MEMORANDUM

TO: Gary Nellesen, Director of Facilities

FROM: Sid Lindmark, AICP

RE: CEQA Clearances for the West Parcel Solar (WPS) Project (Site-Specific Plans)

DATE: September 9, 2015

1.0 Introduction

To comply with the California Environmental Quality Act ("CEQA"), in December 2013, the Board of Trustees certified the "Final EIR" for the Mt. San Antonio College 2012 Facility Master Plan (SCH 2002041161) ("FMP") and adopted the Facts and Findings and a Statement of Overriding Considerations and Mitigation Monitoring Program. The Final EIR evaluated the potential significant effects of a West Parcel Solar/Retail Project ("Project") in Section 3.9 on the "West Parcel," which is located on the Southwest corner of the campus.

Since the certification of the Final EIR, The Facilities Planning & Management Department has completed numerous site specific studies for the Project, and Helix Environmental Inc., in addition to several civil engineering firms, has completed numerous additional technical studies to comply with permitting requirements for Responsible Agencies. The Board of Trustees is now considering awarding the contract for the Project based on the Request for Statement of Qualifications and Request for Detailed Proposal for The Assessment, Design, Installation, and Operation and Maintenance of Photovoltaic System (Design/Build Contract, Bid 3005, June 19, 2015).

This memorandum reviews whether a further EIR is required. Based on the Bid 3005 and new technical studies, this review identifies if additional CEQA documentation for the currently defined Project is required, and examines whether the Final EIR is adequate and sufficient for the site specific characteristics (as described herein) of the Project. Thus, this memorandum compares the Project as currently defined in the Bid 3005 to that specified in the FMP and Final EIR to determine whether the currently defined Project would create a new significant environmental impact not analyzed in the Final EIR or would substantially exacerbate a significant environment impact already disclosed in the Final EIR.

There is considerable public confusion in these proceeding concerning the prior actions the Board of Trustees ("Board") has taken (i.e. approval of the 2012 FMP and certification of the Final EIR in December 2013) and the actions the Board is now considering in September 2015 (i.e. approval of a contract for construction of the one of the projects included in the 2012 FMP). These issues are addressed in Section 5.0.

2.0 Certified CEQA Documentation for the Project

The 27.7-acre West Parcel was designated a Future Asset Management Zone in the 2002 Campus Master Plan (Exhibit 4 in the 2002 Final EIR). The 2005 and 2008 Master Plan Updates did not change this designation. (The biological resources onsite were first evaluated in the Mt. San Antonio College 2008 Master Plan Update Biological Technical Report, Helix Environmental Planning, Inc., April 24, 2008). The FMP changed the designation for the West Parcel as a Future New Building or Expansion Zone to a Solar & Retail District. Section 3.9 of the Final EIR evaluated a solar array plan for a 1.5 – 2.0 MW electrical output system with steel support systems of 6 – 10 feet in height and panels extending 3 – 6 feet above the support structures on 10.6 acres. The retail portion of the Project was assumed to be 20,000 square feet. Grading for the West Parcel was estimated to remove 8.7 acres of Coastal Sage Scrub and 9.5 acres of Non-Native Grassland (Helix, *Ibid*.) The preliminary grading plan estimated import of 261,000 cubic yards of earth (see Exhibits 14 in the draft EIR and Final EIR).

The revised Exhibit 14 in the Final EIR (i.e. Response to Comments) did not have grading quantities indicated on the 10.6-acre pad area Project Site Plan. However, the Final EIR (Item 10: Response to Comments, p. 6) described a revised 2.0 megawatts (MW) project on a 10.6-acre pad with 333,980 cubic yards of import with a pad elevation of 770 msl (Grand Avenue Parcel Earthwork, Exhibit D-5, Psomas, September 5, 2013). The current grading quantities are 172,708 cubic yards of cut, 336,279 cubic yards of fill for a net import of 163,571 cubic yards (Psomas, Michael Mulgrew, PE, July 6, 2015). The earth import for the Project is originating from the Athletics Complex East site on campus. The construction equipment onsite and total hours of operation are based on the equipment characteristics (e.g. horsepower and earth capacity) and are selected when the construction manager initiates the Project.

With the recommended mitigation measures in the 2012 Mitigation Monitoring Program, the biological resource impacts of the Solar/Retail project were Less than Significant with Mitigation Incorporated.

The potential air quality construction and operational daily emissions for the Solar & Retail project were evaluated in Section 3.2: Air Quality, Table 3.2.12 and the Localized Construction and Operational Emissions (LST Analysis) at 50 meters were evaluated in Table 3.2.14. Construction emissions were projected to exceed the daily limit for particulate emissions (PM_{10}) only within 50 meters during the first phase of grading. While the adopted air quality Mitigation Measures 3a – 3j in the 2012 Mitigation Monitoring Program will further reduce PM_{10} emissions from that stated in Tables 3.2.12, 3.2.14, some emissions may exceed the daily standard when construction equipment is operating near the Project's southerly boundaries. Therefore, the analyses concluded the construction emission PM_{10} impact was unavoidable adverse. The Board of Trustees adopted a Statement of Overriding Consideration, as one of the unavoidable adverse effects of the 2012 FMP, to address this issue.

3.0 Project Description

The project description is similar to that initially described in the Final EIR but more detail is now available on its site characteristics. As described in the permit applications, the Project is for a design-build agreement for the purchase and installation of a ground-mount solar photovoltaic system, which

will provide approximately 2.2 MW of clean power for the campus. Since the FMP and Final EIR describe a 2.0-MW photovoltaic system, this project description remains consistent with the Final EIR. The solar photovoltaic system is known as a TerraSmart Racking System. The height of the solar installation varies depending on the angle and length of the photovoltaic panel (Caryn Cowin, Facilities, Mt. SAC, July 6, 2015). The design of the solar array layout within the Project pad area has not been completed but will be designed by Borrego Solar Systems, Inc.

The interconnect system transmits solar power from the Project to the campus by an underground conduit. The conduit will cross under Grand Avenue from the project site to the road south of the Wildlife Sanctuary. The conduit will proceed north along Mt. SAC Way, cross under Temple Avenue and extend along the north side of Temple Avenue to the main switchgear near Temple Avenue.

The physical layout of the solar array area onsite is not known at this time. The solar array area in Exhibit 1 is symbolic only. However, the solar array pad area comprises 10.6 acres of the 17.2-acre graded site area. The remaining 10.5 acres of the West Parcel is natural habitat. The terraced area along the site interior, which will be restored habitat, is 0.58 acres (Exhibit 1). The slope along Grand Avenue and the terraced areas near the western perimeter are heavily landscaped, as shown in Exhibit 5. The planting plan results in installing 6,453 plants and hydro-seeding areas with a Venturian coastal sage scrub mixture.

