services, 1100 North Grand Avenue, Walnut, California 91789. Ms. Mitchell may be reached at (909) 274-5175 or at facilitiesplanning@mtsac.edu.

The Final EIR consists of four documents, the Draft EIR (Volume 1), Draft EIR Appendices (Volume 2), Response to Public Comments (Volume 3), and Response to Comments Appendices (Volume 4).

Comments on the Draft EIR were received from the City of Walnut, and from United Walnut Taxpayers. No regional, state or federal agencies provided comments on the Draft EIR.

Section 3.0: State Agency Comments with District Responses

No comments were received from state agencies. The State Clearinghouse issued a "compliance letter" to the District dated July 5, 2017.

Section 4.0: Local Agency Comments with District Responses

4.0 City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

Comment 4.1.1: *Section 7.0 Alternatives Analysis. The purpose of an alternatives analysis is to determine whether there is an environmentally superior alternative that will meet most of the Project's objectives. Consequently, a complete list of Project Objectives for the PEP (Phases 1, 2) is needed for analysis of the Project and each alternative. It is unclear from the discussion whether these alternatives 'would feasibly attain most of the basic objectives of the project' (CEQA Guidelines 15126.6).*

The analysis in these sections should also specifically address whether the alternatives 'would avoid or substantially lessen' (15126.6) each of the six (6) impacts identified as unavoidable and adverse in Section 7.0. The unavoidable adverse impact associated with Land Use and Planning, and how the alternative affects Land Use and Planning, should be discussed under each alternative. The conclusion in the SEIR is ambiguous and not adequately supported by substantial evidence as to whether Alternative 1 Revise Physical Education Project 2020 or Alternative 2 No Olympic Trials and Field Training is considered the Environmentally Superior Alternative.

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

Response 4.1.1: This is a subsequent EIR and it need address only those issues that were not adequately addressed in the 2015 FMPU/PEP EIR. See Response R59 below for revisions in the alternatives discussion. Revisions in the text were needed to be consistent with the matrix. Alternative 1 is designated the environmentally superior alternative in Table 7.1. The no-project alternative is explicitly rejected in the discussion on page 116. The PEP project objectives were stated in Section 2.3 and Table 2.2 of this EIR, as well as in the NOP and NOC. Statements concerning the project objectives are repeated nine times in Section 7.0. With respect to Land Use and Planning, the PEP is exempt from City of Walnut land use and planning controls under Government Code section 53094 and Board Resolution 16-03 adopted October 12, 2016.

CEQA clearances for demolition activities onsite were obtained upon certification of the 2015 FMPU/PEP Final EIR. Construction and grading quantities were specified in Table 3.8.4 and all demolition and construction impacts were evaluated, including air quality, greenhouse gases, and noise and traffic impacts. The Final EIR also included a truck haul plan for earth export in Section 3.8.2. Consultation with the City of Walnut occurred prior to demolition, and demolition of the stadium was based on city agreements under their health and safety abatement regulations for vacant structures and did not require City review or approval.

Demolition of the existing stadium does not preclude projects other than the PEP from being constructed onsite. The primary issue addressed in this Subsequent EIR is the project impact on two intersections in the City of Pomona. Since the District is not subject to the City's zoning, further analysis of project alternatives impact on zoning is not relevant. The zoning issue is one of inconsistency between the City's General Plan, Zoning and the historic use of the campus. The District has its own land use zones for the campus.

On June 28, 2017, it was announced that the USTFA Board of Directors voted to award the 2020 Olympics Track & Field Trials to Mt. San Antonio College. The Olympic Trials are currently scheduled to take place June 19-28, 2020.

Comment 4.1.2: *Environmental and Project Baseline. The PEP (Phases 1, 2) Project SEIR fails to establish a current, stable environmental baseline for purposes of identifying significant impacts. Although the baseline for an EIR is typically established under CEQA to coincide with issuance of the NOP, the conditions at the Project site have changed substantially with the demolition of the stadium after the NOP was published (Exhibit No. 1). With the current SEIR, the baseline should be existing site conditions with the demolition of the stadium. In numerous instances, the SEIR refers the reader to any of a series EIRs dating from the Final Program EIR certified in December 2002 with Supplemental or Subsequent EIRs in 2005, 2008, 2012 and 2016[1]. The SEIR refers the reader to earlier documents with the assertion that 'conditions have not changed', without providing evidence of what those conditions are in 2017. It is obvious that conditions on the site have changed, because the stadium has been demolished. The changing frame of reference throughout this section for dates of relevant plans, projects and enrollments is confusing, as is the true baseline for evaluation of impacts within this SEIR. A consistent baseline is needed for existing conditions, including campus buildings, projected building activity, enrollment, and environmental setting.*

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

Response 4.1.2: The baseline is established when the NOP is issued**.** As a Subsequent EIR, the existing conditions need not be re-examined in detail when the 2015 FMPU/PEP EIR was certified in October 2016 and the NOP for the Subsequent issued in May 2017. Section 2.1 establishes the existing conditions, as well as the analysis in each section of the EIR (i.e. Section 3.0). This EIR selectively incorporates by reference limited material from previous District EIRs. While there are multiple references to prior EIRs (i.e. Section 2.2 etc.) material is not incorporated into this EIR from the 2002, 2005, 2008 EIRs, as suggested.

The City was consulting prior to demolition of the stadium. Demolition of the stadium was based on city agreements under their health and safety regulations for vacant structures (See Response 4.1.1). Since the facilities were not in use, there is little difference between a baseline that includes the empty facilities and a basement with the facilities removed.

Comment 4.1.3: *Construction Impacts. Additional project-level construction information is needed to adequately assess traffic, noise and air quality impacts to surrounding public roadways and residential neighborhoods. Although actual construction schedules may differ from time frames identified in this*

SEIR, a project-level analysis of the PEP (Phases 1, 2) requires 1) earthwork quantities, 2) a grading plan 3) an exhibit that provides a timeline (or series of timelines) representing a best current estimate for site preparation, grading and construction for Phases 1 and 2, and the individual projects included within these phases, and 4) current haul plan. These exhibits are needed to provide an adequate project-level assessment of impacts for construction traffic, grading and haul, air quality, noise and other issues.

Response 4.1.3*:* The comments do not acknowledge that the document is a Subsequent EIR. A project-level analysis of the topics listed was included in the 2015 FMPU/PEP EIR, including a project schedule that assumed Phase 1 was completed by August 2018 and Phase 2 by August 2020. A truck haul plan was included in Section 3.8.2 on p. 331 of the same document. The traffic, air quality and noise sections in the 2015 FMPU/PEP EIR fully evaluated project impacts on public roadways and residential neighborhoods. The area circulation network identified in Exhibit 3.4 indicates the broad geographical area studies for the traffic, air quality and noise sections.

Comment 4.1.4: *Excessive Reliance Upon 2015 FMPU EIR and Other CEQA Documents. The draft SEIR is described as a 'unique' combination of Program EIR, Subsequent EIR and Project EIR in a single document. The SEIR falls short of adequately meeting the purposes of each of these three different types of EIRs as described in CEQA Guidelines Sections 15168, 15162, and 15161. In tiering and streamlining the CEQA review, the document is overly selective and focused in its disclosure of PEP Phase 1 and 2 impacts. The EIR repeatedly references back to the 2015 FMPU Program EIR/Subsequent PEP Project EIR without providing proper context for impact findings. In relying on these earlier documents, the SEIR also fails to provide sufficient project-level information and analysis to be an adequate project-level analysis document (see previous comment). Additionally, because the SEIR references the 2015 FMPU EIR, and the 2015 FMPU EIR references any of a series of EIRs dating back to 2002, the characterization of the baseline for environmental resources as well as the impacts of the PEP Phase 1 and 2 impacts are unclear and confusing. One of the basic purposes of CEQA is to 'inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities' (CEQA Guidelines Section 15002). The SEIR fails to provide a clear description of the environmental effects of the PEP Phase 1 and 2 Project.*

Response 4.1.4: As a subsequent EIR, it is entirely appropriate that the analysis rely on the 2015 FMPU/PEP EIR. A Subsequent EIR need analyze only those issues that were not adequately evaluated in the prior CEQA documentation. The current document should focus on disclosures of PEP impacts. There is no evidence supporting the assertion that the document is "overly selective" or "does not provide sufficient project-level information." The City has established a pattern of general assertions that the information provided is not sufficient, requesting additional information and then maintaining the information provided is too extensive, confusing and beyond their comprehension. Key examples of the District providing adequate information are the continual updating of traffic, biological resources, noise and air quality baseline information in its documents.

Comment 4.1.5*: Lack of Comprehensive Summary of Impacts and Mitigation Measures. The segmentation and partial disclosure of Impacts and Mitigation Measures in Table 1.2 and throughout the SEIR frustrates a clear understanding of all environmental impacts and proposed Mitigation Measures for the PEP (Phases 1, 2). A consolidated summary table is needed that identifies all impacts and proposed mitigation measures. Again, this deficiency in the SEIR does not meet the basic purpose of CEQA to inform decision makers and the public (CEQA Guidelines Section 15002).*

Response 4.1.5: Table 1.2 identifies all significant impacts and recommended mitigation measures for both phases of the project. The assertion that there are other impacts and required mitigation measures are not supported by evidence of fact. A comprehensive list of project impacts for the 2015 Facility Master Plan was included in Appendix G1. The EIR has complied with the requirements for a Subsequent EIR.

Comments 4.1.6: *Limited Geographic Scope of Cumulative Impact Analysis. The SEIR assertion that the geographical area for analysis of impacts other than traffic (i.e. aesthetics, air quality, biological*

resources, cultural resources, energy, geology/soils, greenhouse gases, historical resources, parking, public services, water quality, etc.) is limited to the College campus is sweeping and made without supporting evidence. The campus is surrounded by residential areas representing sensitive local receptors for air quality, noise, visual impacts on the north, west and south. Air quality impacts are regional in scope.

Response 4.1.6: The statement itself needs no justification; it is an explanation of what has generally occurred in the EIR cumulative analysis and is readily apparent by examining the studies themselves or the analysis in the EIR. The focus of cumulative analysis for the topics cited as the campus is also appropriate for a project that is limited in scope and has no significant impact within a regional context.

When appropriate, the analysis has evaluated project impacts on the residential areas impacts. However, no new projects are located in the immediate vicinity of the campus.

The comments appear to confuse concerns for project impacts with cumulative impacts. In the context of regional cumulative impacts other than traffic or air quality, the project cumulative impacts are no impact, or less than cumulatively considerable. Please re-examine the cumulative analysis in each topical section of the EIR.

Comments 4.1.7: *Land Use and Zoning Regulations. The Mt. SAC campus is located wholly within the City's boundaries. Nevertheless, the College has demonstrated a pattern of ignoring the City's zoning, grading, and haul route regulations. The alleged exemption from the City Zoning Ordinances approved by the Board by Resolution No. 16-03 on October 12, 2016 is beyond the scope of Government Code Section 53094 because it relates to non-classroom facilities. The SEIR's identification of relevant regulations should include the Walnut General Plan and Walnut Municipal Code. The District should acknowledge that the 2015 FMPU and PEP propose uses that will not be "directly used for or related to student instruction" and are not exempt from the City's Zoning Ordinance. The College should engage in proper land use regulatory and entitlement processing in compliance with City land use requirements.*

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

Response 4.1.7: The PEP project certainly relates to student instruction and includes classrooms as well as other athletic facilities and Resolution No. 16-03 is a proper exercise of discretion by the Board of Mt. SAC. The relationship between the facilities and the educational programs of the Athletic Division were set forth in Section 2.4 of the 2015 FMPU/PEP EIR, and is readily apparent in the facilities included in the project. The issue of land use jurisdiction and zoning is included in the current litigation before the Superior Court and will be resolved therein. Mitigation measure LU-07 acknowledges the City's limited authority for review and approval of campus grading plans under Government Code section 53097 related to the design and construction of onsite improvements.

LU-07. The District shall submit an application for a grading plan to the City of Walnut for all projects subject to the Walnut Municipal Code Sections 6-5.5 and 6-5.6. The grading plan shall confirm to the requirements of the Walnut Municipal Code Section 6-5.3 and Appendix J Sections J101.7, J108 - J111 of Appendix J. To the extent there is any ambiguity as to scope, the WMC controls over Appendix J. The District shall comply with all requirements of an approved grading plan. Facilities Planning and Management shall ensure compliance.

Comments 4.1.8: *Tribal Cultural Resources. The statement that the PEP site has no established cultural tribal value is apparently based on Native American consultation conducted in 2014 and reported in the 2015 FMPU EIR. However, to properly address Item e, there must be evidence of compliance with AB 52, a formal consultation process requiring notification to Native American tribes who have requested consultation under AB 52. The purpose of the AB 52 consultation process is to identify Tribal Cultural Resources that could be impacted by the Project. AB 52 consultation is required for all CEQA documents for which a notice of preparation (NOP) is filed for an ND, MND, or an EIR after July 1, 2015. Since the*

NOP for the 2017 EIR was filed in April 2017 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. I t is possible that no tribes requested consultation under AB 52, but if this is the case, this must be stated in the EIR.

Response 4.1.8: The comments regarding AB 52 are noted. There has been no formal request for consultation under AB 52 to date on this project. A search of the Sacred Lands File (SLF) from the Native American Heritage Commission (NAHC) in June 2014 for the campus found no SLF resources existed. The NAHC provided a list of regional Native Americans with an interest in the region and letters were sent to all of the listed tribes and individuals.

ASM Affiliates contacted the Tongva Nation (TATTN) and the Kizh Tribal Nation (KTN) in March 2015 during preparation of the 2015 FMPU/PEP EIR. TATTN requested more information on the PEP project in March 2016 and they requested involvement in monitoring for geo-testing and arch (i.e. archaeology) testing. The Kizh Nation also requested a Native American monitor be onsite during grading in March 2016 and July 2016. All correspondence was included in Appendix H of the 2015 FMPU/PEP EIR and Appendix A of the 2015 FMPU/PEP Response to Comments. No additional correspondence has been received from the tribes for the PEP project to date.

AB 52 Consultation is a specific process separate but related to the comments received on CEQA Notices and comments on a Draft EIR. The District is proceeding to complete consultation with the tribes who request AB 52 consultation and respond to request for information related to CEQA notices and District CEQA documents.

Comments 4.1.9: *Draft 2017 Mitigation Monitoring Plan. This provides a list of mitigation measures only. Where feasible mitigation exists which can substantially lessen the environmental impacts of a project, CEQA requires those feasible mitigation measures be adopted. All mitigation measures required in the SEIR must also be fully enforceable and certain to occur. Here, the SEIR cites only minimal mitigation for the Project's significant impacts, and that mitigation proposed is vague, uncertain to occur, and unenforceable. Assurance of the ability to implement and enforce these measures is needed. Information needs to be added to each of the remaining columns, including Other Agencies/Firm Involved, Timing, Date Completed, and Responsible Party/Signature.*

Response 4.1.9: The assertions regarding the District's ability and effectiveness in implementing its adopted mitigation measures are noted. If outside agencies are involved in implementation of a mitigation measure, it is noted in the measure. The District's format include other firms/agencies involved, date completed and responsible party signature columns (Appendix D-1). The assertion that the mitigation measures are "minimal, vague and unenforceable" is speculative at best, and unsupported by fact. Therefore, no further response is required.

Comments 4.1.10: *Quality Control. Throughout the Draft EIR document there are numerous instances of sentences with words missing and incomplete sentences that, in some cases, bear on the intent of the authors. A careful proof reading of the document to clarify these sentences is needed with the Final EIR (i.e. Errata). Several of the exhibits are unreadable at their current resolution, format and scale.*

Response 4.1.10: The comments are noted and changes will be made when required.

Comment 4.1.11 – 4.1.74: *The comments in the ECORP Environmental Summary Matrix in Attachment A are included below, along with the District response in the second column. If an expanded response is is provided by the District's technical consultants for traffic, noise, air quality/GHG review, geology, cultural resources and biology (i.e. Responses to Comments 4.1.12 – 4.1.17 in ECORP Attachments A – G) the additional response will be referenced in Table 4.1.10 with the index in the Attachments responses.*

The CEQA Guidelines (Section 15204) specify the requirements for the focus of review of a Draft EIR:

(a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the

project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Table 4.1.10: ECORP Comments & District Responses

ECORP Comments	**District Response**
1. The PEP and Program/Project SEIR continue to be a moving target, making establishing a stable environmental baseline for purposes of identifying significant impacts difficult. The baseline for an EIR is typically established under CEQA to coincide with issuance of the NOP. With the current SEIR, that is April 2017. However, since publication of the NOP, the stadium has been demolished and significant grading has occurred on the site. In numerous instances, the SEIR refers the reader to any of a series EIRs dating from 2002-2016. The SEIR refers the reader to earlier documents with the assertion that 'conditions have not changed', without providing evidence of what those conditions are in 2017. In fact, conditions have changed significantly, because the stadium has been demolished and substantial grading has occurred on the site.	R1. The reasons for why a Subsequent EIR was prepared for the project are clearly explained in the EIR and the PEP is well defined. The demolition of the stadium began in April 2017 and significant grading has not occurred on the site since the 2015 FMPU/PEP was certified. Demolition of the stadium was based on city agreements under their health and safety abatements for vacant structures. See Response 4.1.1. While 2002, 2005, and 2008 EIRs are referenced in the history of the project, material is not incorporated from these earlier documents. The 5-month period between certification of the 2015 FMPU/PEP Final EIR and issuance of the NOP had no significant changes in the baseline for the project. Demolition of the stadium was authorized upon certification of the 2015 FMPU/PEP EIR and its absence does not significantly change the existing baseline environment for the PEP project. Demolition did not require any City review or approval and does not preclude other projects on the stadium site.
2. The site-specific PEP environmental baseline has changed since issuance of the NOP in April 2017 with respect to demolition and grading activities that have since occurred at the Hillman Stadium site. Hillman Lodge Stadium has been demolished. These changed conditions are not clearly identified in the Draft SEIR and project-level impacts associated with these activities (i.e. air quality, noise, haul truck routes, aesthetics) are not specifically addressed. The Final SEIR needs to update this Draft SEIR with respect to existing conditions, and any changes to impact conclusions as a result of changed conditions.	R2. See Response R1. The demolition of the stadium did not create significant air quality, noise, aesthetics impacts or significant service declines for any truck hauling from the site. Demolition of the stadium was quantified in Tables 3.8.4 of the 2015 FMPU/PEP EIR and a truck hauling plan was included in Section 3.8.2. Demolition of the stadium was based on city agreements under health and safety abatements for vacant structures. See Response 4.1.1.
3. Throughout the Draft EIR document there are numerous instances of sentences with words missing and incomplete sentences that, in some cases, bear on the intent of the authors. A careful proof reading of the document to clarify these sentences is needed with the Final EIR (i.e. Errata).	R3. The comments are noted and no response is required. When cited, specific comments will be clarified if needed.
4. Introduction and Summary. This section indicates "this document is unique in that it includes three types of environmental impact reports (EIR) in one document: (1) Subsequent EIR, (2) Program EIR, and a Project EIR." While perhaps unique, the draft EIR falls short of adequately meeting the purposes of these three different types of EIRs in a single informational document. The document is highly selective and overly focused in its disclosure of PEP Phase 1 and 2 impacts. The EIR repeatedly references back to the 2015 FMPU Program EIR/Subsequent PEP Project EIR without providing proper context for impact findings. The organization of this EIR frustrates a clear understanding of precisely what aspects of the	R4. See Response 4.1.4.

2015 FMPU Program EIR and PEP Project EIR are changed with this Subsequent EIR. A consolidated series of tables is recommended that provide side-by-side comparisons of what specific changes are identified with respect to the FMPU Program and PEP Project Description (Phases 1, 2), Programmatic vs. Project-level Impacts, and Programmatic vs. Project-level Mitigation Measures.	
5. Thresholds of Significance. For reasons cited in its letters of April 1, 2016, to the District Board of Trustees and May 11, 2016, to Mikaela Klein, Senior Facilities Planner, the City of Walnut objects to the use of numerous imprecise and ambiguous Thresholds of Significance in the 2015 FMPU and PEP Subsequent Program/Project SEIR. As the current SEIR relies almost entirely upon the thresholds, analyses and findings of the 2015 FMPU EIR, its brief summary of impacts is similarly flawed.	R5. The comment was addressed in the Response to Comments of the 2015 FMPU/PEP EIR. The thresholds used by the District are neither "imprecise nor ambiguous" and reflect either standard CEQA professional practice or the recommendation of technical subconsultants. All Thresholds of Significance adopted in the Board of Trustees, effective May 11, 2016 were subject to public review and comment.
6. In describing this document as a Project EIR (p.2), there is reference to additional analysis included for the PEP project (Phases 1 and 2) for a geology/soils study, biological resources study, a structural assessment existing facilities at HLS, and an aesthetic evaluation. These studies are not located in the current SEIR Appendices. Please indicate where the reader can find this information.	R6. The studies referenced are in the Appendices to the 2015 FMPU/PEP Final EIR, posted on the campus website and available upon request. If any material is incorporated into the current EIR, a citation is provided.
7. Table 1.2 Summary of New or Revised Impacts. The segmentation of Impacts and Mitigation Measures between this table, the reference to lists in individual topic sections, the full 2016 Mitigation Monitoring Program (10/12/2016 in Appendix G), and the complete list of Mitigation Measures recommended for the PEP in Appendix H frustrates a clear understanding of all adopted and proposed Mitigation Measures for the PEP with this SEIR. A consolidated summary table in this section is needed that lists all applicable and proposed measures, using strikethrough and underline (or similar track changes).	R7. The mitigation measures for the PEP SEIR will be adopted when the Board certifies the document. Appendix G includes the full list of mitigation measures adopted for the 2015 FMPU/PEP. Appendix H includes all mitigation measures (i.e. previously adopted or now proposed) in a single document. The Subsequent EIR is required to identify new environmental impacts and new or revised mitigation measures, which it does. Since Table 1.2 includes only ten measures, it is readily apparent by comparing indices which measures were previously adopted in the 2015 FMPU/PEP and included in Appendix G. Please also see Sections 5.1 – 5.4 in the current EIR.
8. Land Use/Planning – The Project requires compliance with City Zoning Ordinances and without Mt. Sac's compliance with the City's entitlement process to obtain a Conditional use Permit or revisions to the City of Walnut's existing Zoning Ordinance, implementation of PEP Phase 1 and 2 would result in a significant and unavoidable conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect.	R8. The project is subject to the City's grading ordinance only. The assertion that a CUP is required is based on the false premise that the facility is not a classroom facility. See Response 4.1.7.
9. Transportation – The first impact statement is ambiguous with its reference to 'unusual' parking demand. At the least, this should be identified as a significant parking demand. With respect to MM TR-20, this should be revised to provide some assurance through a performance standard that parking demand will not exceed parking capacity. The reference to the 'Planning Plan' is unclear. As TR-20 references TR-19 (Shuttle Route system) as part of the parking mitigation, TR-19 should be included in Table 1.2.	R9. The Parking Plan reference is to the initial parking plans included in the 2015 FMPU/PEP EIR. TR-20 required a final parking plan be adopted by the Board of Trustees. TR-16 is a similar requirement and requires the parking plan be prepared within a year of the event (i.e. June 2019). TR-19 addresses informational marketing materials provided to hotel operators and are not related to parking impacts. Therefore, it is not listed in Table 1.2.
10. The second impact statement should identify off-	R10. There is no indication that the parking plan will

campus spillover parking as a possible significant impact from the lack of parking capacity.	result in spillover parking. Attendees must register and receive parking tickets during the registration period.
11. The statement 'Required Truck Hauling Plans must be reviewed by the City of Walnut', while true, is not an impact statement per se. Truck Hauling Plans must comply with local City regulations and ordinances to mitigate potentially significant impacts on City streets and neighborhoods. Please show the referenced revisions to MMs TR-28 and TR-50 in this table.	R11. The comment is noted. Until the City has reviewed a Truck Haul Plan, any conclusion regarding impact is speculative. There are no changes to TR-28 from previous CEQA documents, including the adopted Thresholds of Significance. The initial TR-50 (included in the 2016 MMP in Appendix G1) was based on the truck hauling plan and addendum rejected by the Court.
12. The fourth impact statement indicates that the PEP and 2015 FMPU/PEP will result in a less than cumulatively considerable impact to the Kellogg Drive and Interstate 10 intersection in 2020. The document does not discuss if the combined impacts of the PEP, 2015 FMPU/PEP and Olympic Trials in 2020 would result in a cumulatively considerable impact.	R12. The cumulative analysis of buildout of the PEP and hosting the Olympics is included in Table 3.17, 3.18.
13. Location and Setting .1st paragraph. 1st sentence should be corrected to indicate Mt. SAC is located south of Interstate 10.	R13. The comment is noted and hereby revised.
14. 3rd paragraph. Re: ASF and other abbreviations used in this EIR. Please include a List of Abbreviations.	R14. A comprehensive list of abbreviations used in the documents and 2016 MMP is provided in Appendix G1.
15. Table 2.1. Projects Under Construction (May 2017). With demolition of Hilmer Lodge Stadium (D4), unpermitted grading occurred without required City permits pursuant to Mitigation Measure TR-50.	R15. The grading associated with demolition was minimal and below the requirements internal to LU-07. TR-10 deals with truck hauling, not grading and has a threshold of 5,000 cy. Demolition of the stadium was based on city agreements under their health and safety abatements for vacant structures and did not require City review and approval.
16. The statement that "Projects occupied in 2020 are considered when future cumulative service demands (i.e. water, wastewater and energy demand) are projected for the campus" needs clarification. If this SEIR focuses on projects occurring between the baseline and projects occupied by December 31, 2020 (SEIR page 10), then future cumulative service demands for these projects should be evaluated in this SEIR (or addressed in an updated Program EIR).	R16. The comments appear to refer to Section 2.2 and page 21. Cumulative service demands for FMPU/PEP buildout were analyzed in the 2015 FMPU/PEP EIR.
17. Page 22, 2nd paragraph. Re: reference to Appendix K. There is no Appendix K in this SEIR.	R17. The reference to Appendix K is for the 2015 FMPU/PEP EIR.
18. 5th paragraph. Reference to 2016 Relays will be held offsite.	R18. The 2016 Relays were held at El Camino College.
19. Page 23, 2nd paragraph. Please confirm where analysis of visual impacts of these PEP facilities can be found.	R19. Aesthetic impacts of the PEP were evaluated in Section 3.7.2 (J) and 3.8.2 (J) of the 2015 FMPU/PEP EIR.
20. 4th & 5th paragraphs. References to 'PEC' project. What is this? Also, where are operational demands for energy, water and wastewater provided?	R20. The Physical Education Complex (PEC) is a reference to Phase 2 of the PEP used in some prior DSA submittals.
21. 6th paragraph. Although considered 'unlikely', a capacity stadium event and an aquatics event occurring simultaneously should be considered as a worst case scenario for traffic and parking impact analyses.	R21. The Athletics Division considers the event unlikely. The worst case scenario is hosting the 2020 Olympics. If a football and aquatics event was held simultaneously, the attendance is 9,300 (Table 2.4, which is less than the 13,000 for graduation. The 2015 FMPU/PEP evaluated a graduation event.
22. Table 2.2 PEP Statistics. Please confirm these statistics are current for April/May 2017.	R22. The statistics are current and based on DSA submittals.
23. Page 40. Re: descriptions of 2020 Olympics Track &	R23. The comments are noted. No additional response