The total graded area has decreased slightly from the 18.2 acres used in the 2012 Final EIR to 17.2 acres but the solar array pad area has increased from 9.9 acres to 10.6 acres. The elevation of the future solar array pad in the Final EIR was 770 feet mean sea level ("msl"). The latest Project site plan has a pad elevation of 761 feet msl, which is nine feet lower (Exhibit 3) than the site plan in Exhibit 14 in the Final EIR. The height of the Project slope along Grand Avenue accounts for the larger pad area. The pad perimeter near the off-site residential land uses is unchanged. The acreage proposed for terracing along the westerly perimeter of the pad area has increased (Exhibit 1) from that proposed in Exhibit 14 of the Final EIR. The terracing will be restored habitat at build-out.

The Borrego Solar Systems project management schedule indicates that the Project will be substantially completed on January 25, 2016 and closeout is expected to occur on March 25, 2016. The Final EIR stated that the Project solar array system would be a tracking system in which the solar panels rotate to capture the maximum amount of sunshine. The proposed system design is now a fixed-tilt solar panel system.

The preliminary construction schedule is 247 working days, which may be divided into six phases: (1) Site preparation (21 days), (2) Grading including earth import (130 days), (3) Finish grading (20 days), (4) Landscaping (62 days), (5 Habitat restoration (62 days) and (6) Solar installation (76 days). Some phases are concurrent. Construction activities will only occur Monday through Saturday from 7 a.m. to 7 p.m. The start date is dependent on approval of all permits from Responsible Agencies. The construction period is projected as approximately one year.

4.0 Requirements for Additional CEQA Documentation (Section 15162)

The CEQA Guidelines state that when an EIR has been certified for a project, no additional CEQA documentation shall be prepared unless the Board of Trustees determines, on the basis of substantial evidence in the light of the whole record, one or more of the following is true:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environment effects or a substantial increase in the severity of previously identified significant effects.

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR.

(b) Significant effects previously examined may be substantially more severe than shown in the previous EIR.

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(4) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce new or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

(5) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As described above, the project description in Section 3.9 of the FMP is substantially the same as the current Project. There were no mitigation measures that were identified as infeasible or which are considerably different from those analyzed in the Final EIR that the Board of Trustees declined to adopt.

When repetitive requirements of section 15162 are combined, the criteria used to determine if additional CEQA documentation is required for the Project are:

(1) Are their new significant environmental impacts that were not analyzed in the Final EIR and,

(2) Are there substantial increases in the severity of significant environmental impacts disclosed in the Final EIR?

(3) Are there mitigation measures or alternatives that were not considered in the previous EIR and should have been considered?

Under some circumstances, a draft Environmental Impact Report ("EIR") is required to be re-circulated for additional public review (CEQA Guidelines, Section 15088.5). However, this requirement only applies when significant new information is added to the draft EIR after the public review period is initiated and before certification. No significant new information was added prior to certification of the Final EIR. Therefore, the District has a certified Final EIR that includes the Project and recirculation is not required.

However, as discussed above, the further developed site-specific characteristics of a project are compared to the evaluation of significant environmental impacts identified in a certified EIR to determine if additional CEQA documentation is required.

5.0 Adequacy of Existing CEQA Documentation for the Project

As stated in Section 1.0, there is considerable public confusion in these proceedings of the actions the Board has taken in the past (December 2013), and the actions being taken now (September 2015) regarding the WPS Project. Six areas of confusion (C-1 to C-6) are discussed below.

C-1: The first area of confusion is the CEQA terminology used when referring to the types of EIR. The 2008 and 2012 Final EIRs are Subsequent EIRs. (A single EIR may also be referred to as a Project EIR). The CEQA Guidelines provide the distinctions between the various documents.

Article 11: Types of EIRs in the CEQA Guidelines defines the terminologies. A Project EIR examines the environmental impact of a specific development project (15161). A Program EIR (15168) is prepared for a series of actions that can be characterized as one large project that is related geographically or logical parts in a chain of contemplated actions. A Supplement to an EIR (15163) is prepared when only minor additions or changes are necessary to make a previous EIR adequate (i.e. complies with CEQA) for the project as revised. Each of the four District Final EIRs evaluates the potential environmental impacts of a distinct Facility Master Plan. When a Master Plan is updated or changed, the change is either minor or more substantial. Similarly, the environmental setting for a project on campus may change and new impacts or an increase in severity of the impact may occur. For the 2012 FMP, the change included a new site-specific project (i.e. WPS) not fully evaluated in the prior EIRs and several changes in the components of the FMP. Therefore, the 2012 Final EIR is a Subsequent EIR.

C-2: Fundamentally, the second confusion is centered on the specialized use of the word, "Project" in CEQA and the use of the word "project" outside its legal context. The confusion is increased

since there are two meanings of "Project" in Section 15378 of the CEQA Guidelines; both occurring for the WPS. As stated in Section 15378 of the CEQA Guidelines:

(a) "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

> *(1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code 65100-65700.*
>
> *(2) An activity undertaken by a person which is supported in whole or in part through public agency contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.*
>
> *(3) An activity involving the issuance of a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.*

The Board adopted the 2012 FMP and certified the Final EIR in December 2013. The "Project" in that approval included approval of the WPS project. The Board is now considering approval of a contract for design and construction of the WPS. This action is not any of the activities described in subsection (a) (3).

C-3: A third area of confusion is how the District has complied with CEQA in the past and what, if any, actions are needed now to comply with CEQA concerning the WPS Project. These issues were outlined in Section 4.0 and are being discussed in Section 5.0.

C-4: The fourth area of confusion is the nature of a discretionary project in CEQA and a ministerial project. The former are subject to CEQA and the latter are not subject to CEQA. Section 15357 of the CEQA Guidelines states:

> "*Discretionary project" means a project which requires the exercise of judgment or deliberation when the public agency or body decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statues, ordinances, or regulations.*

Section 15369 of the CEQA Guidelines states:

> *"Ministerial" describes a governmental decision involving little or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented but uses no special discretion or judgment in reaching a decision.*

The Board acted in December 2013 to adopt the 2012 FMP as revised by the Final SEIR (i.e. a discretionary project), which included the WPS project. The Board is now considering approval of a contract that results in the construction and operation of the WPS Project. The CEQA clearance for the WPS Project as a component of the FMP occurred in December 2013 with the certification of the Final EIR, the approval of a Statement of Overriding Considerations, and the approval of a mitigation monitoring program.