Fields and Special Events. Though not changed from the prior 2015 Final EIR, these italicized summary descriptions are helpful for reference. It is recommended this format be replicated elsewhere in the SEIR, including the impact analyses.	is required.
24. Exhibit 2.5. Hilmer Lodge Stadium Site (2016). Please confirm if this exhibit accurately reflects April/May 2017 baseline conditions.	R24. Although taken earlier, the exhibit does reflect the baseline date. Stadium demolition began in April 2017.
25. Exhibit 2.8. Erosion Control Plan. This exhibit is unreadable in its current format. There is no apparent reference or discussion in the SEIR of drainage and erosion control measures. Also, please include the current Grading Plan for PEP Phases 1 and 2.	R25. The document recognizes that some exhibits do not read well in document formats and stated exhibits were available upon request in higher resolution files (p. 11). Both sites (Phase 1, 2) will be graded simultaneously, so the Erosion Control Plan reflects the final grading plans.
26. Table 2.5 Responsible and Interested Agencies. Identify City of Walnut as Responsible Agency for Grading and Truck Haul Plans.	R26. The comment is noted and hereby incorporated into the DEIR.
27. 3.1 Thresholds of Significance. The complete list of thresholds being used by the District should be included in this SEIR.	R27. All thresholds used by the District are either included in the Thresholds of Significance adopted by the Board of Trustees in May 2016, stated within the EIR or stated in the technical reports. The adopted thresholds are posted on the campus website.
28. 3.1.1 Existing Conditions for Physical Education Project (Phase 1, 2).	R28. The comment is noted, which is the addition of Phase 1, 2 in the title.
29. A. PEP Land Use /Planning. 3rd paragraph, last sentence. Note that future grading export will be subject to City of Walnut grading and haul requirements.	R29. The comment is noted. Mitigation Measure LU-07 addresses this issue.
30. B. PEP Traffic/Parking Existing Conditions. Page 49, last paragraph. The truck hauling plan is an area of interest for the City of Walnut. Please include an exhibit of the truck hauling plan.	R30. The route is adequately described in the EIR.
31. Reference to Supplement to an EIR is incorrect. The current SEIR is described as a Subsequent EIR.	R31. The comment is noted and hereby corrected in the Final EIR.
32. Under the heading PEP Traffic Impact, sections A, B, and C describe at length related projects for cumulative traffic impact analysis at Cal Poly Pomona and the City of Pomona. A clear summary or synthesis as to the implications for PEP traffic and cumulative traffic impacts is needed.	R32. The existing + project + cumulative analysis include the related projects in the City of Pomona and at Cal Poly. Innovation Village at Campus South is not an active project; therefore, it is not a related project.
33. Figure 2 and Table 5. Existing Plus Project Conditions (Year 2014). Please clarify to which project these refer and the utility of using year 2014 existing conditions data.	R33. The comment refers to the Cal Poly traffic analysis for Parking Structure 2. The traffic study for this EIR evaluates the same locations for 2016 as existing conditions in Table 3.11.
34. 3.1.5 (A) Cumulative Impact Analysis. 2nd paragraph. The assertion that the geographical area for analysis of other impacts (i.e. aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gases, historical resources, parking, public services, water quality, etc.) is limited to the College campus is sweeping and made without supporting evidence. The campus is surrounded by residential areas representing sensitive local receptors for air quality, noise, visual impacts on the north, west and south. Air quality impacts are regional in scope.	R34. See Response 4.1.6.
35. 3.1.6 Mitigation Measures for Traffic Cumulative Impacts. Mitigation Measure TR-60 does not indicate the	R35. As stated the California Department of Transportation District 7 is the Lead Agency. They are

status and funding mechanism for this traffic signal. If the traffic signal is not operational by 2020, the cumulative impact may be significant and unavoidable.	responsible for timing, planning and specifying funding for this intersection.
36. Page 90, 1st paragraph. Unable to locate referenced Section 3.9.	R36. The comment is noted; the proper reference is Section 4.0.
37. Pursuant to 2017 OPR adopted CEQA Environmental Checklist (Appendix G), please add 'Tribal Cultural Resources' to CEQA Environmental Checklist issues. There is no Appendix K included with this SEIR. It is unclear why the CEQA Thresholds of Significance identified in Section 4.0 deviate from the Mt. SAC CEQA Thresholds of Significance adopted via Resolution No. 15-09. To provide adequate support for the Checklist responses in this section, please provide a list of sources of information following each of the Environmental Findings. For responses that rely upon the 2015 FMPU/PEP Final EIR provide section/page reference.	R37. The District's Thresholds of Significance do not cover all issues included in the CEQA Checklist. The analysis within Section 4.0 is based on the Checklist. Section 5 (e) on page 92 addresses tribal issues. The information included in the SEIR and its technical studies are the sources used in the analysis. All sources are also included in the Bibliography in Section 11.0.
38. Page 92. Air Quality. Please include threshold criteria a, b and c and Finding of Effect for each.	R38. Section 4.0 discusses only those Checklist issues when the project has no impact. The other items (e.g. a, b, c) are discussed in the topical sections of the EIR.
39. Page 92. Biological Resources. Please include threshold criteria a, b and d and Finding of Effect for each.	R39. Section 4.0 discusses only those Checklist issues when the project has no impact. The other items (e.g. a, b, d) are discussed in the topical sections of the EIR.
40. Page 93. Cultural Resources. The cultural resources section of the 2017 EIR (page 93) contains two new cultural resources CEQA checklist items that were not included in the 2015 FMPU EIR. Item d is the checklist item about disturbance of human remains and Item e is the new checklist item about Tribal Cultural Resources (AB 52). The response to Item d says that the PEP site has been graded in the past and there is no potential for human remains. The response for Tribal Cultural Resources (Item e) states that the PEP site has no established cultural tribal value. It is then stated that the PEP has No Impact on Items 5 (d, e). This is true for Item d (human remains), but is unknown for Item e (Tribal Cultural Resources). The statement that the PEP site has no established cultural tribal value is apparently based on Native American consultation conducted in 2014 and reported in the 2015 FMPU EIR. However, to properly address Item e, there must be evidence of compliance with AB 52, a formal consultation process requiring notification to Native American tribes who have requested consultation under AB 52. The purpose of the AB 52 consultation process is to identify Tribal Cultural Resources that could be impacted by the project. AB 52 consultation is required for all CEQA documents for which a notice of preparation (NOP) is filed for an ND, MND, or an EIR after July 1, 2015. Since the NOP for the 2017 EIR was filed in April 2017 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. It is possible that no tribes requested consultation under AB 52, but if this is the case, this must be stated in the EIR.	R40. The individual items for the cultural resource sections were changed by the Resources Agency and OPR. See Response 4.1.8 for AB 52 tribal consultation activities for the project.
41. Page 93. Geology and Soils. Please include threshold criteria a ii) and its Finding of Effect.	R41. Section 4.0 discusses only those Checklist issues when the project has no impact. Item a (ii) is discussed in the topical sections of the EIR. Each agency gets to choose the format and organization for its documents; they are not dictated by outside agencies.
42. Page 94. Greenhouse Gas Emissions. Please	R42. Section 4.0 discusses only those Checklist issues

include threshold criteria a) and its Finding of Effect.	when the project has no impact. Item a is discussed in the topical sections of the EIR.
43. Page 95. Hydrology and Water Quality. Please include threshold criteria a, b and c and Finding of Effect for each.	R43. Section 4.0 discusses only those Checklist issues when the project has no impact. Item a is discussed in the topical sections of the EIR.
44. Page 95. Land Use and Planning. Please include threshold criteria b) and its Finding of Effect. Note that Land Use and Planning remains an unavoidable adverse impact, as indicated in Section 8.0.	R44. Section 4.0 discusses only those Checklist issues when the project has no impact. Item b is discussed in the topical sections of the EIR.
*45. Page **96.** Noise. Please include threshold criteria a) and c), and Finding of Effect for each.*	R45. Section 4.0 discusses only those Checklist issues when the project has no impact. Item a is discussed in the topical sections of the EIR.
46. Page 97. Public Services. Please address effects on municipal police, fire and off-campus parks created by attendees to the OTFT and Specials Events.	R46. Section 4.0 discusses only those Checklist issues when the project has no impact. See the discussion of public services in Sections 3.7.2 and 3.8.2 of the 2015 FMPU/PEP EIR.
47. Page 97. Recreation. See comment re: parks under Public Services.	R47. Section 4.0 discusses only those Checklist issues when the project has no impact
*48. Page **98.** Transportation and Traffic. Please include threshold criteria a) and d), and Finding of Effect for each.*	R48. Section 4.0 discusses only those Checklist issues when the project has no impact. Item a is discussed in the topical sections of the EIR.
49. Page 98. Utilities and Service Systems. Please identify the PEP Buildout Year corresponding to PEP serviceability findings and sources of information address ability to serve OTFT and Special Events peaks for water and wastewater.	R49. See Response 4.1.3. The 2015 FMPU/PEP EIR projected that Phase 1 will be completed by August 2018 and Phase 2 by August 2020.
50. Mandatory Findings of Significance. Please include CEQA Checklist criteria b) regarding cumulatively considerable impacts and provide its Finding of Effect.	R50. R48. Section 4.0 discusses only those Checklist issues when the project has no impact. Item b is discussed in the topical sections of the EIR.
51. Page 100, 1st paragraph. Unable to locate Section 3.10 referenced here.	R51. The proper reference is Section 5.1 – 5.3 and is hereby added to the Final EIR.
52. Page 101. Mitigation Measure TR-28. This programmatic measure should also include a requirement for a parking monitoring program with assurances of adequate parking supply to meet demand with buildout of individual projects and campus events.	R52. TR-28. The assessment of parking demand with each individual project is not required or practical. Each facility plan established parking demand for buildout and TR-28 provides assurances parking demand based on current enrollment data and parking supply remain sufficient when a facility plan is not being prepared.
53. Page 103. Revised District Threshold of Significance. Re: Haul Routes. It is recommended this be revised as follows: Haul Routes – Does the project result in export of 5,000 cy or more on any public roadway? The mitigation for this potentially significant impact is provided with Mitigation Measure TR-50, as specified in Table 1.2 and Appendix H.	R53. The comment is noted. The District prefers to separate thresholds and mitigation measures. The City of Walnut cannot dictate policies or regulations in other cities.
54. Page 105. In Unavoidable Adverse Impacts on page 105, it says that Hilmer Lodge Stadium, the Gymnasium, and Buildings 27A – 27C are potentially eligible as historic resources in the California Register of Historic Resources. This should be revised to say Hilmer Lodge Stadium, the Gymnasium, and Buildings 27A – 27C are eligible as historical resources in the California Register of Historical Resources. The buildings were determined eligible when the 2015 FMPU EIR was certified (no longer potentially eligible; they would now be eligible but for the fact that HLS has recently been demolished). Also, historic	R54. The language is appropriate because eligibility is not confirmed unless an application is approved by SHPO.

resources should be changed to historical resources	
55. The interspersing of numbered impact statements with background explanations is confusing. Please list all the unavoidable adverse impacts (1-6) in sequence, followed by any necessary explanations of what has been added and deleted.	R55. The comment is noted. Each lead agency may choose what organization of material it deems appropriate.
*56. The SEIR evaluates three alternatives: No Project **(35,986** fall enrollment headcount), Alternative 1: Revise Physical Education Project, and Alternative 2: No 2020 Olympic Track and Field Trials. The Stadium has been recently demolished. This means that two of the three alternatives (No Project and Alternative 1) are no longer feasible alternatives. Moreover, in its June 29, 2017 edition the LA Times notes that it has been officially announced that Mt. SAC will host the 2020 Olympic track trials. In effect, this decision removes Alternative 2 as a feasible alternative. Therefore, the FEIR does not consider any feasible alternatives, including potentially Environmentally Superior Alternatives and the No Project Alternative, as required by CEQA. A viable alternative that reduces impacts on surrounding roadways and land use is needed, as well as a No Project Alternative that reflects continuation of current conditions (e.g., no stadium on the campus).*	R56. Approval of an application to host the 2020 Olympic Trials is a preliminary hurdle and does not assure the District will host the event. Alternative 2 remains a feasible alternative, as does no further development on the stadium site. While the no-project alternative is recommended for rejection because it does not meet the District's objectives, it remains a valid alternative in the DEIR for preliminary discussion. The District has wide discretion to select what alternatives it analyzes in an EIR. The comment does not specify what the "additional viable alternative" is. The EIR includes a reasonable range of alternatives for comparison. Since the no-project alternative results in an enrollment reduction of 9.4 percent compared to 2020 enrollment, and enrollment determines traffic levels, the no-project alternative results in the objectives desired in the comment's "viable alternative."
57. A list of the Project Objectives for the PEP is needed for the analysis of each alternative in this section. As a complete list of Project Objective for the PEP is not included in the SEIR, it is unclear from the discussion whether these alternatives 'would feasibly attain most of the basic objectives of the project' (CEQA Guidelines 15126.6). The analysis in these sections should also specifically address whether the alternatives 'would avoid or substantially lessen' (15126.6) each of the six (6) impacts identified as unavoidable adverse in Section 7.0. The unavoidable adverse impact associated with Land Use and Planning should be discussed under each alternative.	R57. See Response 4.1.1. The topical discussion within each alternative section addresses how the alternative relates to adverse impacts.
58. Historic Resources. The No Project should discuss the existing conditions at the time the notice of preparation is published [15126.6 (2)]. Grading activity has already occurred within the PEP. The discussion of No Project and Alternative 1 should describe the timing and extent of grading and demolition that has already occurred, and the impact, such activity has had on the Historic District and historic Hilmer Lodge Stadium.	See Response 4.1.1. Demolition of the stadium was based on city agreements under health and safety abatements for vacant structures. The District is implementing the mitigation measures adopted for historic resources related to the stadium (i.e. CR-01 to CR-10). Grading of the PEP site was authorized by the 2012 and 2015 Final EIRs. See Table 3.8.4 in the 2015 EIR. The initial grading on the stadium hill occurred in June – September 2014. Both preliminary and final grading will occur in conjunction with future development. The preliminary grading will export 139,000 cubic yards to the West Parcel and the final grading will conform to the Erosion Control Plan (Exhibit 2.8).
59. Table 7.1 Project Alternatives Comparisons. This table identifies Alternative 1-Revise Physical Education Project 2020 as the Environmentally Superior Alternative. [15126.6(2)]. Yet, the Preferred Alternatives (page 116) indicates Alternative 1 is not the 'superior' alternative. Please explain this apparent discrepancy. There is no prior discussion of the California Black Walnut Management Plan (CBWMP) and Land Use Management Area (LUMA) in Section 7.0 or elsewhere in the SEIR to support the assertion that the benefits of these make Alternative 2 the environmentally superior alternative. Moreover, there is no explanation why the CBWMP and LUMA cannot be implemented with Alternative 1.	R59. Table 7.1 provides a relative ranking of the alternatives based on environmental issues only. The discussion on page 116 includes multiple factors, including environmental, educational objectives etc. The no-project alternative is the environmentally superior alternative but the paragraph is hereby revised as follows: If the environmentally superior alternative is the no-project alternative, Section 15126.6 (2) of the CEQA Guidelines requires another project alternative be identified as environmentally superior among the remaining alternatives. However, the no-project alternative is not the designated "superior" alternative.

	While the no-project alternative does not demolish Hilmer Lodge Stadium, a potential contributor to the historic district, the benefits of implementing the California Black Walnut Management Plan (CBW) and the implementation of the Land Use Management Area would not occur. The no-project alternative also does not meet the educational objectives and facility needs of the District. Since Alternative 2 has less historic impacts than the project, implements the CBW and LUMA plans and meets some but not all of the educational objectives of the District, Alternative 2 is the environmentally superior alternative. Alternative 2 does not include hosting the 2020 Olympic Track & Field Trials. The California Black Walnut Plan is referenced in the bibliography and included in Appendix E of the 2012 Facility Master Plan Draft EIR. Copies are available upon request. The Land Use Management Area is identified in Campus Zoning (Exhibit 1.4)
60. Appendices A through H need to include tabs to identify and separate each Appendix.	R60. The comment is noted. The appendices are included as individual files in the Appendices, which provides the separation requested in the comment.
*61. Appendix **A** – Notice of Preparation and Responses. The NOP dated April 14, 2017, establishes an environmental baseline for evaluation of impacts in this SEIR. The Thresholds of Significance identified in the Initial Study Checklist are appropriate for use in the SEIR.*	R61. No comment is provided.
62. Appendix H – Draft 2017 Mitigation Monitoring Plan. This provides a list of mitigation measures only. Assurances of the ability to implement and enforce these measures are needed. Information needs to be added to each of the remaining columns, including Other Agencies/Firm Involved, Timing, Date Completed, and Responsible Party/Signature.	R62. Information is added to the form when the mitigation measure is being implemented. If outside agencies are involved, they are identified in the mitigation measure. Staff do not "sign-off" on implementation until the measure has been completed.
63. The NOC does not fully comply with content requirements of CEQA 15085. The project description is exceedingly brief and unsupported by any tables or exhibits. The NOC merely indicates the "the project remains unchanged." The NOC fails to include either of the methods prescribed in 15085 for identifying the location of the project (i.e. specific map, street address and cross streets) and refers the reader to the District's website. The date under Project Title and Applicant is incorrectly shown as May 19, 2016.	R63. As required, a brief project description, street address, reviews period, and where the Draft EIR is available is included. Therefore, it complies with the statue.
Comments are cited from ECORP CEQA Comments on the Draft Subsequent EIR for Mt. SAC PEP (Phase 1, 2) – Attachment A	

As stated previously, the focus of review of a Draft EIR (Section 15204 of the CEQA Guidelines) is on the sufficiency of the document in identifying and analyzing project impacts and how to reduce or avoid them. A Subsequent EIR (Section 15162 of the CEQA Guidelines) focuses on any new significant effects not previously identified in the prior EIR and new feasible project alternatives or mitigation measures that would substantially reduce one or more significant effects. Lead agencies need only respond to significant environmental issues identified in project review and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (Section 15203 (a)).

The focus of review is germane to the attachments since consultants have chosen to comment again on technical studies included in the 2015 FMP/PEP Final EIR certified in October 2016. Comments on previous studies are appropriate only if new significant environmental issues are identified or the

comments are on material in the current EIR that is considered less than sufficient. When comments do not meet this criteria the District may respond to comments but is not obligated to do so.

Kunzman Associates has now submitted eighteen (18) comments dated June 28, 2017 on the 2015 FMPU/PEP Draft EIR traffic study dated July 9, 2016. The firm previously submitted thirty-five (35) comments on July 19, 2016 and August 22, 2016 on the July 9, 2016 study. Therefore, their comments are the third time they have commented on the same traffic study.

Iteris Inc (traffic engineers for the District) responded to all prior comments (i.e. July 19 and August 22, 2016) submitted by Kunzman Associates, and an updated traffic study and appendices were completed by Iteris on September 1, 2016. The City of Walnut received the response to comments document ten days prior to the public hearing and the Final EIR was certified on October 12, 2016. All reports cited are posted on the District's website.

An EIR should be prepared with a sufficient degree of analysis to provide the Board of Trustees with information which enables them to make a decision which intelligently takes account of environmental consequences. However, the evaluation of the environmental effects of the proposed project need not be exhaustive. The sufficiency of an EIR is reviewed in light of what is reasonably feasible.

Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. When required, the District has provided this information in the responses (CEQA Guidelines, Section 15151).

Comments 4.1.12: Comments included in Attachment B: Traffic Review (Kunzman Associates) for the City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

Iteris Inc. has provided direct responses to all relevant comments in the June 28, 2017 correspondence to Ms. Anne Surdizial, ECORP Consulting, Inc. Iteris developed its own comment and response index therein.

iteris

July 21, 2017

Ms. Rebecca Mitchell
Mt. San Antonio College
Facilities Planning and Management
1100 North Grand Avenue
Walnut, CA 91789

RE: Responses to Comments in Attachment B: Traffic Review (Kunzman Associates) from the City of Walnut, July 3, 2017

Dear Ms. Mitchell:

I have reviewed the comments provided by Kunzman Associates in Attachment B of the City of Walnut letter dated July 3, 2017. The responses are provided in the following table.

City of Walnut (Kunzman letter)		
Comment		**Response**
6-8.1	Page 3. Revise Grand Avenue to have posted speed limits ranging from 40 to 50 miles per hour.	Comment is noted, but is not relevant to LOS and significant impact analysis. The posted speed limit does not impact the level of service, which is dependent on trips and signalization timing.
6-8.2	Page 3. Revise Amar Road/Temple Avenue to have a posted speed limit of 40 miles per hour.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.3	Page 3. Revise to "Lemon Avenue, oriented in a north-south direction, is a two-lane undivided to fourlane divided roadway…".	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.4	Page 3. Revise Lemon Avenue to have posted speed limits ranging from 25 to 35 miles per hour.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.5	Page 3. Revise to "Cameron Avenue terminates at Grand Avenue on the east end".	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.6	Page 4. Revise to state that Valley Boulevard allows on-street parking south of Temple Avenue.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.7	Page 5. Intersection #6, change Montaineer to Mountaineer throughout report.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.8	Page 10. Table 4 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.9	Page 11. Figure 3 should show existing right turn overlap and free right turn lanes at the study area intersections.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.10	Page 11. Intersection #1 (Nogales Street & Amar Road) appears to provide sufficient width for a westbound right turn lane (defacto = minimum of 19 feet in width). Please correct in Level of Service calculations.	Comment is noted. The recommended adjustment would either improve or have no effect on the intersection LOS, thus the traffic study presents a conservative analysis.
6-8.11	Page 11. Intersection #2 (Lemon Avenue & Amar Road) appears to not provide sufficient width for4 a westbound right turn lane (defacto = minimum of 19 feet in width). Please correct in Level of Service calculations.	Based on evaluation in Google Earth, the #2 westbound through lane is measured to be between 19 and 20 feet, which should provide adequate width for a de-facto right-turn lane.
6-8.12	Page 11. Intersection #11 (Grand Avenue & Baker Parkway) currently provides a southbound free right turn lane. Please correct in Level of Service calculations.	Comment noted. The recommended adjustment would either improve or have no effect on the intersection LOS, thus the traffic study presents a conservative analysis.
6-8.13	Page 11. Intersection #13 (Grand Avenue & SR-60 EB Ramps) currently provides a 3rd southbound through lane. Please correct in Level of Service calculations.	The analysis and EIR reflects the configurations of the intersections at the time that the traffic study was prepared (2015). The recommended adjustment would either improve or have no effect on the intersection LOS, thus the traffic study presents a conservative analysis.

6-8.14	Page 11. Intersection #16 (Lot F & Temple Avenue) does not provide southbound lanes. Please correct in Level of Service calculations.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.15	Page 12. Typically, trip generation for junior/community colleges is based upon student full time equivalents. Please confirm or explain.	Comment is noted. ITE specifies the trip rate for students, not the method by which students are projected. ITE rates are based on surveys of sites that have both full-time and part-time students. Assuming all new students as full-time enrollment is a worst-case projection of trips and parking demand for any given weekday when campus is full session.
6-8.16	Page 15. Figure 4 assigns 24% of the project trip distribution to Grand Avenue south of Temple Avenue. However, the remaining project trip distribution south of Temple Avenue only adds to 20%. Explain.	Comment is noted. While some smaller trip percentages are not directly shown on the figure, 24% of the project trip distribution is destined for or originates from south of Temple Avenue.
6-8.17	Page 18. An areawide growth rate obtained from the latest Congestion Management Program for Los Angeles County should be included for Year 2020 traffic conditions.	Comment is noted. An areawide growth rate was not used for this analysis, as a 2020 No Project baseline scenario was not the intent of this section. Rather, an E+ P scenario that compares the project's trip generation impact in 2020 to Existing conditions is the purpose of this section
6-8.18	Page 20. Table 7 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.19	Page 23. Table 8 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.20	Page 24. An areawide growth rate obtained from the latest Congestion Management Program for Los Angeles County should be included for Year 2025 traffic conditions.	Comment is noted. An areawide growth rate was not used for this analysis, as a 2025 No Project baseline scenario was not the intent of this section. Rather, an E+ P scenario that compares the project's trip generation impact in 2020 to Existing conditions is the purpose of this section.
6-8.21	Page 26. Table 9 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.22	Page 29. Table 10 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.23	Page 29. Table 10 shows that Grand Avenue/Temple Avenue intersection has a significant impact with mitigation. Explain.	At this intersection, no feasible mitigation measure was recommended. Thus, the intersection remains significantly impacted. As stated in the first sentence on Page 30, project impacts are reduced to less than significant only at locations where improvements were considered feasible.
6-8.24	Page 30. Confirm that Table 11 includes the following cumulative development projects that are under construction/built since 2015 traffic counts were taken: - New Innovation Village Project, City of Pomona1 - Tentative Tract Map No. 50867, City of Walnut2 - 20650 San Jose Hills Road Project, City of Walnut3	Cumulative project lists were provided by each individual jurisdiction when the traffic study was prepared in April 2016. The New Innovation Village is no longer an active project.
6-8.25	Page 32. Table 11 footnote should include sf = square feet.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.26	Page 40. Table 14 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.

6-8.27	Page 44. Table 15 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.28	Page 44. Table 15 shows that Grand Avenue/Temple Avenue intersection has a significant impact with mitigation. Explain.	At this intersection, no feasible mitigation measure was recommended. Thus, the intersection remains significantly impacted. As stated in the first sentence on Page 45, project impacts are reduced to less than significant only at locations where improvements were considered feasible
6-8.29	Page 49. Table 16 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.30	Page 52. Table 17 footnote should include ICU = Intersection Capacity Utilization.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.31	Page 52. Table 17 shows that Grand Avenue/Temple Avenue intersection has a significant impact with mitigation. Explain.	At this intersection, no feasible mitigation measure was recommended. Thus, the intersection remains significantly impacted. As stated in the first sentence on Page 53, project impacts are reduced to less than significant only at locations where improvements were considered feasible.
6-8.32	Page 54. 1st paragraph should reference the latest Congestion Management Program for Los Angeles County.	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.33	Page 54. Section 13 should include a discussion of current improvements being constructed at the following interchanges: - Grand Avenue at I-10 Freeway - Grand Avenue at SR-60 Freeway	Comment is noted, but is not relevant to LOS and significant impact analysis.
6-8.34	Appendix B. Intersection # 10 (Grand Avenue & Valley Boulevard) traffic volumes are different from traffic count worksheets. Explain.	After further review, the Existing Conditions LOS output sheets "Base Vol" row volumes correctly match the traffic count sheets for the am & pm peak hours. In the pm peak hour, the U-turn volumes from the traffic count sheets are considered as part of the left-turn movement in the LOS output sheets.
6-8.35	General. A queuing analysis should be performed to confirm that adequate left turn storage will be provided at the study area intersections for future traffic conditions.	The traffic study conforms to the Los Angeles County traffic impact review guidelines. A queuing analysis is not considered a requirement of these guidelines.
6-8.36	General. See Comments 15, 17, 20, and 24 above.	Comment noted.
6-8.37	Page 22. The Olympic Track and Field Trails Traffic section should be analyzed at the intersections included within the September 1, 2016 Traffic Impact Study.	An Olympic Track and Field Trials (OTFT) analysis was prepared for these intersections in the 2015 FMPU/PEP Draft EIR.
6-8.38	General. A Traffic Management Plan (TMP) and Parking Management Plan (PMP) should be provided for major events.	Comment noted. Preparation of a TMP and PMP are not considered relevant to LOS and significant impact analysis. See Mitigation Measures TR-16, 20, 25 in Appendix H1.

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

Sincerely,

Iteris, Inc. ,

Deepak Kaushik
SeniorTransportation Engineer

Comments 4.1.13: Comments included in Attachment C: Noise Review (Kunzman Associates) for the City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

Greve & Associates has provided direct responses to all relevant comments in the June 26, 2017 correspondence to Ms. Anne Surdizial, ECORP Consulting, Inc. Greve & Associates developed its own comment and response index therein.

Memorandum

Date: July 13, 2017

To: Rebecca Mitchell, MtSAC
Sean Absher
Sid Lindmark, AICP

From: Fred Greve, Greve & Associates, LLC

Subject: Response to Noise Comments

Please find responses to noise comments submitted by the City of Walnut. These are the comments found in Attachment C of the comment letter.

DRAFT SEIR COMMENTS

COMMENT 1
The noise study published on the mtsac.edu website (Report #16-008NZ May 26, 2016) is different than the noise study listed in the bibliography of the most recent Draft SEIR (Report #16-002NZ April 15, 2016). Also, the bibliography lists a traffic study update, but there was no noise study update to reflect this new information.

Response 1
Mt. SAC staff occasionally completes minor edits in sub-consultants reports prior to posting the final report on the campus website and changing the date. There are no significant changes between the two 2015 FMPU/PEP noise reports. Appendix D1 of the Draft EIR included an earlier report.

Since there are no sensitive noise receptors close to the Campus/Temple and Kellogg Drive/I-10 interchange, no new noise study was required. The noise studies in the certified 2015 FMPU/PEP Final EIR remain relevant for the PEP (Phase 1, 2) project. The enrollment projections have not changed, which determine trips on the area circulation network.

COMMENT 2
The Draft SEIR fails to acknowledge construction noise impacts. Furthermore, the Draft SEIR improperly pushes aside any construction noise findings that are outlined within the technical noise study. Table 3.7of the Draft SEIR says that the FMPU noise impact is less than significant with mitigation. However, the noise study clearly states on pages 44/45 that there are projects with the potential to create a significant construction noise impact; and, therefore the noise impacts associated with these projects must still be considered to be significant (see last paragraph of Section 3.1.1 of the noise study).

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

Response 2

The comments do not reflect the context in which they are written in the noise report. The projects being discussed on pp. 44 - 45 in Appendix D1 (noise study) do not occur until after 2020 (Appendix K1). The mitigation measure described on p. 44 is applicable in the future when more detailed plans for the projects are available. Therefore, the current CEQA documentation does not provide CEQA clearances for these projects and additional documentation will be completed when project-specific plans are available.

Table 3.7 in the 2017 EIR is an accurate duplicate of Table 3.8.23 and Table 3.11.11 in the 2015 FMPU/PEP DEIR. No further response is required.

TECHNICAL NOISE ANALYSIS COMMENTS

COMMENT 3

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

Response 3

Ambient measurements were taken on August 17, 2015, and each site was measured for 15 minutes. The report is attached. Stadium noise measurements around Hilmer Lodge Stadium were made October 24, 2015. Two 15-minute measurements were made at each site. The report is attached.

COMMENT 4

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

Response 4

The vehicle mix and time distribution is provided below. For this analysis it was assumed that the roadway was straight and level. With this data the commenter should be able to confirm the noise outputs if desired.

The traffic distributions that were used in the CNEL calculations are presented below. The arterial traffic distribution estimate used for the roadways was compiled by the Orange County Environmental Management Agency, and is based on traffic counts at 31 intersections throughout the Orange County area. Arterial traffic distribution estimates can be considered typical for arterials in Southern California.

Traffic Distribution by Time of Day

	Percent of ADT		
Vehicle Type	Day	Evening	Night
Automobile	75.51%	12.57%	9.34%
Medium Truck	1.56%	0.09%	0.19%
Heavy Truck	0.64%	0.02%	0.08%

COMMENT 5

Page 20, Thresholds of Significance: Threshold 2 states:

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

Program as 7 a.m. to 7 p.m. on Monday through Saturday." Each time that the Threshold says "less", likely "more" was meant. This typo needs to be revised and the thresholds need to be updated.

Response 5

The commentator is correct. The corrected language without typos should read:

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

It should be noted that the analysis already is based on the correct language, and therefore, no changes to the analysis or determination of impacts needs to be made.