A ministerial action required by the District is whether the WPS conforms to the requirements of Mitigation Measure 1(a) which states: All future land uses on campus, building locations and square footage (ASF) shall be substantially consistent with the 2012 FMP. Facilities Planning & Management shall ensure compliance. Since the WPS is not subject to ASF requirements, which are issued by the California Community College Chancellors Office for classroom, lecture and laboratory space, the only compliance issue for the WPS is whether the land uses are consistent with the FMP. Since a Solar & Retail designation was included in the Campus Zoning Plans in the Final EIR (Exhibit 7) and the environmental impacts were identified in Section 3.9 of the Final EIR, the WPS is consistent with Mitigation Measure 1(a).

C-5: The fifth area of confusion is whether the existing CEQA documentation for the WPS project is sufficient and where that documentation is located. What may appear at first glance as an incomplete CEQA analysis for a site-specific project in a single Supplemental EIR is not superficial because the comprehensive CEQA analysis occurs in several EIRs (Section 2.0). Only new or revised project impacts are evaluated in the latest EIR. Biological impacts of the WPS Project were first evaluated in 2008 and, the permit applications to four Responsible Agencies in 2014 - 2015 included three additional biological studies, a cultural resource study, a geotechnical study, a water quality management plan, the grading plan, and the solar project design plan. (All studies and permit applications are listed in the Bibliography). Therefore, a comprehensive, sufficient and adequate CEQA analysis for the WPS Project was completed in multiple Final EIRs.

The District acknowledges that some additional review of site-specific projects may be required by CEQA to determine if there are site-specific significant impacts that are new or increased in severity that were not evaluated in the Final EIR (Section 4.0). (In this context, severity should be interpreted as the increase in severity of a significant and unavoidable environmental impact set forth in the Statement of Overriding Considerations). The District also acknowledges that a finding to that effect needs to be part of the Administrative Record. However, some public comments do not recognize the unique features of individual site-specific projects within an approved FMP and the relative contribution of project construction and operation in relationship to the total environmental impacts of buildout of the FMP. The key factor causing environmental effects for the campus is campus-related traffic, not building construction and operation. This situation differentiated private development in a City of a business park from campus development. (In CEQA traffic analysis for business parks, trips are based on square footage. In CEQA analysis for community colleges, trips are based on student enrollment).

For simplification, if a FMP included ten campus buildings totaling 500,000 gsf and an enrollment of 12,500 students, the majority of the particulate emissions for the FMP are related to the 12,500

students, because the vast majority of the students drive to campus and the vehicles generate mobile particulate emissions daily. The secondary contribution of emissions due to building construction is temporary, and only a small proportion of the total buildings square footage on campus is constructed annually. The emissions due to building operation are also a very small component of total campus annual or daily emissions (i.e. less than 1 percent).

In 2012 – 2015, only100, 696 GSF [Design Technology Center (62,837 GSF), Child Development Complex (33,807 GSF) and Emergency Operations Center (4,052 GSF)] of building construction was completed. Another 36,345 GSF [Food Services Building (13,459 GSF) and Student Success Center (22,886 GSF)] was under construction.

Returning to our initial premise that student enrollment and not building construction and operation on campus are the primary contributor of project impacts, consider the air quality emission projections in Table 3.2.8: 2012 Campus Peak Daily Operational Summer Emissions, Table 3.2.13: 2012 Facility Master Plan Buildout Operational Emissions Increase, and Table 3.2.15: Cumulative Construction Emissions (Fire Academy, Athletic Education Building and Parking Structure J) in the 2012 Final EIR. Focusing on the CO emissions as a major contributor to area and regional air quality, the analysis shows that the grading and earth movement for all four projects does not violate SCAQMD daily emissions thresholds of significance. The dominant contributor to CO emissions for the campus (Table 3.2.13) is almost exclusively mobile emissions. Mobile emissions are reduced by increasing public transit use, adding more efficient vehicles and production of clean energy. The District is actively involved in promoting public transit use (i.e. free Foothill Transit Agency bus passes for students), producing solar energy (i.e. the WPS Project) and lowering electrical use (i.e. the Thermal Energy Storage project).

The FTES increase due to the 2012 FMP resulted in 2025 summer operational peak CO emissions of 269 lbs./day. The existing 2012 campus summer operational peak CO emissions were 622 lbs./day. In both periods, mobile sources were the major contributor to CO emissions. Project construction CO emissions, assuming all four projected named above were constructed concurrently, was 180 lbs./day (unmitigated) and operational emissions were 119 lbs./day (Table 34.2.15). Grading is the prime contributor to construction emissions and square footage is used to project operational emissions. Therefore, it is reasonable, based on the evidence in the 2012 Final EIR, to conclude that the primary contributor to CO emissions is not the four site-specific projects (119 lbs./day), but mobile CO emissions (622 lbs./day) directly linked to student enrollment. Therefore, the 2012 Final EIR provides an adequate and sufficient evaluation of CO emissions, and identifies the mobile component (i.e. correlated directly with student enrollment) as vastly more important than the site-specific project component in generation of CO campus emissions.

C-6: Some citizens regard student enrollment increases and new construction on campus as undesirable. The District exists to serve students seeking to further their educational goals. The growth in enrollment on campus is the result of population growth, regional and area economic growth, and the students' desire for additional education. The development of new or renovated facilities on campus is not decided solely by the District. The primary factor used in projecting space needs for student facilities on campus is the weekly student contact hour (WSCH). WSCH is translated into full-time

equivalent (FTES) hours (i.e. one student enrolled in a 3-unit class spends 3 hours each week in the course classroom). The state (CCCCO) calculates WSCH for the semester and WSCH is stated as full-time equivalent students (FTES). The state then calculates the District's allowable assignable square footage (ASF) based on student enrollment, WSCH and FTES. ASF is the useable or assignable space within the building, as opposed to the gross square footage (GSF) of a building. The state focuses on five kinds of ASF: lecture, laboratory, office, library and AV/TV.

While the FTES and ASF projection methodologies may seem complex, it illustrates a larger truth: growth in campus facilities is regulated by the state and is a response to students pursuing their educational objectives by enrolling in campus courses. If the campus does not have sufficient building space, facilities are not available, classrooms become overcrowded, additional courses are not offered, and student progress and graduation rates decline.