COMMENT 6

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

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

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

Response 6

The use of the word "and" between the three stipulations makes it clear that all conditions must be met for an impact to occur. Stipulation #1 is needed to cover a Sunday situation. No change to the significance threshold is needed other than those identified in Response 5.

COMMENT 7

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

Response 7

The comment is incorrect. If the noise increase is less than or equal to 3 dB, then no noise impact will occur. Only if a noise increase greater than 3 dB occurs and the noise level exceeds 65 CNEL for residences and hospitals or 70 CNEL for commercial areas does an impact occur. As shown in Table 5 of the noise report there were no increases greater than 3 dB, therefore, no additional analysis was needed.

COMMENT 8

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

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

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

For areas where construction would occur closer to sensitive receptors there is no quantitative evaluation. At no point does the assessment evaluate the combined noise level of multiple pieces of construction equipment operating simultaneously. Instead, the technical noise study describes that there would be a significant impact and further evaluation would be required when more information is available. Although a list of construction equipment may not be readily available at this time, the technical noise study could utilize the construction equipment within the air quality study and utilize either the FHWA's construction noise model or the FTA's construction noise methodologies to calculate the potential impact.

Response 8

The range of noise that is being quoted in the report is for equipment that will likely be used for construction. The "105 dBA" figure quoted in the comment is for pile driving which is not planned for use (refer to Section 2.2.2). The comment that Lmax and Leq are "very similar" at distances 50 feet is wrong. Leq is an average noise level while Lmax is the maximum noise level. The noise level would have to be constant at the Lmax level for the Leq to be equal to the Leq irregardless of distance.

The methodology used for the calculations is straightforward. The noise levels are presented in the text, an exhibit is presented showing the location of the residents to the various projects, and a standard 6 dB per doubling of the distance was used for the drop-off rate. No adjustments were made for intervening buildings or topography unless noted. The comment is not correct; the analysis clearly shows that most of the construction would occur at distances less than 1,500 feet. Of the 26 projects listed in Table 4, all but 2 are listed as being closer than 1,500 feet. This is also shown in Exhibit 9.

The equipment used for critical projects is not known at this time, and 6 projects were identified as needing additional analysis with a corresponding mitigation measure (see Section 3.1.1). The equipment list in the air quality analysis may not be suitable for the noise analysis since the two assessments have vastly different purposes.

COMMENT 9

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

Response 9

The noise levels in Exhibit 8 and the FTA study are maximum sound levels (Lmax). Our comment in the report that Leq noise levels are typically 15 dB less than Leq noise levels is based on our general observations/measurements of construction noise. This may not line up exactly with the "typical" Lmax levels shown in Exhibit 8 but it is generally consistent with the levels indicated in Exhibit 8.

COMMENT 10

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

Response 10

The Lmax levels are due to one piece of equipment. The Lmax levels of 2 and more pieces of equipment rarely occur at the same exact time and rarely add together in the field. The FTA methodology is good, but does have flaws, and it is not required for this analysis.

COMMENT 11

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

Response 11

The distance to the closest residence was used for the analysis. This location is not at Site 6 or at Site 7. However, it is on the same street as Site 7, and Site 7 was chosen for comparison with ambient noise levels because our opinion is that it is more representative of the residence assessed.

COMMENT 12

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

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

Response 12

The three stadium measurement reports are attached to these responses. A spreadsheet is also attached which shows the stadium calculation noise. Basically the Hilmer Lodge Stadium noise measurements were normalized as best as possible. Event noise was then adjusted based on crowd size. The noise levels presented in Table 10 are peak noise levels, and comparing them to the Leq criteria is inappropriate. They should be compared against the Lmax criteria which is clearly identified.

COMMENT 13

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

Response 13

Parking lots do not generate significant noise levels based on the CNEL noise scale for several reasons. The traffic volumes are low compared to arterial roadways which do generate significant CNEL noise levels. Additionally, the speeds in parking lots are very slow which leads to low noise generation. And finally, the lots at MtSAC have essentially no nighttime traffic which leads to low CNEL noise levels.

COMMENT 14

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

Response 14

Parking lot noise measurements were made by Mestre Greve Associates at a distance of 50 feet. The noise levels were then extrapolated using a 6 dB per doubling distance to obtain the noise levels presented in Table 11. Table 1 is not sourced for the noise levels in Table 11. Site 1 in Table 1 was only referred to for ambient noise levels.

COMMENT 15

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

Response 15

See Response 12. The Lmax noise level of 68.8 dBA was not caused by crowd, PA system, or any other event associated with the football game.

Comments 4.1.14: Comments included in Attachment D: Air Quality/GHG Review (Kunzman Associates) for the City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

Greve & Associates has provided direct responses to all relevant comments in the June 28, 2017 correspondence to Ms. Anne Surdizial, ECORP Consulting, Inc. Greve & Associates developed its own comment and response index therein.

G&A

Memorandum

Date: July 17, 2017

To: Rebecca Mitchell, MtSAC
Sean Absher

Sid Lindmark, Lindmark and Associates

From: Fred Greve, Greve & Associates, LLC

Subject: Response to Air Quality and GHG Comments

Please find responses to air quality and climate change comments submitted by the City of Walnut. These are the comments found in Attachment D of the comment letter.

AQR and AQ-RELATED DRAFT SEIR COMMENTS

GLOBAL COMMENT

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

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

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

Global Response

Comment noted.

COMMENT 1

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

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

Response 1

Mt. SAC staff occasionally completes minor edits in sub-consultants reports prior to posting the final report on the campus website. Both the posted reports for the 2015 FMPU/PEP and the reports listed in the Bibliography on page 128 for the PEP Update are dated April 15, 2016. No discrepancy is noted between the reports.

Since there are no sensitive noise receptors close to the Campus/Temple and Kellogg Drive/I-10 interchange, no new noise study was required. The noise studies in the certified 2015 FMPU/PEP Final EIR remain relevant for the PEP (Phase 1, 2) project. The enrollment projections have not changed, which determine trips on the area circulation network.

The September 2016 traffic study update deals primarily with the new impacts of buildout of the 2015 FMPU/PEP on the two intersections in the City of Pomona (Campus Drive/Temple and Kellogg Drive/I-10). The PEP Update EIR also includes analysis of the 2020 Olympic Track & Field trials at these two intersections. While the results of the initial traffic study are cited in the current report, there is no need to update the traffic analysis for other intersection. Therefore, the initial air quality and noise studies do not need to be updated (i.e. enrollment and trips have not changed).

This EIR addresses the PEP (Phase 1, 2) project. The air quality and GHG reports for the West Parcel Solar project will be posted when the WPS Draft EIR is posted.

COMMENT 2

According to the CalEEMod output in the appendices, the AQR analyzed existing emissions from a 35,986 student junior college on 420 acres. Those daily criteria pollutant emissions were reported in Table 3 on page 10 of the AQR, and also Table 3.3.4 on page 149 of the Draft SEIR. The CalEEMod output (all winter outputs, no summer emissions provided) of the AQR also showed that analysis was performed for the following:

1. *FMPU Buildout including demolition and excluding PEP. This analysis was done for 259.02 TSF of junior college land use on 5.95 acres, operational in 2025, with construction from 1/1/2017 to 3/23/2018.*
2. *FMPU - Building G construction and demolition. This analysis was done for 50 TSF of junior college land use on 5 acres, operational in 2021, with construction from 1/1/2019 to 2/24/2020.*
3. *FMPU - Building A construction (No demolition). This analysis was done for 50 TSF on 1.15 acres, operational in 2025, with construction from 1/1/2025 to 12/11/2025 (construction output includes demolition, even though it should not [according to the title]).*
4. *FMPU - 2020. This analysis is for a 39,731 student junior college land use (1,734,347.04 of floor surface area) on 39.82 acres. Operational in 2020. No construction emissions report is included with this output, so it is assumed that this CalEEMod run represents operational emissions only.*
5. *FMPU - 2025. This analysis is for a 46,139 student junior college land use (1,883,113.86 of floor surface area) on 43.23 acres. Operational in 2025. Again no construction emissions report, so it is assumed that this CalEEMod run represents operational emissions only.*
6. *PEP - Phase 1 - Construction Only. This analysis is for a 91.73 TSF junior college land use on 2.11 acres, general light industry of 79.40 TSF on 1.82 acres, 174.43 TSF of other non-asphalt surfaces on 4 acres, 107.57 TSF of parking lot land uses on 2.47 acres, and 21.80 acres of city park land uses, operational in 2019, with construction from 10-3-2016 to 8-16-2018. 7. PEP - Phase 2 - Construction Only. This analysis is for a 117.90 TSF junior college land use on 2.71 acres, enclosed parking structure (to simulate pool area) of 23.09 TSF on 0.53 acres, and 68.81 TSF of other non-asphalt surfaces (to simulated tennis courts) on 1.58 acres, operational in 2021, with construction from 2/1/18 to 9/28/2020.*

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

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

Response 2

The winter CalEEMod and summer CalEEMod are nearly identical, and it didn't seem necessary to include the summer runs.

Any confusion regarding individual or total building square footages in the Draft EIR is related to these factors: (1) The initial analysis is based on information available when the NOP was issued, (2) CalEEMOD may generate emissions based on either land use or square footages. In some cases, land use acreage was used and the total square footage is derived internally by CalEEMod, and (3) The square footages projected for buildout of the 2015 FMPU/PEP in 2020 and 2025, along with demolition estimates, was included in Appendix K1 of the 2015 FMPU/PEP Draft EIR.

The prior air quality and greenhouse gas analysis remains adequate for the changed project, and the changed project does not alter the enrollment or square footage assumptions used in the 2015 FMPU/PEP EIR. The analysis of two new intersections has no bearing on the prior conclusions for buildout of the 2015 FMPU/PEP, PEP (Phase 1, 2) or other large individual projects analyzed.

COMMENT 3

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

a) *On page 15 of the AQR under the subheading 2.2.1.3 Construction Emissions for Building A, it states there that Building A will be 167,200 gsf by 2025. Whereas the CalEEMod output shows that the analysis of Building A (No Demolition) is for a 50.00 TSF junior college on 1.15 acres; therefore, emissions for Building A are under-reported and the emissions need to be revised and re-analyzed for inclusion in Tables 8 and 9 of the AQR. Furthermore, according to the output header and the text on page 15, "Demolition will be required to clear the site for Building A, but this was assumed to occur during the construction of Building G." However, demolition was analyzed for this part of the project, and the demolition emissions were reported under the Demolition Activity in Table 8 on page 16 and Table 9 for the LST analysis on page 17 of the AQR. It is unknown how many SF of existing buildings (16, 18, 18, 19 and 21) were analyzed as being demo'd, as there are no details in the report or CalEEMod output regarding what the building square footage is for the buildings being demo'd. Therefore, those details need to be made clear and described in the text of the revised AQR and Draft SEIR.*

b) *The CalEEMod Output with the heading PEP - Phase 1 - Construction Only, shows an analysis for a 91.73 TSF junior college land use on 2.11 acres, general light industry of 79.40 TSF on 1.82 acres, 174.43 TSF of other non-asphalt surfaces on 4 acres, 107.57 TSF of parking lot land uses on 2.47 acres, and 21.80 acres of city park land uses. It is unknown what part of PEP Phase 1 is represented by the general light industrial land uses, other non-asphalt surfaces use and the 21.80 acres of City park uses. These details need to be included, in a similar manner as they were for PEP - Phase 2.*

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

Response 3

a) The square footage on page 15 is incorrect and should read 50,000 square feet for the Building A. The CalEEMod runs and Tables in the report are correct. The demolition of buildings necessary for the construction of Building A and G, is shown in the CalEEMod outputs as 57,391 square feet of building.

b) Since "stadium" construction is not listed as an option in CalEEMod, general light industrial use was used to simulate the construction of the stadium. PEP Phase 1 is shown in Exhibit 4 and this is the

area included in the PEP Phase 1 modeling. The parking lot and turf areas were measured off of this exhibit to determine the appropriate acreages for the uses listed.

c) There is not schedule for construction of the various elements of the project. Section 2.2.1.1 is an attempt to consider the potential impact of the overlapping phases of construction. It looks at all construction compressed into a 5 year period, which is very short, and looks at the pounds per day. All of the results are under the SCAQMD thresholds.

COMMENT 4

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

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

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

Response 4

The methodology presented in Section 2.2.1.1 takes analysis of construction emissions for a college Master Plan one step beyond what is normally done. Since no construction schedule is available at the Master Plan stage, construction emissions are often only qualitatively discussed. The methodology in Section 2.2.1.1 looks at a very aggressive 5 year buildout scenario and a more realistic 10 year buildout scenario and examines the daily construction emissions. Using the 5 year construction schedule, we believe, results in a very worst-case estimate of daily construction emissions.

COMMENT 5

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

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

Per SCAQMD recommendations, when measuring project emissions, it is appropriate to include regulatory requirements, such as the federal and state regulations that require vehicles to be more efficient and lower-emitting. However, "the proposed Project's emissions themselves should not be masked by comparing it to an existing condition baseline where air quality is worse than what it will be when the proposed Project is operational[1]" It is appropriate to assume that vehicles will comply with existing regulatory requirements; however their increase in activity and the additional 8,798 trips needs to be accounted for and shouldn't be masked by improvements brought on by those regulations. Therefore, the analysis of the project-related operational emissions should be remodeled using 3,745 additional students for year 2025 and a total of 7,153 additional students for 2025 buildout (as detailed in the Traffic Impact Study). Those emissions then need to be compared to the regional mass daily operational

thresholds to ascertain whether just the project-related increase in student vehicular traffic volumes exceed SCAQMD operational thresholds.

Response 5

CalEEMod allows two approaches for estimating emissions for operations from a college campus. One approach is to base the emission projections on projected student enrollment. The second approach is to use traffic data and other factors for the emission projections. The air quality assessment was necessarily prepared before the traffic analysis was complete and other data for the analysis was not available. Therefore, the approach used was the CalEEMod methodology based on student enrollment. CEQA requires that future cases be compared to existing, and that is exactly what has been done.

COMMENT 6

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

Response 6

It does not appear that the traffic forecast has changed.

COMMENT 7

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

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

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

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

Response 7

The 2020 Olympic Track and Field Trials will be a one time event, or at most once every four years. The local air quality was examined and reported in Section 2.2.4 of the AQR. Criteria pollutants were examined for campus wide activities in Section 2.2.2 and no impacts on regional air quality were found.

COMMENT 8

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

Response 8

The analysis is based on the 2012 AQMP which the adopted plan at the time of the preparation of the AQR. The 2016 AQMP has since been adopted by the SCAQMD Governing Board, but does not appear to have any new requirements for determining consistency.

COMMENT 9

Section 2.3.3 Diesel Particulate Matter Emissions During Construction. Please update this section to reflect the latest OEHA and SCAQMD-preferred methodology which uses a 30-year exposure instead of 70-year. As SCAQMD does not currently require construction-based HRAs, a discussion of the localized

construction-sourced PM emissions should be included, to show that construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local thresholds. Therefore, no significant short-term toxic air contaminant impacts are anticipated during construction of the proposed project. This statement could vary, depending on the results of the revised construction analysis.

Response 9

The assessment remains the same whether the exposure time is 30 years or 70 years. The comment is correct that the SCAQMD does not require health risk assessments for construction projects, and that is because they are of short duration and have no potential for generating significant cancer risks. A discussion of construction based particulate matter is presented and the potential for exceeding local thresholds is presented with results summarized in Tables 14 and 16 in the AQR. No additional analysis is needed.

COMMENT 10

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

Response 10

The AQR followed the lead of the traffic study. The traffic study focused its cumulative impact analysis on intersections, and finding little or no additional impacts it was determined that additional air quality analysis was not needed.

COMMENT 11

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

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

Response 11

The measure to require Tier IV construction equipment is already required by Measure 3f of the 2013 Mitigation Monitoring Program, and therefore, do not require an additional "discussion of the efficacy." Attached to these responses is the CalEEMod output that shows a mitigated value of 75.7 lbs per day.

COMMENT 12

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

Response 12

No new impacts have been identified, no changes to the statements in the AQR regarding unavoidable significant impacts need to be made.

COMMENT 13

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

Response 13

No changes need to be made. No additional impacts have been identified.

COMMENT 14

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

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

Response 14

While we disagree with the approach suggested in Comment 14. The following analysis summarized in the table below does follow the comment's suggest approach, still resulting in the same finding of no significant impact.

In the table below, the student enrollment and annual GHG gases (metric tons of CO2 equivalent) are presented. This information is taken directly from the GHG report Section 2.3. Using the projected student increases, the GHG emissions can be ratioed to find the CO2EQ generated by the student increase. These values do, in fact, exceed the first tier threshold of 3,000 metric tons per year. However, when the efficiency is calculated, which is the emissions generated per student, it is found that the values are well below 4.6 MTCO2EQ per year. Therefore, the conclusion remains the same, that a less than significant impact on climate change will occur.

	Student Enrollment	CO2EQ	Efficiency (1)
Existing	35,986	56,762	
Year 2020	39,731	55,764	
Year 2025	43,139	59,006	
Increase from Existing to 2020	*3,745*	*5,256*	*1.4*
Increase from Existing to 2025	*7,153*	*9,784*	*1.4*

1. Efficiency is annual emissions per service population (students)

COMMENT 15

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

Response 15

The square footage in the report is incorrect and should read 50,000 square feet for the Building A. The CalEEMod runs and Tables in the report are correct. The demolition of buildings necessary for the construction of Building A and G, is shown in the CalEEMod outputs as 57,391 square feet of building. No change to the analysis is needed.

COMMENT 16

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

Response 16

The 2020 Olympic Track and Field Trials are a one time event, or at most once every four years. The methodology used was consistent with the guidelines for CalEEMod. A once every four year event would have little effect on the annual GHG emissions.

COMMENT 17

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

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

Response 17

No changes need to be made. No additional impacts have been identified.

Comments 4.1.15: Comments included in Attachment E: Geologic Review (Group Delta Consultants) for the City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

Converse has provided direct responses to all relevant comments in the June 26, 2017 correspondence to Mr. Thomas F. Holm, ECORP Consulting, Inc. Converse developed its own comment and response index therein. *The large drawing included as attachments to the Converse response letter are included in Appendix C3 only, not in the responses below.*

Converse Consultants
Geotechnical Engineering, Environmental & Groundwater Science, Inspection & Testing Services

DRAFT – WORK IN PROGRESS

July 17, 2017

Ms. Rebecca Mitchell
Mt. San Antonio College
Facilities Planning & Management 1100
North Grand Avenue
Walnut, California 91789-5611

Subject: **RESPONSE TO GROUP DELTA GEOTECHNICAL REVIEW COMMENTS FOR CITY OF WALNUT ENVIRONMENTAL IMPACT REPORT (EIR) REVIEW**
Proposed Physical Education Project (PEP), Phase 1 and 2
Mt. San Antonio College
Walnut, California
Converse Project No. 14-31-124-03

References: Converse Consultants, Geotechnical Study Report (Final), Proposed Athletic Complex East, Mount San Antonio College, Walnut, California, dated January 23, 2015, Converse Project No. 14-31-124-01

Group Delta, City of Walnut Third Party Review of Geotechnical Study Report, City of Walnut, Mount San Antonio College, Physical Education Project (PEP), Walnut, California, dated June 26, 2017

Dear Ms. Mitchell,

Converse Consultants (Converse) provides this report in response to the City of Walnut Third Party Review of Converse Consultant's January 23, 2015, Geotechnical Study Report prepared by Group Delta Consultants, Inc., on June 26, 2017, for the proposed Physical Education Project (PEP), Phase 1 and 2, at Mt. San Antonio College in Walnut, California. This response report provides information for the Environmental Impact Report (EIR) review. The review comments and our responses are presented as follows:

1. Group Delta Review Comment:
No site plans which included proposed grades were available for review at the time of this letter.

Converse Response to Group Delta Review Comment No. 1:
Drawing No. 2, *Site Plan and Boring Location Map*, and Drawing No. 4, *Geologic Cross Section A*-A' through D-D', were included as oversize folded drawing figures placed in pockets at the end of the January 23, 2015 Geotechnical Study Report. The proposed grades for the project were shown on *Drawing No. 2, Site Plan and Boring Location Map*.

Attached Drawing No. 1, *Geologic Map of Site Vicinity*, and Drawing No. 2, *Geologic Section A-Aç B-Bç C-Cç D-Dç E-Eç F-F' and G-G'* , dated July 2017, are copies of those two oversize drawings which contain current project information and have been modified to provide geotechnical information requested by Group Delta for their EIR review comments.

2. **Group Delta Review Comment:**
Include a site plan with current and proposed grades as well as geology. Define maximum cuts and fills.

Converse Response to Group Delta Review Comment No. 2:
Attached Drawing No. 1, *Geologic Map of Site Vicinity*, shows the site plan with current grades, proposed grades and current geologic site information. The maximum cuts for the project will occur during removal of the existing hillside located along the west side of the West Stadium Grandstands. The proposed grading will remove the hill and create a large relatively flat pad for an athletic field. The original top of hill elevation was approximately elevation 846 feet. The hillside area has been partially cut down to the current interim grade elevations ranging from elevation 764 feet to 770 feet. Plan finish grade elevations for the new athletic field area will be cut down to approximate elevations 743 feet to 747 feet when grading is completed. The total maximum cut will be approximately 101 feet when completed (846 feet to 745 feet).

The maximum graded fill slope will likely be located below Building D near Borings BH-30 and BH-31. The planned fill slope will range in height between elevations 724 feet and 743 feet for a maximum slope height of approximately 19 feet.

3. **Group Delta Review Comment:**
CEQA Check list items for geologic hazards at the site including: fault rupture, strong ground shaking, lateral spreading, inundation, seiche, tsunami, volcanic eruption, and expansive soils; have been adequately addressed.

Converse Response to Group Delta Review Comment No. 3:
Acknowledged.

4. **Group Delta Review Comment:**
CEQA Check list items for geologic hazards at the site including: seismic history, liquefaction, land sliding, soil erosion/debris flow, flooding, and hazardous minerals; need to be further addressed as follows.

Converse Response to Group Delta Review Comment No. 4:
Additional information on the CEQA check list items for geologic hazards at the site are presented in the following responses to Review Comments 4.a to 4.f.

4.a **Group Delta Review Comment:**
Discuss any historical earthquake related impacts at the campus.

Converse Response to Group Delta Review Comment No. 4.a:
There are no known active or potentially active faults which cross or project towards the project site. The project site and campus are not located within a currently designated State of California Earthquake Fault Zone for surface fault rupture. The closest known faults to the project site with surface expressions are the San Jose fault (approximately 0.8 kilometers to the north) and the Chino-Central Avenue (Elsinore) fault (approximately 6.9 kilometers to the east / southeast). The San Jose and Chino-Central Avenue fault systems do not exhibit evidence of surface movement within Holocene time (0-11,700 years before present) and are not considered active based on current geologic information. The potential for fault-related ground rupture on the project site is very low to nonexistent and would not be considered significant.

The project site and campus are located within a seismically active region as is the case for most of Southern California. Ground shaking resulting from earthquakes associated with local and regional faults has occurred and will continue to occur at the project site and campus into the future.

Historically, the magnitude 5.5 Chino Hills earthquake on July 29, 2008 was one of the stronger ground shaking events experienced at the campus due to the proximity of the epicenter. Two students suffered minor injuries and as many as 40 buildings sustained cosmetic damage (ceiling tiles fell to the ground, books and picture frames and other items fell off shelves and shattered) when the tremblor rolled through the campus. The Division of the State Architect inspected the campus buildings and found no major structural damage and the campus was later reopened.

The Mt. San Antonio College campus is not exposed to greater than normal seismic risk for the Southern California area. The ground shaking hazard present on the project site and campus is considered significant, but mitigable through proper building design and construction, good engineering practices and emergency preparedness measures.

4.b Group Delta Review Comment:

Discuss historical high ground water at the site and relate to liquefaction analysis performed. Provide a discussion of liquefiable/dry seismic settlement layers and how it relates to stratigraphy encountered across the site.

Converse Response to Group Delta Review Comment No. 4.b:

Review of the Seismic Hazard Zone Report for the San Dimas 7.5-minute Quadrangle, Los Angeles County, California, Plate 1.2, does not show historically highest groundwater contours for the Mt. San Antonia College campus area. Converse has based our historical high groundwater levels on available well records from groundwater wells in the local basin area and direct field measurements of water levels during field exploration.

The project site is partially located within a potential liquefaction zone per the State of California Seismic Hazard Zones Map for the San Dimas Quadrangle (1999) as shown on Drawing No. 7, *Seismic Hazard Zones Map*, presented in the geotechnical report. The alluvial filled areas between the hills are composed primarily of dense/stiff, fine-grained sediments including silts, clays, silty clays, and clayey silt which are not prone to liquefaction. Liquefaction analyses were performed using LiquefyPro, Version 5.8n, 2012, by Civil Tech Software for the upper 50 feet below ground surface utilizing boring BH-14 and BH-26. The results of the liquefaction analyses indicate the project site is not susceptible to liquefaction or dry seismic settlement. The estimated potential seismically induced settlement ranges from approximately 0.67 to 0.87 inches with potential differential settlement ranging from approximately 0.34 to 0.44 inches. The project structural engineer should consider the effects of seismically-induced settlement in foundation design for structures built over alluvium.

There is little to no potential for liquefaction in the former hill area, adjacent hill slopes and eastern hills of the project site that are underlain by fine-grained sedimentary bedrock or composed of dense/stiff fine-grained soils located above the water table.

4.c Group Delta Review Comment:

Extend cross sections to include the perimeters of the site. Include significant slopes onsite and adjacent to the site. Discuss stability of proposed slopes and neighboring natural slopes and potential impacts to the proposed development. Provide a recommendation to address potential hazards.

Converse Response to Group Delta Review Comment No. 4.c:

Cross Section F-F' presented on Drawing No. 2, Cross Section A-A', B-B', C-C', D-D', E- E', F-F' and G-G', has been extended eastward into the undeveloped open space on the Mt. San Antonio College property to the western edge of the closed Spadra Landfill to illustrate the surface topography and subsurface ground conditions. The hillside slopes and intervening valley are covered by natural vegetation and fine-grained colluvial soil deposits derived locally from the hillside bedrock materials. The undeveloped open space area located east of the stadium is used for a cross country trail course and cattle grazing area. The natural hillside slopes appear to be grossly stable with no observed evidence of landslides or slope instability that would impact the project site.

The proposed grading for the project site will improve slope stability of the existing slopes within the site limits by completely removing the slopes to create level ground surfaces or laying the slopes back to create slopes gradients less than or equal to 2:1 (horizontal: vertical) as required by current grading codes. Appropriate non-erosive drainage control devices (brow drains, terrace drains, down drains, toe drains, catch basins, etc.) should be constructed on the slopes to properly control surface runoff and drainage. The graded slope surfaces should be landscaped and covered with jute mesh to protect them from surface erosion until the vegetation becomes well established.

4.d Group Delta Review Comment:

Identify surface drainage pathways onto and across the site and discuss potential impacts to the proposed development. Provide a recommendation to address potential flood hazard.

Converse Response to Group Delta Review Comment No. 4.d:

The existing project site has been constructed with an extensive system of storm drains that collect surface runoff from the track stadium, parking lots and surface streets and conveys it southward to suitable disposal points. The track stadium is drained through a 30-inch diameter CMP storm drain to a suitable disposal point. The storm drain systems consists of 6-inch, 8-inch and 15-inch diameter drain lines that collect runoff from surface drains and conveys it to a central 30-inch diameter CMP drain line located beneath the field areas that drains southward as shown on the attached Drawing No. 1, *Geologic Map of Site Vicinity*.

The western side of the project site is drained by an 84-inch diameter RCP storm drain that runs southward beneath Bonita Avenue. This storm drain system collects surface runoff from the parking lot areas and streets through 6-inch, 8-inch, 10-inch and 12-inch diameter HDPE pipes that are connected to storm drain catch basins and surface drains.

The north side of the project site is bounded by Temple Avenue that has a 60-inch diameter RCP storm drain that runs westward towards Grand Avenue and Snow Creek. This storm drain system collects surface runoff from Temple Avenue through curb side catch basins and 24-inch diameter RCP pipes connected to the main storm drain line beneath Temple Avenue.

The potential for flood hazard at the project site is very low provided the existing storm drain systems are kept clean and periodically maintained for proper operation. New storm drain systems consisting of catch basins, area drains and drain lines will be installed within the proposed Physical Education Project. The flat field surfaces will rely on sheet flow for drainage to local catch basins and subdrain systems.

4.e Group Delta Review Comment:

The California Geological Survey (CGS), Radon Potential Zone Map for Southern Los Angeles County, California, dated January 2005 (available online), indicates the site is located within an area with a moderate potential for indoor - radon levels above 4.0 Picocuries per Liter, the Environmental Health Division action level. Discuss the potential hazard and impacts to the proposed project. Provide a recommendation.

Converse Response to Group Delta Review Comment No. 4.e:

Review of the California Geological Survey (CGS), Radon Potential Zone Map for Southern Los Angeles County, California, Special Report 182, dated January 2005, indicates that the project site is in a “Moderate Potential” zone for indoor radon levels above 4.0 Picocuries per liter. A portion of the CGS Radon Potential Map for the project site area has been attached as Drawing No. 3, *Radon Potential Map*.

Radon gas is a naturally occurring radioactive gas that is colorless and odorless. It forms from the radioactive decay of small amounts of uranium naturally present in the underlying bedrock and soils. Because radon enters buildings from the underlying soils and bedrock, radon levels are typically highest in basements and ground floor rooms. The U.S. EPA recommends that individuals avoid long-term exposures to radon concentrations above 4.0 Picocuries per liter and that action then be taken to reduce indoor radon levels.