State monies for community colleges or annual apportionments are also based on WSCH. While all community colleges receive a one percent increase in apportionment annually, the primary factor in allowable facility space on campus is WSCH and the projected WSCH based on trends over a period of years. Growth in campus enrollment is not a major contributor to area population, employment or housing growth. Therefore, student enrollment increases are not growth inducing and are not a significant environmental impact.

It should be noted that the total ASF per student for the District is fairly constant, with some fluctuation related to regional economic downturns and construction programs. (The ratio of ASF/FTES is approximately 39-51 from 2002-2012). Campus development takes time; only five projects (Design Technology Center, Child Development Complex, Emergency Operations Center, Building 12 Modernization and 21 Modulars) have been completed in the past four years. While new development and growth in student enrollment may raise citizen concerns for increased area traffic, most citizens regard college education as a desirable goal. Taxpayers have shown their support for education and campus construction by passing each District Bond Measure (Measure R in 2001 and Measure RR in 2008).

The remainder of Section 5.0 uses the topical environmental issues included in the CEQA Initial Study Checklist as the outline. The CEQA Checklist for the FMP was completed in July 2013 and is included as Appendix H in the Draft EIR. This preliminary evaluation of potential project environmental impacts was superseded by the analysis in the Final EIR.

In Section 3.10: Project Effects Found Not to Be Significant in the 2012 Final EIR, eleven impact issues were identified: (1) Aesthetics, (2) Area Traffic-Related Air Quality, (3) Area Traffic-Related Noise, (4) Geology/Soils, (5) Hazards and Contamination, (6) Hydrology/Flooding, (7) Public Services, (8) Public Utilities, (9) FMP Traffic at Build-out in 2025, (10) Socioeconomics, and (11) Transit/Medical Services.

Less than Significant Effects with Mitigation Incorporated for the FMP were identified in Table 1.3.1 in the Final EIR. These effects included land use, air quality, construction noise, greenhouse gases, biological resources, the fire training academy and public transit services.

Unavoidable adverse impacts of the FMP in Table 1.3.1 were for project impacts on historic resources. The Statement of Facts and Findings for the FMP also noted an unavoidable adverse impact for construction particulate emissions (PM_{10}) in the Localized Significance Thresholds Analysis (Table 3.2.14 in the Final EIR) at 50 meters for the WPS Project and noise and habitat impacts on coastal California gnatcatchers.

Several site-specific studies have been completed for the West Parcel for inclusion in the permit applications for Responsible Agencies. These studies are listed in the Bibliography and are available for public review at the Facilities Planning & Management Department. A second CEQA Checklist for the WPS, completed in September 2015, is included herein as an Attachment. It also is a summary of the potential environmental impacts of the project and includes references to new information prepared for Responsible Agencies for permit applications and available from site-specific plans for the WPS.

The topical issues in the CEQA Checklist that require additional analysis, based on the site-specific plans and studies are discussed in the following sections, which are organized alphabetically.

Aesthetics. The landforms on the West Parcel are not protected by any viewshed or ridgeline ordinance. Grand Avenue is also not a designated scenic highway corridor. Only views from public locations are significant view impacts under CEQA. View impacts to several private homes or facilities are not significant environmental impacts. The public viewshed analysis (Exhibit 4) indicates that the Project will not have any significant effect on area aesthetics. The proposed solar array in the current site plan (Exhibit 1) is located approximately 100 – 250 feet from the southerly edge of Grand Avenue and approximately 60 feet above Grand Avenue. The pad elevation has been lowered from 770 feet mean sea level ("msl") (Exhibit 14 in the Final EIR) to 761 feet msl, a reduction of 9 feet.

The solar array is located approximately 175 feet from the westerly site perimeter in the northwest and increases from 200 feet to over 500 feet from the westerly perimeter toward the southern perimeter. The solar array is about 50 feet from the southeast site perimeter. The westerly edge of the solar array is 30 – 40 feet below the elevation of the westerly site perimeter.

Therefore, the solar array pad elevation reduces the view exposure of the 10.3-acre solar array pad area from off-site views. Views of the 10.5 acres of natural and restored habitat will remain upon Project completion. Both the horizontal separation of the solar array from Grand Avenue and the westerly perimeter, and the vertical elevation separation limit the view of the solar array from off-site views. The cross-sections (Exhibit 2) indicate the elevation changes before and after development of the solar project.

The landscape plan for the Project (Exhibit 5) includes extensive landscaping along Grand Avenue and within the terrace areas along the western Project perimeter. As stated previously, 6,453 plants will be installed onsite and extensive acreage hydro-seeded with a Venturian coastal sage scrub mixture. The plant palette includes extensive use of plants that require low water usage. The planting plan must meet the requirements of the Responsible Agencies and will provide a natural screen to the Project.

PV solar panels are designed to absorb sunlight to convert it into electricity. The more sunlight that is absorbed, the more energy can be produced. A mono-crystalline silicon solar cell absorbs two-thirds of the sunlight reaching the panel's surface. This means that only one-third of the sunlight reaching the surface of a solar panel has a chance to be reflected.

An anti-reflective coating or glass can reduce the sunlight that is reflected and increase the amount of sunlight that is absorbed. Most solar panels are now designed with at least one anti-reflective layer and some panels have multiple layers.

The reflectivity of a surface varies with the type of material that covers it. If the solar panels have a reflectivity of around 30% - similar to the reflectivity of current site surface materials such as dry stand at 45%, needle-leaf coniferous trees at 20%, grass-type vegetation at 25% and broadleaf deciduous trees at 10% - the solar panels do not noticeably alter a site's current amount of reflected, indirect sunlight (Potential Impacts from the Reflection of Proposed Solar Panels: Proposed Solar Highway Site at West Linn, Oregon City, Oregon, www.goodcompany.com).

A public viewshed perspective prepared by HMC Architects (Build-out Solar Views) shows the views of the Project along Grand Avenue (Exhibit 4).

All of the views of the Project from the residential areas east of Grand Avenue in the Snow Creek development (south of the campus) are predominantly blocked by the view of MSAC Hill (Exhibit 4). Approximately 10.5 acres of the Project west of and above the solar array will be natural and restored habitat upon Project completion. Off-site views of the upper natural terrain from the east will remain unchanged.

The site-specific aesthetic impacts of the Project remain Less than Significant and do not create a new significant aesthetics impact or substantially exacerbate a significant environmental impact disclosed in the Final EIR.

Air Quality.

The assumptions used in the CalEEMod projections in the Final EIR were based on an import of 261,000 cubic yards and the Conceptual Grading Plan: Exhibit D-1 prepared by Psomas (Exhibit 14 in the Final EIR). CalEEMod does not specify cut and fill quantities as data inputs but uses data internally compiled from surveys of grading projects in the region in projecting particulate emissions from a project site. Only import quantities are entered independently in the model. The graded area for the Project has been reduced from 21.0 acres to 17.8 acres, a decrease of 15%. The import quantity for the Project has been reduced from 261,000 cubic yards in the Draft EIR (i.e. air quality analysis) to 163,571 cubic yards, a decrease of 37.3 percent.

The cumulative construction air quality analysis for four projects in the Final EIR remains a “worse case” analysis (Table 3.2.15) for grading operations. This analysis assumed all four projects (Athletic Education Building, Fire Training Academy, Parking Structure and West Parcel Solar/Retail) were being graded simultaneously. Moreover, the Parking Structure project is not proceeding simultaneously as originally

contemplated because of the preliminary injunction that halted the work on it. The changes in the Project do not increase the severity of cumulative air quality emissions from construction grading and no new cumulative air quality impacts have been identified.

The WPS Project does not exceed SCAQMD construction and operational thresholds of significance (West Parcel Solar Project – Air Quality Construction Analysis (Report #15-104C), Greve & Associates, LLC, September 9, 2015. The report's conclusions are summarized below and the full report is included in the Appendices.

Table 1: WPS Peak Construction Air Quality Particulate Emissions

	Pollutant Emissions (lbs./day)					
Activity	ROG	NOx	CO	SOx	PM10	PM2.5
Collection, Clear & Grub	1.7	17.9	13.7	0.0	7.9	4.3
Grading with Import	9.7	99.6	105.0	0.1	14.0	7.8
Final Grading	7.9	94.7	60.4	0.1	11.2	7.2
Solar Installation	0.3	3.0	2.6	0.0	0.3	0.2
Restoration	0.2	1.6	1.4	0.0	0.5	0.2
Landscaping	0.2	1.6	1.4	0.0	0.4	0.2
Solar Install + Restoration +Landscaping Subtotal	0.7	6.3	5.4	0.0	1.2	0.5
SCQAMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	No	No	No	No	No	No

Source: Table 3: West Parcel Solar Project – Air Quality Construction Analysis (Report #15-104C), Greve and Associates, August 30, 2015

The construction-related air quality particulate emissions due to the Project do not exceed SCAQMD Thresholds. Therefore, the Project has a Less than Significant Impact on local air quality. These conclusions are predicated on the following two assumptions: (1) The grading with import phase includes use of three scrapers, one loader, one dozer and one compactor and (2) The final grading phase includes four scrapers, one dozer and one compactor.

Table 2 evaluated the Project in relationship to the SCAQMD Localized Significance Thresholds (LST) requirements. This is a special analysis that estimated air quality emissions on residential areas nearest the Project.

Table 2: WPS On-Site Air Quality Particulate Emissions By Construction Activity

Activity	Daily Emissions (lbs./day) NOx	CO	PM10	PM2.5
Collection, Clear & Grub	17.8	13.4	7.9	4.3
Grading with Import[1]	77.0	50.6	6.3	4.7
Final Grading[1]	94.6	59.5	7.2	5.3
Solar Installation	2.8	2.1	0.2	0.2
Restoration	1.6	1.2	0.4	0.1
Landscaping	1.6	1.2	0.4	0.1
Solar Install + Restoration +Landscaping Subtotal	6.1	4.5	1.1	0.5
LST Thresholds	*236*	*1,566*	*12*	*7*
Exceed Threshold?	No	No	No	No

Source: Table 4: West Parcel Solar Project – Air Quality Construction Analysis (Report #15-104C), Greve and Associates, September 9, 2015.

1: Particulate emissions resulting with watering the grading area at least twice a day, as required by Mitigation Measure 3h in the 2012 Mitigation Monitoring Program.

The construction-related air quality particulate emissions due to the Project do not exceed SCAQMD Localized Significance Thresholds (LST) methodology. Therefore, the Project still has a Less than Significant Impact on local air quality and on the adjacent offsite residences.

While particulate matter from diesel-engines is classified as a toxic air contaminant by the California Air Resources Board, impacts on humans is related to cumulative exposure and assess over a 70-year period. Use of diesel equipment onsite for the WPS Project occurs over a nine-month period. Therefore, diesel emissions have no impact on adjacent residents or onsite construction employees.

The 2012 Final EIR site plan has only the northerly access driveway, which will be used by service vehicles only after build-out. The increase in solar array pad area is achieved by lowering the pad

elevation and reducing the slope along Grand Avenue. The perimeter of the natural habitat that is not graded along the interior (i.e. westerly) site perimeter has not changed. Therefore, grading is not occurring closer to off-site residences.

The solar array pad area has increased slightly in acreage but additional stepped terracing is created for restoration landscaping along the natural terrain interface toward the westerly Project perimeter. Considering that both the soil import cubic yards and duration of grading remain unchanged, the changes in the grading plan are not substantial and the existing air quality analysis is sufficient for the Project.

Biological Resources. Additional more comprehensive biological resource studies for the Project have resulted in differing acreages for Project impacts on biological resources. As summarized in the May 29, 2015 Helix biological report:

Earthwork for this project will impact 17.22 acres of land, including 8.07 acres of CSS, 0.29 acre of disturbed CSS, 8.78 acres of agricultural land, 0.06 acre of mule fat scrub, and 0.02 acre of developed areas.

The changes in acreage of the solar project impacts on coastal sage scrub is less than that evaluated in the Final EIR and the change is not significant.

The mitigation measures imposed for the Project impacts on biological resources now include the following:

The total obligation of the project is 17.04 acres. This will be done through a combination of 8.68 acres of preservation and 8.36 acres of restoration. The proposed 8.04 acres of CSS restoration (Table 1) will occur on the Mt. SAC campus in portions of the area to be disturbed by grading for the solar power generation station, and in agricultural areas on the West Parcel and in the Expanded Wildlife Sanctuary (Figure 3). The proposed 0.32 acre of riparian restoration will occur along Snow Creek on the Mt. SAC campus in areas previously disturbed by grazing (Figure 3).

The Final EIR includes mitigation measures to identify replacement habitat for Project impacts on coastal sage scrub habitat. The site-specific biological update report (West Parcel Solar Project at Mt. San Antonio College Biological Technical Report, Helix Environmental Planning, Inc., May 29, 2015) fulfills that requirement and the update will be reviewed by the Responsible Agencies. With Agency approvals, the Project will not create a new significant impact on gnatcatcher's habitat or exacerbate the impacts on gnatcatcher's habitat.