Radon potential maps help identify areas where geologic conditions are more likely to contribute to excessive indoor radon levels. Other factors influence indoor radon levels including local variability in soil permeability, climate conditions, building design, construction, condition and usage. Consequently, radon levels for a specific building can only be determined by indoor radon testing of that building, regardless of

what radon zone within which it is located.

To mitigate the "Moderate Potential" for indoor radon gas, we recommend the proposed building pads with ground floor living spaces be tested for radon gas. Should radon gas be detected above the action level, mitigation measures to control radon gas will be required for the building. Follow-up radon gas tests should then be performed once the building is completed to determine that the radon gas potential has been properly mitigated. Retesting for radon gas is then recommended every ten years.

4.f Group Delta Review Comment:
Discuss potential methane, oil and gas hazard and impacts to the proposed project. Include proximity to nearby landfills and active wells within 0.25 miles. Provide a recommendation.

Converse Response to Group Delta Review Comment No. 4.f:
Review of the State of California Division of Oil, Gas and Geothermal Well finder does not show any oil and gas wells on the project site or college campus. The closest active oil and gas production well is located approximately 0.9 miles east of the project site on the east side of the Spadra Landfill along the Thompson Wash. The active well is Well No. 2, owned by Spadra Oil Company for oil and gas production.

The Spadra Landfill is located approximately 470 feet to 580 feet east of the Mt. San Antonio Track Stadium as shown on Drawing No. 4, *Aerial Site Map*. The Spadra Landfill was closed in 2008. The Spadra Landfill is monitored and maintained by the Sanitation District of Los Angeles County. The Sanitation District continues to monitor and maintain the environmental controls on the landfill, which include groundwater and surface water monitoring, and landfill gas collection and control. No reports of gas or odors have been reported from the landfill.

No mitigation measures are recommended for the landfill provided the Spadra Landfill continues to be properly monitored and maintained by the Sanitation District of Los Angeles County in accordance with all applicable regulations and requirements.

5. Group Delta Review Comment:
Identify the general location and depth of buried canyon drain in relation to proposed buildings. Show on plan and cross sections. Discuss potential project impacts and provide a recommendation.

Converse Response to Group Delta Review Comment No. 5:
The location of the buried canyon storm drain system is shown on Drawing No. 1, *Geologic Map of Site Vicinity.* The buried canyon storm drain system consists of a 30-inch diameter CMP pipe that runs southward beneath the central portion of the track stadium. The storm drain is reported to be located approximately 5 to 10 feet below ground surface. The existing storm drain is not located below any building or proposed building. New storm drain lines may be installed during construction of the Physical Education Project.

6. Group Delta Review Comment:
Seismic parameters are calculated using the United States Geological Survey U.S. Seismic Design Maps website application. While the site coordinates (latitude and longitude) stated in Section 6.1 of the subject report appear to be incorrect (inconsistent with site coordinates noted in Section 2.1), based on our independent check, the values provided in Table No. 3 are in fact correct for the subject site. Update the table with appropriate coordinates.

Converse Response to Group Delta Review Comment No. 6:
The site coordinates presented on Page 1 under Section 2.1, Site Description, of the geotechnical report are correct as noted. The project site coordinates are North Latitude: 34.0459 degrees and West Longitude: -117.8371 degrees. The site coordinates presented on Page 12, Section 6.1, are for a different location on the Mt. San Antonio College campus.

7. Group Delta Review Comment:
The report also includes a site - specific hazard analyses as required by Section 1616A.1.3 of 2016 CBC, in accordance with Section 21.2 of ASCE 7 - 10. The site - specific response spectrum data, and seismic design parameters presented in Table Nos. 5 and 6, respectively, appear to be correctly evaluated, and adequately addressed.

Converse Response to Group Delta Review Comment No. 7:
Acknowledged.

8. **Group Delta Review Comment:**
The field exploration, laboratory testing, and analyses of subsurface conditions, appear to be adequate per Section 1803 of 2016 CBC, and meet the current local standard of care in geotechnical practice.

Converse Response to Group Delta Review Comment No. 8:
Acknowledged.

9. **Group Delta Review Comment:**
The report adequately provides grading recommendations per Section 1804 including need for over-excavation, and removal of unsuitable soils, canyon bottom subdrains, site drainage, subgrade preparation, re-use of on-site materials, compaction of fill material, cut/fill transitions, and trench backfill requirements.

Converse Response to Group Delta Review Comment No. 9:
Acknowledged.

10. **Group Delta Review Comment:**
The report provides adequate and generally reasonable recommendations regarding vertical and lateral capacity, and the anticipated static and seismic settlement of shallow foundations, and relatively short caisson foundations, as well as vertical and lateral capacity recommendations for cast-in-drilled-hole (CIDH) piles. The recommendations are generally in accordance with Section 1808, 1809, and 1810 of 2016 CBC.

Converse Response to Group Delta Review Comment No. 10:
Acknowledged.

11. **Group Delta Review Comment:**
The report provides lateral earth pressures for cantilever and restrained retaining walls with a level backfill, and additional surcharge for inclined backfill, as well as includes recommendations for retaining wall drainage. The report also provides seismic earth pressures for walls taller than 6 feet, as required by Section 1615A.1.6 of 2016 CBC.

Converse Response to Group Delta Review Comment No. 11:
Acknowledged.

12. **Group Delta Review Comment:**
A limited screening of soil corrosivity was included in the subject report. The report includes some preliminary corrosion mitigation measures, but recommends that a corrosion consultant be consulted for appropriate mitigation procedures and construction design. A more comprehensive corrosion evaluation should be performed as recommended in the subject report.

Converse Response to Group Delta Review Comment No. 12:
Acknowledged.

13. **Group Delta Review Comment:**
The report also includes adequate recommendations for temporary sloped and shored excavations. The recommendations for shored excavations include lateral earth pressures for cantilevered shoring, and braced shoring, recommendations for the design of soldier piles, recommendations for allowable capacity of drilled anchors, and surcharge pressures on the shoring.

Converse Response to Group Delta Review Comment No. 13:
Acknowledged.

Sincerely,

CONVERSE CONSULTANTS

Mark B. Schluter, PG, CEG, CHG
Senior Engineering Geologist

Siva K. Sivathasan, PhD, PE, GE, DGE, QSD, F.ASCE
Senior Vice President / Principal Engineer

Dist: 1/Addressee
Encl: Drawing No. 1, Geologic Map of Site Vicinity
Drawing No. 2, Geologic Section A-A', B-B', C-C', D-D', E-E', F-F' and G-G' Drawing No. 3, Radon Potential Map
Drawing No. 4, Aerial Site Map
Appendix A, Group Delta Review Comments for City of Walnut EIR Review dated June 26, 2017

Comments 4.1.16: Comments included in Attachment F: Cultural Resources Review (ECORP) for the City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

ASM Affiliates has provided direct responses to all relevant comments in the June 27, 2017 correspondence to Barbara Leibold, City Attorney, City of Walnut. Converse developed its own comment and response index therein.

July 20, 2017

Rebecca Mitchell
Facilities Planning and Management
1100 North Grand Avenue
Walnut, California 91789

Subject: Responses to Attachment F ECORP Consulting, Inc Comments on the PEP (Phase 1, 2) Cultural Resources Study

Dear Ms. Mitchell,

Roger Mason, Director of Cultural Resources at ECORP Consulting has provided comments on the Cultural Resources Technical Studies prepared by ASM Affiliates and on the summary of those reports in the PEP (Phase 1, 2) Draft EIR. In general Mr. Meson is in agreement with the technical reports and summary and has provided extensive comments on the technical study and summary.

When Mr. Mason has recommended revisions to the technical studies or summary, and the comments relate to significant environmental issues, they are quoted below, along with our response. The index to those comments is provided as an attachment to this response.

Comment 1

"I agree with the evaluation, analysis of impacts, and recommended mitigation measures in Appendix H. However, there is a repeated use of improper terminology. The correct term for a significant cultural resource as defined by CEQA is "historical resource" [CCR Title 14, Section 15064.5(a)]. However, the incorrect term "historic resource" is used in several places in the document. Instances of this occur in the third paragraph of the Executive Summary, the second paragraph of the Introduction, the first paragraph on page 65, and on pages 69, 71, 73, and 75."

Response 1

Agree with this comment, and the report will be revised to use the correct term.

Comment 2

"In addition, the Area of Potential Effects (APE) is used in the Executive Summary and in the Introduction. The term APE is used only in Section 106 (federal projects subject to NEPA) documents. For CEQA documents, the term project area or study area should be used."

Response 2

Agree with this comment, and the report will be revised to use the correct term.

Comment 3

"There is a minor issue with the mitigation measures. In Appendix H there was a summary paragraph for the measures for buildings to be demolished. This was followed by details of each measure contained in the summary paragraph. In the EIR, the summary paragraph has become CR-04 and the details of each measure are in CR-05 through CR-09. I don't think CR-04 should be a mitigation measure since it is only a summary of the rest of the mitigation measures."

Response 3

The comment is noted. No changes are required.

Comment 4

"A Statement of Overriding Considerations (SOC) is required for unmitigated significant impacts. The 2015 EIR refers to an SOC prepared for the 2012 EIR, but I do not see a reference to an SOC for the unmitigated significant impact resulting from demolition of the Stadium which was only analyzed in the 2015 EIR."

Response 4

The Statement of Overriding Considerations is not included in the PEP (Phase 1, 2) EIR but will be included and recommended for adoption for the Board of Trustees on August 9, 2017. There is no CEQA requirement to include or circulate the SOC with the Draft EIR or Response to Comments.

Comment 5

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

Response 5

Same as Response 1.

Comment 6

"The purpose of the AB 52 consultation process is to identify Tribal Cultural Resources that could be impacted by the project. AB 52 consultation is required for all CEQA documents for which a notice of preparation (NOP) is filed for an ND, MND, or an EIR after July 1, 2015. Since the NOP for the 2017 EIR was filed in April 2016 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. It is possible that no tribes requested consultation under AB 52, but if this is the case, this must be stated in the EIR."

Response 6

No tribes have requested consultation under AB 52. The issue is discussed in other responses other than the attachments. As noted elsewhere, the requests have been for project information only.

Comment 7

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

Response 7

Within the context of designation/nomination to the CRHR or NHRP, the stadium is "potentially eligible" since no nomination form has been prepared or submitted. Within the narrow CEQA context, the stadium is a historical resource, and was identified as such in the certified 2015 FMPU/PEP Final EIR. The comments do not identify a new significant impact or change the adopted mitigation measures for the stadium. Never the less, the change will be made in future discussions of the stadium.

Comment 8

"Also, historic resources should be changed to historical resources."

Response 8

Same as Response 1.

Comment 9

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

Response 9

Comment noted. Based on the Aquatic Center's features, it is highly probable the center can be renovated while retaining its historic elements.

Respectfully submitted,

Shannon Davis

Shannon Davis, M.A., RPH
Director, Architectural History

Attachment: Index to Comments of Attachment F

Comments 4.1.17: Comments included in Attachment G: Biological Resources Review (ECORP) for the City of Walnut, Barbara Leibold, City Attorney, July 3, 2017

Helix Environmental Planning Inc. has provided direct responses to all relevant comments in the June 28, 2017 correspondence to Barbara Leibold, City Attorney, City of Walnut. Helix Environmental Planning Inc. developed its own comment and response index therein.

Memorandum

HELIX Environmental Planning, Inc.
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Suite 200
La Mesa, CA 91942
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HELIX Environmental Planning

Date: 19 July 2017

To: Rebecca Mitchell

Cc: Sid Lindmark

From: W. Larry Sward

Subject: Mount SAC 2015 Facilities Master Plan and Physical Education Projects

HELIX Proj. No.: SAC-07

Message:

This memo addresses comments on the Biological Technical Appendix for the Mount SAC 2015 Facilities Master Plan and Physical Education Projects. Comments were provided in a letter by ECORP Consulting, Inc., addressed to Barbara Liebold, City Attorney for Walnut, and dated June 28, 2017. Two comments require a response. These are listed here along with our response.

Comment 1

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

Response 1

Slender-horned spineflower is commonly known as a Riversidean alluvial fan scrub species. There are several collections, however, in non-Riversidean alluvial fan scrub riparian habitat in southwestern

Riverside County. While the probability of this species occurring at Mt. SAC is highly unlikely, we did not feel the probability was zero.

Nevin's barberry is an evergreen shrub that can be identified vegetatively, and so can be detected any time of the year. The probability of this species occurring in this project area at Mt. SAC should have been "none".

This comment on the potential to occur for these two species and our response does not change the analysis or subsequent conclusions for the biological impacts of this project, as reported in the biological technical appendix or the EIR.

Comment 2

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

Response 2

We agree with the comment that non-native grassland is usually not considered a sensitive resource in this region. It was identified as being sensitive in this report as part of our efforts in writing a report with a conservative approach to assessing resource sensitivity. Even with this approach the impact to non-native grassland was deemed insignificant due to the small area (i.e., 0.1 acre) to be impacted by the project.

This comment on the sensitivity of non-native grassland does not change the analysis or subsequent conclusion for the biological impacts of this project, as reported in the biological technical appendix or the EIR.

Section 5.0: Interest Group Comments with District Responses

5.1 United Walnut Taxpayers, Layla Abou-Taleb, President, July 1, 2017

Please note that the Notice of Completion for the Draft SEIR was released on May 19, 2017. While the comment letter title states it is a response to the NOC, we presume the comments provided are comments on the Draft SEIR.

Comment 5.1.1: *The proposed deferral of addressing traffic and parking mitigation to a future date pending a future traffic study in 2020 is not allowed under CEQA. As such the SEIR does not present an adequate or complete document and a "good faith effort at full disclosure" as required by CEQA guidelines.*

Response 5.1.1: This comment was previously addressed in the Response to Comments on the 2015 FMPU/PEP EIR. Presumably it refers to mitigation measure TR-28: "Beginning in 2015, whenever a traffic/parking study for a FMP has not been completed in five (5) years, a new parking study shall be completed. The parking study shall specify the total parking supply required and a timeframe for providing the required number of campus parking spaces. Facilities Planning & Management shall ensure compliance."

The traffic study addressed all project traffic impacts at area intersections. The measure (i.e. TR-28) assures that the parking provided on campus at any period of time in the future is based on the projected enrollment in periods when a traffic/parking analysis has not been completed for a facility master plan. For example, if no facility plan and associated traffic/parking analysis was completed before 2025, and the enrollment increased substantially, the current 2020 parking requirement in the 2015 FMPU/PEP would not be appropriate for the 2025 enrollment. The measure is not a deferral of addressing parking demand but a measure to assure the future parking supply is consistent with the future parking demand.