The Final EIR also requires the District to initiate a formal Section 7 Consultation with the United States Fish and Wildlife Service for "incidental" taking of a threatened species (i.e. coastal California gnatcatchers). This consultation is part of the United States Army Corps of Engineers (USACE) 404 Nationwide Permit Application. A revised 404 Permit Application for the Project, per initial consultation with the USACE, was resubmitted on June 2, 2015. The application is pending.

The initial biological resources studies classified 9.5 acres of the habitat onsite as non-native grassland. However, subsequent studies indicated the grassland was degraded from grazing and it was classified as

agricultural. Habitat for the cactus wren is included in the current biological mitigation plan by providing for cactus thickets in the coastal sage scrub restoration and replacement areas. Coast prickly pear (*Opuntia littoralis*) pads will be salvaged onsite and become a replacement habitat for the cactus wren. Mitigation Measure 9c in the 2012 Final Mitigation Monitoring Program is fulfilled by implementing the mitigation measures included in West Parcel Solar Project at Mt. San Antonio College Biological Technical Report, Helix Environmental Planning, Inc., May 29, 2015.

The Project's unavoidable impact on coastal California gnatcatchers was identified in the Final EIR and the site-specific changes in the site plan have not exacerbated the Project impact. Except for the unavoidable adverse impacts on coastal California gnatcatchers, the Project impacts on biological resources remain Less than Significant with Mitigation Incorporated. In spite of limited grading and construction during the coastal California gnatcatcher breeding season, and providing replacement and restoration habitat for the birds, some bird mortality may be expected. For this reason, the Project impact on coastal California gnatcatchers remains unavoidable adverse. This situation is not a new Project impact or an exacerbation of the unavoidable adverse impact. Thus, the Project does not create a new significant biological resources impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Cultural Resources. College master plan impacts on cultural resources were addressed in response to comments from the Native American Heritage Commission (June 9, 2008) in the 2008 Master Plan Update Final EIR. Mitigation Measure 6b in the 2012 Final Mitigation Monitoring Program also addresses discovery of a new paleontological find during grading. The remains of a historic cattle chute on the West Parcel in a site-specific survey were identified and evaluated but are not a significant cultural resource (Phase I Cultural Resource Survey for the West Parcel Solar Project, Walnut, Los Angeles County, California, Applied EarthWorks, Inc., December 2014). Thus, the Project does not create a new significant cultural resources impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Geology/Soils. The geology/soils of the West Parcel were investigated using twenty-one boring locations. Some fill materials are present onsite and localized perched groundwater will be encountered onsite. The study concludes development may occur without significant effects with standard engineering practices (Geotechnical Study Report: Proposed Fill Placement at the West Parcel, Mount San Antonio College, Walnut, California, Converse Consultants, December 19, 2014).

The current grading plan for the project (Tilden Coil Contractors, Matt Breyer, November 12, 2014) projects 172,708 cubic yards of cut, 336,279 cubic yards of fill and 163,571 cubic yards of fill (i.e. import).

Mitigation Measures 2a and 2c in the 2012 Mitigation Monitoring Program specify requirements for earth hauling plans.

The amount of earth import has declined substantially (37.3 percent) from the 261,000 cubic yards estimate used in the Final EIR. No new significant Project effects on geology/soils have been identified and the severity of the impacts has not increased. The site-specific impacts of the Project on geology/soils remain Less than Significant with Mitigation Incorporated. Thus, the Project does not

create a new significant geology or soils impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Greenhouse Gases. The SCAQMD has not officially adopted significance thresholds for greenhouse gas emissions. However, their draft studies recommend use of a 3,500 MT CO_2EQ/yr threshold for residential projects, a 1,400 MT CO_2EQ/yr (metric ton of equivalent carbon dioxide per year) threshold for commercial projects, and a 3,000 MT CO_2 EQ/yr for mixed-use projects. This Project does not fall into any of these categories. Construction emissions are amortized over the life of the project, defined by SCAQMD as 30 years, and are added to the annual operation emissions.

The greenhouse gas emissions for construction of the Project are estimated as 25 MT CO_2 EQ/yr. Therefore, the Project has no significant greenhouse gas emission impacts. Additionally, the operation of the Project is designed to reduce energy consumption and as a consequence reduce greenhouse gas emissions. Therefore, the Project will not have a significant impact on greenhouse gas emissions.

Hazards and Hazardous Materials. Prior mitigation measures first adopted in 2008 for potential hazards on campus (i.e. asbestos, contaminated soils) are retained in the 2012 Mitigation Monitoring Program. Bid 3005 requires the completion of a Demolition Waste Management Plan. Since there are no structures onsite, the plan will focus on removal of non-hazardous vegetation during grading. No hazardous materials are associated with the operation and maintenance of the solar arrays. Thus, the Project does not create new significant hazards or hazardous materials impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Hydrology/Water Quality. Mitigation Measures 7a – 7c in the 2012 Mitigation Monitoring Program require updating of the Master Campus Drainage plans for a site specific project. A draft drainage and water quality study has been completed for the Project site and submitted to the Responsible Agencies for approval. Psomas has completed a draft water quality study for the Project that assures all Project drainage and water quality issues are addressed (Draft Project Specific Water Quality Management Plan for Mt. SAC South Camus Improvements: West Parcel, Psomas, July 2, 2015). All drainage and water quality Project impacts, due to compliance with the requirements of the Psomas study and any additional requirements by Responsible Agencies, will be Less than Significant. No new significant effects will occur with compliance with the approved studies for responsible agencies.

Bid 3005 also requires the contractors to comply with an approved Storm Water Pollution Prevention Plan. Thus, the Project does not create a new significant hydrology or water quality impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Land Use. The Project is proposed in the Solar & Retail District of the FMP. The Project is also in substantial conformity with the FMP, as required by Mitigation Measure 1a in the 2012 Mitigation Monitoring Program. The existing land uses onsite and land uses in the immediate surrounding area have not changed. The Project will comply with all requirements of the Responsible Agencies for habitat conservation plans. The District will also obtain all required permits needed for the Project from the City of Walnut. Since the interconnect conduit will be installed by boring under Temple Avenue and Grand

Avenue, there are no traffic impacts on these two streets. Thus, the Project does not create a new significant land use impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Noise.

The dominant source of noise within and near the campus is traffic-related noise. Area traffic-related noise for the FMP was adequately addressed in the prior CEQA documentation for master plan updates. Item 10 in Section 3.10 of the Final EIR indicated that noise analysis for area traffic-related noise in the 2008 final EIR was adequate for the FMP because trip volumes on area roadways were projected to be less than previously analyzed. The area traffic-related noise impact was Less than Significant and the construction and operational noise impacts of FMP projects were Less than Significant with Mitigation Incorporated.

Construction contracts may specify that only handheld radios be used onsite. However, the dominant noise sources for the Project will remain construction equipment noise. Construction operations will be limited, except for emergencies or special circumstances, to the hours of 7am to 7pm Monday through Saturday (Mitigation Measure 5a in the 2012 FMP Mitigation Monitoring Program). Hauling of earth materials is restricted to 9 am to 2 pm weekdays and 8am to 5pm Saturdays to avoid peak hour traffic (Mitigation Measure 2c in the 2012 FMP Mitigation Monitoring Program). Construction grading for the West Parcel during the prime bird nesting season, generally between February and September 15, is prohibited by the United States Fish and Wildlife Service. The Project must comply with permit conditions and with Mitigation Measure 21i in the 2012 FMP Mitigation Monitoring Program. Thus, the Project does not create a new significant noise impact or exacerbate a significant environmental impact disclosed in the Final EIR.

The District is not subject to the City's Noise Ordinance or noise standards. Per California Government Code 53091(e): Water and electrical energy facilities: "Zoning ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, or for the production or generation of electrical energy, facilities that are subject to Section 12808.5 of the Public Utilities Code, or electrical substations in an electrical transmission system that receives electricity at less than 100,000 volts. Zoning ordinances of a county or city shall apply to the location or construction of facilities for the storage or transmission of electrical energy by a local agency, if the zoning ordinances make provision for those facilities."

The Project will not have a significant noise impact upon buildout. Only sporadic maintenance is needed for the solar project and no heavy equipment that generates noise is required. Therefore, the Project(s) has no noise impact after buildout.

Onsite ambient noise monitoring was completed on August 17, 2015 for two residences near the Project: 1131 Regal Canyon Drive and 21107 Stonybrook Drive. The average noise level (Leq) was 46.9 DBA and 51.8 DBA respectively.

Table 3 presents projected noise levels at distances of 50, 200 and 500 feet from residences. The noise levels projected for 50 feet would be representative of equipment working on slopes close to the

residents. Often, the equipment onsite will be located around 200 feet from the residences when the pad areas are being constructed or solar panels are being installed. A distance of 500 feet from residences is the distance to the center of the building pad. The shortest distance represents the worst-case projections for short periods of time.

The Project will have a substantial, but temporary, increase in ambient noise levels in the project vicinity above ambient noise levels during some phases of construction (i.e. grading) depending on the distance from the sensitive receptors, the type of construction equipment being used, and the noise volume generated by that equipment. The temporary increase above ambient noise levels is more pronounced outside of peak periods when background traffic noise is less. Therefore, the most effective means of reducing temporary noise impacts during construction is to minimize the time construction occurs (i.e. complete it quickly to limit the noise duration or limit the hours of construction). The following mitigation measure (included as MM 5a in the 2012 Mitigation Monitoring Program for the certified 2012 Final EIR (SCH 2002041161) is feasible and effective in reducing Project construction noise from significant to Less than Significant with Mitigation Incorporated.

Under MM 5a, all construction and general maintenance activities, except in emergencies or special circumstances, shall be limited to the hours of 7 am to 7 pm Monday-Saturday. Staging areas for construction shall be located away from existing offsite residences. All construction equipment shall use properly operating mufflers. These requirements shall be included in construction contracts and implemented. Facilities Planning & Management shall monitor compliance.

Table 3: Construction Noise Levels

	Site Prep	Grading with Fill Import	Finish Grading	Solar Install/ Restoration/ Landscape
At 50 feet from Residences				
Maximum Levels at Residence (Lmax dBA)	97	97	97	97
Average Noise at Residence (dBA Leq)	86	94	93	85
At 200 feet from Residences				
Maximum Levels at Residence (Lmax dBA)	85	85	85	85
Average Noise at Residence (dBA Leq)	74	82	81	73
At 500 feet from Residences				
Maximum Levels at Residence (Lmax dBA)	77	77	77	77
Average Noise at Residence (dBA Leq)	66	74	73	65

Source: Table 2: West Parcel Solar Project – Construction Noise Analysis (Report #15-104D), Greve & Associates, LLC, September 9, 2015.

The maximum noise levels (Lmax) at the nearest residential land use may reach up to 97 dBA for short periods of time. (This is at the northwest corner of the project site and primarily effects four residences offsite). These noise levels will be considered loud by residents living adjacent to the property. Maximum noise levels will occur when the grading equipment is at full power, and will be considerably less when grading equipment is at 200 feet from the residences.

Public Services. The Project has no impact on governmental facilities and does not cause significant impacts to maintain acceptable service ratios. The campus will provide both security and fire protection to the Project. No schools, parks or other public facilities are associated with the Project. Therefore, no impact occurs on public services.

The Project does not require sewer or wastewater services. Water will be required to establish the replacement habitat onsite and for landscaping. However, the water demand upon build-out, due to the small acreage involved, will be Less than Significant.

Socioeconomics. The Project does not include any housing. The Project is small and will not induce any housing or population growth within the City. Therefore, no impact occurs for this issue.

Traffic. The Project will have no significant effect on area traffic since the only vehicles associated with the Project are construction traffic and maintenance vehicles. Thus, the Project does not create a new significant traffic impact or exacerbate a significant environmental impact disclosed in the Final EIR.

Transit/Medical Services. The Project does not include any housing. Therefore, only construction employees or solar service/maintenance personnel may use transit or medical services. The number of construction employees will be small and have no permanent impact on transit or medical services. Therefore, no impact occurs for this issue.

Mandatory Findings of Significance. The Project does not have impacts that are individually limited, but cumulatively considerable. No additional new, past, present, or future projects have been identified that contribute to the effects of the Project.

6.0 Conclusions for Adequacy of the Existing CEQA Documentation

(1) There are no new significant effects that were not analyzed in the certified Final EIR.

While there are new characteristics of the Project that were not known when the Final EIR was certified, this information does not constitute significant effects. The new environmental or Project design and operation information generally relate to the additional analysis completed for permits required by Responsible Agencies, or required for the bid process.