Comment 5.1.2: *Table 2.5 of page 43 list the City of Walnut as "Interested" Party, UWT believes and the court affirmed that the City of Walnut is the Primary Agency responsible for the review and approval of grading and truck hauling plans.*

Response 5.1.2: Table 2.5 is hereby revised to indicate the City of Walnut is a Responsible Agency. However, its authority is limited to the items cited. In regards to other environmental issues, the city is an interested party.

Comment 5.1.3: *While on page 57 the report states ".. any intersection operating at LOS A-D without project traffic in which project traffic caused the intersection to degrade to LOS E or F must mitigate the impact to bring the intersection back to at least LOS D. Table 5 of page 59 indicates otherwise at three intersections. It is unacceptable that this negative impact can be addressed by the board of trustees overriding consideration as recommended in by the NOC. This negative impact is also shown in Tables 3.17 and 3.18 of Page 75.*

Response 5.1.3: Table 5 is a Cal Poly traffic analysis of the impact of Parking Structure 2 on the intersections cited. It is not an analysis of the PEP project on these intersections. Cal Poly Pomona is the Lead Agency. The Temple/Campus intersection is mitigated to less than significant by the improvements recommended by Cal Poly. The PEP EIR does not discuss mitigation for the other intersections and is not required to do so. Table 5 is cited because it represents prior analysis completed for Parking Structure 2 at the Temple/Campus intersection.

Table 3.17, 3.18 is the analysis of existing + Project + cumulative conditions in 2020, 20125. Table 3.19, 3.20 is the analysis of the same scenario with mitigation. As stated on page 77:

The Campus Drive/Temple Avenue intersection is reasonably built-out to its maximum configuration, thus no additional improvements are feasible. The cumulative impact could be partially mitigated by adding an additional westbound right-turn lane. However, the high cost of widening the Temple Avenue Bridge over the wash is prohibitive and the improvement is considered infeasible. Therefore, an adverse impact remains for cumulative conditions in 2025.

Intersection improvements are feasible at some locations and not feasible at others. While the standard is correct, a Lead Agency may adopt a Statement of Overriding Considerations (SOC) for any environmental impact. The agencies reason for doing so may be that the improvement is not feasible, but other considerations, like cost may also be cited. The Lead Agency is required to state its reasons why a significant impact is acceptable in its judgment without further mitigation.

Comment 5.1.4: *As stated in UWT's comments on the NOP Draft Subsequent Project and Program EIR for 2015 Master Plan Update and Physical Education Projects (February 10, 2016), Mt. SAC is proceeding with the unlawful use of Measure RR funding for ongoing and proposed activities of the Physical Education (new stadium) Project, because this facility was not explicitly named in Measure RR language made available to voters. This means that voters were unaware when casting their ballots that these significant expenditures of funds would be made by Mt. SAC on the new stadium, which would be repaid through their property taxes for many years. The United Walnut Taxpayers has provided Mt. SAC with formal notice to our objection of this unlawful expenditure of Measure RR*

funds on the Physical Education (new stadium) Project in our Compliant to the LA Superior Court (March 24, 2015), in our comments on the Notice of Preparation Draft Subsequent Project and Program EIR for 2015 Master Plan Update and Physical Education Projects (February 10, 2016), to the LA Superior Court (June 12, 2017), and again in these comments to the NOP of the Physical Education Project (Phase 1, 2) Draft SEIR Report (July 2017).

Measure RR has been characterized as a "Classroom Repair, Education Improvement, Public Safety/Job Training Measure" supporting educational interests of Mt. San Antonio College by highlighting needs to renovate, construct and update classroom facilities for technology adequacy. Measure RR devotes few words to the notion of renovating or constructing any type of athletic facility with the words, "phase two athletic complex, including hard courts, gym, fields and tracks," let alone any reference to the subject massive stadium reconstruction project.

Mt. SAC, in the NOP for the SEIR 2015 Master Plan Update, and once again in NOP of the Physical Education Project (Phase 1, 2) Draft SEIR Report, remains resolved to change the objective of Measure RR by characterizing the expensive new stadium reconstruction project as a "Physical Education Project" which changes the name from the previous "Athletic Complex" in an effort to mislead citizens and loosely associate it after-the-fact with the word "education" referenced in Measure RR.

Response 5.1.4: The comments do not directly address environmental impacts of the project, but reiterate legal assertions by UWT in their lawsuit before the Superior Court. These issues will be resolved by the Court and no response is required herein.

Comment 5.1.5: *Two of the Project alternatives listed on Table 7.1, are no longer available as it is regrettable that the historic stadium and all auxiliary building were demolished, without any consideration to the historic value of the stadium to the Walnut residence. The fact is that stakeholders are left only with 2 alternatives which amount to the same end result which is a new PEP. As such the SEIR does not present an adequate or complete document and a "good faith effort at full disclosure" as required by CEQA guidelines.*

Response 5.1.5: As stated in the Draft EIR, "The majority of the information in Section 7.0 is not new; it was included in the 2015 FMPU/PEP Draft EIR. Alternative 2: Parking Structures (i.e. on campus not on PEP site) from the prior EIR is deleted. The revised section is reiterated herein for the reader's convenience*."*

The PEP project was approved by the Board of Trustees based on the certification of the 2015 FMPU/PEP Final EIR on October 12, 2016. This Draft Subsequent EIR addresses the impact of the PEP project on two additional intersections. The no- project alternative and the no 2020 Olympic Track & Field Trials alternatives are appropriate alternatives in the context of the two intersections being studied. Both alternatives result in no project impact at the two intersections.

Mitigation measures for PEP project historical resources were included in the 2015 FMPU/PEP Final EIR (i.e. see Mitigation Measures CR-01 to CR-10), and a Statement of Overriding Considerations was also adopted for project impacts on historical resources. The District has, or will implement all adopted mitigation measures for the PEP project during project completion. Walnut residents have had multiple opportunities to review and comment on District plans for the stadium area and historical issues on campus in its CEQA documents. Demolition of the stadium was based on city agreements under health and safety abatements for vacant structures and did not require City review or approval.

Comment 5.1.6: *Page 15 Addresses Mitigation measures regarding the Biological Resources (BIO-17) and states: "If clearing, grading, or construction will occur from Feb 1 – July 31, pre-construction surveys shall be conducted in the construction area and in appropriate nesting habitat within 500 feet of the construction area." The demolition and multiple activities have occurred in the period mentioned above, UWT demands that Mt SAC provides its survey reports to the stakeholders, if conducted, if not then that*

will be violation of the Biological Study conducted by its own consultants.

Response 5.1.6: See Response 4.1.1. Demolition of the stadium was based on city agreements under their health and safety abatement regulations for vacant structures. CEQA clearances for demolition were obtained upon certification of the 2015 FMPU/PEP Final EIR.

Pre-construction surveys must be completed within 14 days of the beginning of construction or during specified months of the year (see BIO-06, BIO-17 in Appendix H1). The surveys will be completed as required. For the stadium area, the breeding season is January through August. If the PEP (Phase 1) is initiating before September a pre-construction survey will be completed as required.

Comment 5.1.7: *Proposed Disposal of Excess Dirt from the Stadium Hill to the West Parcel Important legal proceedings of the Los Angeles Superior Court in the past several months will prevent Mt. SAC's ability to depose of excess dirt from what is commonly known as the stadium hill at the Physical Education Project to its proposed disposal area at the West Parcel because of legally defective CEQA documents cited therein.*

On May 4, 2017, Judge James C. Chalfant (Department 85, LA Superior Court) issued a Peremptory Writ of Mandate concerning the West Parcel Solar Project (Attachment 1), which included his Judgment on Consolidated Actions, United Walnut Taxpayers (UWT), City of Walnut and Mt. San Antonio College by incorporation, May 4, 2017 (Attachment 2) and by reference incorporated his March 14, 2017, Decision regarding Petitions for Writs of Mandate by UWT, the City of Walnut and Mt. SAC (Attachment 3).

In his Judgment, Judge Chalfant states: "as to UWT' s Fifth Cause of Action based on a District pattern and practice of improperly using programmatic EIRs to approve master plan program projects (2002 to 2012 EIRs) in a legally defective manner, UWT is entitled to judgment for declaratory and injunctive relief".

Specific to the West Parcel Solar Project, Judge Chalfant ruled in his Peremptory Writ of Mandate: "Mt. San Antonio College shall set aside all approvals, including the Addendum for their development of their "West Parcel Solar Project" on undeveloped land south of Temple Avenue/Amar Road and west of Grand Avenue, in the area commonly known as the "West Parcel" (APN 8709-023-917 (the "Project")."

Judge Chalfont further states in his Writ: "Respondents are further restrained from taking any action in furtherance of the project unless and until they prepare and circulate an initial study for the project and thereafter prepare appropriate CEQA documents and/or make an appropriate CEQA determination and finding."

On June 28, 2017, Mt. San Antonio College President Bill Scroggins, consistent with Judge Chalfant's May 4 Writ of Mandate and Judgement, recommended and the Board of Trustees took action and approved his recommendations (Attachment 4) stating:

"It is recommended the Board of Trustees set aside approvals for the West Parcel Solar Project and the Addendum to the 2012 Master Plan Environmental Impact Report, as presented."

Judge Chalfont's Writ of Mandate and Judgment (May 4, 2017), and the Mt. SAC Board of Trustees Action (June 28, 2017) renders invalid the Los Angeles Regional Water Quality Control Board's Technically Conditioned Water Quality Certification of the Proposed West Parcel Solar Project (May 23, 2016) and the California Department of Fish and Wildlife's Streambed Alteration Permit for this project. Specifically, Judge Chalfant has "set aside" the fundamental CEQA basis for the Water Quality Certification and Streambed Alteration Permit and now requires Mt. SAC to "prepare and circulate an initial study for the project and thereafter prepare appropriate CEQA documents and/or make an appropriate CEQA determination and finding." As a result the West

Pacel is no longer available as a disposal area for excess dirt from the PEP stadium hill.

Mt. SAC has initiated the new CEQA process for solar generation ordered by Judge Chalfant and consistent the Board of Trustees Action, which has "set aside approvals for the West Parcel Solar Project and the Addendum to the 2012 Master Plan Environmental Impact Report". The United Walnut Taxpayers will actively participate in Mt. SAC's preparation of "appropriate CEQA documents" for the proposed solar generation project, and specifically requests Mt. SAC evaluate a suitable array of alternative locations and methods of solar generation, such as solar panels mounted atop parking lot canopies.

Response 5.1.7: The comments address ongoing litigation between the District and UWT in Superior Court of Los Angeles County related to other District projects. The comments do not address environmental issues that are central to the PEP impact on two additional intersections in the City of Pomona. The District could export earth from the stadium hill to other areas than the West Parcel. Therefore, the PEP project could be completed with no linkage to the West Parcel Solar project. However, the District is currently pursuing both projects.

Section 6.0: Individual's Comments with District Responses

None to date

Section 7.0: New Information Added to the Draft EIR

7.1 This Response to Comments document does not identify any new significant impacts of the project or identify any additional new mitigation measures that must be implemented for potential project impacts. The Response to Comments also does not identify any feasible new alternatives that must be considered.

Therefore, the 2015 FMPU/PEP Final EIR certified in October 2016 and the PEP (Phase 1, 2) Final EIR recommended for certification on August 9, 2017 comprises an adequate and sufficient CEQA documentation for the potential environmental impacts of the PEP (Phase 1, 2). As indicated in the State Clearinghouse comments of July 3, 2017, the District has complied with all state requirements for processing of CEQA documents (Appendix A15).

For informational purposes only, the District is informing interested persons that the District may use the areas of PEP (Phase 1) planned for synthetic turf and natural turf practice fields east of Building 47 between Lot R South and Lot 50G for a 300-space temporary parking lot during construction of the PEP. This temporary parking project is not the subject of this SEIR. If the 300-space parking lot (Appendix F4) proceeds, it will be subject to independent CEQA evaluation.

Section 8.0: Revised Information Added to the Draft EIR

8.1 Location of the campus relative to Interstate 10.

13. Location and Setting .1st paragraph. 1st sentence should be corrected to indicate Mt. SAC is located *south* of Interstate 10.	*R13. The comment is noted and hereby revised.*

8.2 Specific interest of the City of Walnut in Table 2.5.

26. Table 2.5 Responsible and Interested Agencies. Identify City of Walnut as Responsible Agency for Grading and Truck Haul Plans.	*R26. The comment is noted and hereby incorporated into the DEIR.*

8.3 Consistency in type of Draft EIR document.

31. Reference to Supplement to an EIR is incorrect. The current SEIR is described as a Subsequent EIR.	*R31. The comment is noted and hereby corrected in the Final EIR.*

8.4 Correction of internal reference.

51. Page 100, 1st paragraph. Unable to locate Section 3.10 referenced here.	*R51. The proper reference is Section 5.1 – 5.3 and is hereby added to the Final EIR.*

8.5 Clarification and correction of project alternative conclusions.

59. Table 7.1 Project Alternatives Comparisons. This table identifies Alternative 1-Revise Physical Education Project 2020 as the Environmentally Superior Alternative. [15126.6(2)]. Yet, the Preferred Alternatives (page 116) indicates Alternative 1 is not the 'superior' alternative. Please explain this apparent discrepancy. There is no prior discussion of the California Black Walnut Management Plan (CBWMP) and Land Use Management Area (LUMA) in Section 7.0 or elsewhere in the SEIR to support the assertion that the benefits of these make Alternative 2 the environmentally superior alternative. Moreover, there is no explanation why the CBWMP and LUMA cannot be implemented with Alternative 1.	*CR-59 Table 7.1 provides a relative ranking of the alternatives based on environmental issues only. The discussion on page 116 includes multiple factors, including environmental, educational objectives etc. The no-project alternative is the environmentally superior alternative but The paragraph is hereby revised as follows:* *If the environmentally superior alternative is the no-project alternative, Section 15126.6 (2) of the CEQA Guidelines requires another project alternative be identified as environmentally superior among the remaining alternatives. However, the no-project alternative is not the designated "superior" alternative. While the no-project alternative does not demolish Hilmer Lodge Stadium, a potential contributor to the historic district, the benefits of implementing the California Black Walnut Management Plan (CBW) and the implementation of the Land Use Management Area would not occur. The no-project alternative also does not meet the educational objectives and facility needs of the District.* *Since Alternative 2 has less historic impacts than the project, implements the CBW and LUMA plans and meets some but not all of the educational objectives of the District, Alternative 2 is the*

	environmentally superior alternative. Alternative 2 does not include hosting the 2020 Olympic Track & Field Trials.

None of the revisions made to the Draft EIR identify new environmental impacts of the project.

8.6 Revision in the District's Threshold of Significance for Construction Noise (Effective May 11, 2016) on page 9 – revision applies to usage of "more" therein:

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

8.7 Revised Consultant Address for Iteris, Inc. in Section 10.

801 South Grand Ave, Suite 530
Los Angeles, CA 90017
213.488.0345

Section 9: Appendices

A. Notices

B. Comments on Draft EIR

C. New Information

D. PEP Mitigation Program

E. Additional Correspondence