The acreage for coastal sage scrub and non-native grassland onsite in the Final EIR is similar to the latest biological resource permit estimates, with 8.7 acres previously and 8.07 acres currently. The Final EIR did not identify the replacement areas for coastal sage scrub within MSAC Hill or along Snow Creek but specified the replacement ratios. These are indirect effects of implementation of the Project and are not significant effects.

There are no major differences in the Preliminary Grading Plan – Solar Pad (Exhibit 14 in the Final EIR) and the current Grading Plan (Exhibit 1). The pad area on both plans is 10.6 acres. Exhibit 14 in the Final EIR did not identify the solar array area within the graded pad. However, the amount of earth imported (i.e. fill) has been reduced from 261,000 cubic yards to 169,044 cubic yards, a 37.3-percent reduction.

The terracing along the perimeter of the westerly graded area was recommended by the biologist to establish the best environment for growth and viability of the replacement coastal sage scrub habitat onsite.

The solar pad area elevation has been lowered from 770 to 761 feet msl for the Project, a reduction of nine feet.

No new adverse effects of the site-specific project that would cause substantial new adverse effects on human beings have been identified. Therefore, there is no Mandatory Finding of Significance.

There is no evidence that the Project will cause new significant effects that were not analyzed in the Final EIR. Therefore, no additional CEQA documentation is required and the existing CEQA documentation is adequate and sufficient for the Project.

(2) There are no substantial increases in the severity of previously identified significant effects identified in the certified Final EIR.

The significant effects identified for the Project in the Final EIR was a potential impact on the coastal California gnatcatcher. The gnatcatcher is considered a Species of Concern by the California Department of Fish and Wildlife and is listed as threatened by the U. S. Fish and Wildlife Service.

The significant effect on coastal sage scrub habitat of the coastal California gnatcatcher has not increased in severity. The acreage indicated in the Final EIR for coastal sage scrub was 8.7 acres and is now estimated at 8.28 acres. The key issue is the magnitude and quality of the habitat that supports the threatened coastal California gnatcatcher, and both of these are maintained to the highest level. There is no increase in severity of impact at Project build-out on coastal sage scrub habitat.

However, the severity of the impacts on the coastal California gnatcatcher is not solely related to habitat but is also related to the numerical number of birds onsite, which may increase or decrease during each survey. In spite of limited grading and construction during the coastal California gnatcatcher breeding season, and providing replacement and restoration habitat for the birds, some bird mortality may be expected. For this reason, the Project impact on coastal California gnatcatchers remains unavoidable adverse. However, the District's obligation for providing mitigation for either incidental take, or habitat destruction, is acceptable to the Responsible Agencies when the requirements of their permits are fulfilled. The changes in the Project, as described in the Final EIR and herein, upon the coastal California gnatcatcher are not new significant impacts and are not exacerbated by the changes in the Project.

The Project impact on construction and operational emissions has not increased in severity and remains Less than Significant. The amount of earth hauling declined by 261,000 cy to 163,571 cy from the Final EIR to the site-specific analysis.

(3) Are there mitigation measures or alternatives that were not considered in the previous EIR and should have been considered?

The District) has not declined to adopt relevant effective mitigation measures or alternatives. The installation of sound walls along the project perimeter is not effective in reducing noise substantially. There are no feasible alternatives that need to be considered.

Therefore, in conclusion, with the restrictions on construction to non-holiday Monday to Friday, there is no evidence that the Project will cause a new significant environmental effect or increase the severity of previously identified significant effects identified in the Final EIR. Therefore, no additional CEQA documentation is required and the 2012 Final EIR is adequate and sufficient for the Project.

7.0 Bibliography (Project Applications and New Technical Studies Completed for Permit Applications to Responsible Agencies) and/or Actions to Comply with the 2012 Final Mitigation Monitoring Program

All documents listed in the Bibliography are available for public review by contacting Mikaela Klein, Facilities Planning & Management at (909) 274-5720 or at mikaela.klein@mtsac.edu.

Request for Statement of Qualifications and Request for Detailed Proposal for the Assessment, Design, Installation, and Operation and Maintenance of Photovoltaic System, RFQ/RFP No. 3005, Mt. San Antonio College, April 2015

Addendum 1 – 3 to Bid 3005, Mt. San Antonio College, April 2015

West Parcel Solar Project at Mt. San Antonio College Habitat Mitigation Plan, Helix Environmental Planning, Inc., May 30, 2015

West Parcel Solar Project at Mt. San Antonio College Biological Technical Report, Helix Environmental Planning, Inc., May 29, 2015

Year 2012 Coastal California Gnatcatcher Survey Report for the Mt. San Antonio College Project, Helix Environmental Planning, December 21, 2012

Section 401 Water Quality Certification Application Form, California Water Boards, Los Angeles Regional Water Quality Control Board, June 2, 2015

State of California Department of Fish and Wildlife Notification of Lake or Streambed Alternation, June 2, 2015

Preliminary Jurisdictional Determination Form, June 2, 2015

U. S. Army Corps of Engineers South Pacific Division, Nationwide Permit Pre-Construction Notification (PCN) Form, June 2, 2015

Phase I Cultural Resource Survey for the West Parcel Solar Project, Walnut, Los Angeles County, California, Applied EarthWorks, Inc., December 2014

Geotechnical Study Report: Proposed Fill Placement at the West Parcel, Mount San Antonio College, Walnut, California, Converse Consultants, December 19, 2014

Mt. San Antonio College Grand Avenue Parcel Earthwork Exhibit D-5 (Draft Concept), Psomas, November 4, 2013

Draft Project Specific Water Quality Management Plan for Mt. SAC South Campus Improvements: West Parcel, Psomas, July 2, 2015

City of Walnut Zoning Map, Updated September 2012

Ambient Noise Measurements (Report #15-104B), Greve & Associates, LLC, August 23, 2015.

West Parcel Solar Project – Air Quality Construction Analysis (Report #15-104C), Greve & Associates, LLC, September 9, 2015.

West Parcel Solar Project – Construction Noise Analysis (Report #15-104D), Greve & Associates, LLC, September 9, 2015).

8.0 Attachments

Exhibit 1: Site Plan and Approximate Location of Boring, Converse Consultants, July 2014, (West Parcel)

Exhibit 2: Cross Section A-A", B-B", C-C", D-D," Converse Consultants, July 2014, (West Parcel)

Exhibit 3: Mt. San Antonio Grand Avenue Parcel Earthwork Exhibit D-5, Option D-5, Psomas, November 4, 2013

Exhibit 4: Viewshed Simulation Photo 2 (HMC Architects, January 2014)

Exhibit 5: Overall Planting Plan (EPT Design, July 7, 2015)