

P.O. Box 682, Walnut, CA 91788-0682
21201 La Puente Road
Walnut, CA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095
www.cityofwalnut.org



Mayor, Nancy Tragarz
Mayor Pro Tem, Andrew Rodriguez
Council Member, Eric Ching
Council Member, Robert Pacheco
Council Member, Mary Su

CITY OF WALNUT

October 3, 2018

VIA EMAIL & USPS

Gary Nellesen, Director - Facilities Planning & Management
Facilities Planning & Management Division
Mt. San Antonio College
1100 N. Grand Avenue
Walnut, California 91789-1399
facilitiesplanning@mtsac.edu

SUBJECT: Comments on the Notice of Preparation Long Range Development Plan - Mt. San Antonio College 2018 Educational and Facilities Master Plan

Dear Mr. Nellesen,

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) Long Range Development Plan (LRDP) Draft EIR for the Mt. SAC 2018 Educational Facilities Master Plan (EFMP), and attend the September 19, 2018 EIR Scoping Meeting.

Attached are the City's comments for your review and reference. Should you wish to discuss our comments further or have any questions, please contact the Community Development Department (909) 595-7543 ext. 400 or email dwomble@cityofwalnut.org.

Thank you for your consideration!

Respectfully,

Derrick Womble
Senior Management Analyst

Attachment(s):

1. City of Walnut – Comments on the Mt. SAC NOP LRDP Draft EIR 2018 EFMP

cc: Tom Weiner, Assistant City Manager – Development Services
Barbara Leibold, City Attorney
Teresa De Dios, City Clerk

COMMENTS ON NOTICE OF PREPARATION FOR LONG RANGE DEVELOPMENT PLAN MT. SAN ANTONIO COLLEGE 2018 EDUCATIONAL AND FACILITIES MASTER PLAN

General Comments

EIR Approach. The approach to the 2018 Educational and Facilities Master Plan (EFMP) EIR described in the Notice of Preparation (NOP) and presented at the September 19, 2018 EIR Scoping Meeting presents an opportunity for Mt. SAC to establish a stable 2018 environmental baseline for evaluation of near-term and long-range Mt. SAC development program impacts through 2027 (10-year planning and development horizon).

A 'stand-alone' EIR is proposed that would not rely upon use of tiering (CEQA 15152) with subsequent CEQA documents for development activities through 2027.

The NOP describes a logical approach to addressing the project and cumulative impacts of the Long-Range Development Plan and EFMP that is consistent with CEQA requirements for a Program EIR (Sec. 15168).

Specific Comments

Content of NOP. The District's Notice of Preparation (NOP) includes the required contents for an NOP pursuant to CEQA 15082(a). There is no Initial Study attached with the NOP.

2018 Memorandum of Agreement. The NOP briefly mentions the April 12, 2018 Memorandum of Agreement ('Agreement') between the City of Walnut (City) and Mt. SAC in relation to the West Parcel Site Improvement project and Physical Education Project (PEP Phase 1, 2). The EFMP EIR should describe the authority and responsibilities of Mt. SAC and the City of Walnut under the Agreement. There should be explicit recognition in the EIR of the City's grading/drainage plan administrative review and permit authority, as well as other terms of the Agreement regarding notification and consultation for future projects.

West Parcel Site. The NOP indicates that the EFMP addresses the previously approved "West Parcel Site Improvement Project". The West Parcel site is identified on the 2018 EFMP Map, but no projects for the site are identified in the near term (2018-2027) or long-term (post-2027). Pursuant to the Agreement, there is no specific project for this site other than West Parcel "earthwork". A copy of the Agreement should be included in the EIR. Any near-term (2018-2027) or long-term (post-2027) use alternatives that may be proposed by Mt. SAC or the City for this site should be identified and evaluated in the EIR.

Physical Education Complex. The NOP indicates the EFMP addresses the previously approved Physical Education Complex (PEC) (PEP Phase 2). The PEC site is identified on the 2018 EFMP Map as a Major New Building. The construction and operation of the PEC will overlap with other major projects listed in the NOP for the 2018-2027 timeframe. The construction and operational effects of the PEC combined with other major projects proposed during this time frame should be evaluated in the EIR.

New Projects in Phases 1A, 1B and 2 (2018-2027). The NOP indicates that the following planned facilities for Phases 1A, 1B and 2 of the EFMP will be evaluated at a *project-specific level* in the current EIR:

Student Center and Central Campus Infrastructure; Bookstore; Parking Structure R and Tennis Courts; Parking Structure S; Sand Volleyball Courts; Replacement Communication Tower.

Parking Structures. The Agreement specifies that any parking structure shall maintain a setback of no less than 400 feet from the nearest residential property line and that Mt. SAC will meet and confer with the City to evaluate potential impacts of the parking project on nearby residents. In this regard, we note that Parking Structures R, S and F are proposed near the planned Transit Center and approved Physical Education Complex in a more central location within the campus than the previously proposed peripheral Parking Structure at Lot A along Edinger Way near residential properties. These locations are in conformance with the Parking Structure provisions of the Agreement. We further note that neither Structure B proposed at Grand Avenue and San Jose Hills Road, nor Structure F proposed near the proposed Transit Center are identified as projects within the 2018-2027 timeframe.

It appears that construction activities for Structures R and S may overlap with earthwork construction on the West Parcel Site, Transit Center, and the Physical Education Projects during the 2018-2027 timeframe. Phasing of these projects should be identified. The traffic circulation impacts of construction and operations of these structures in combination with other New Major Buildings must be evaluated in the EFMP EIR and associated 2017 Parking and Circulation Master Plan. Mitigation for potentially significant impacts on Temple Avenue, Bonita Avenue, Grand Avenue, and Valley Boulevard, and other City roadways should be included in the EIR.

Any potential visual impacts of proposed rooftop tennis courts with lighting on Structure R, and potential rooftop solar panels on 4-level Structure S, should be addressed in the EIR.

Replacement Communication Tower. The Proposed Replacement Communication Tower would replace the existing 40 ft. high communications tower on Reservoir Hill with an approximately 100-ft. high tower to provide enhanced emergency operations and response capabilities. The project-level review of this structure should include a visual analysis from surrounding vantage points.

Open Space. There are substantial areas shown in green on the 2018 Facilities Master Plan that serve different open space purposes (e.g. wildlife preserve, buffer, passive and active recreation, and West Parcel.) Consideration should be given to including an Open Space designation on the EFMP legend that encompasses these areas.

Cumulative Impacts

Consistent with CEQA Section 15168 (Program EIR) and the LRDP mandate to take a long-range view, any known projects contemplated under Phase 3 of the LRDP (post-2027) should be identified in the current EIR. The type of cumulative impacts that will result from future projects should be addressed in the current EIR, and the timing and type of CEQA documentation to support future project approvals should be described.

Alternatives

The NOP fails to identify any Alternatives to the proposed EFMP for evaluation in the EIR. It was indicated at the NOP Scoping Meeting that the Medium and High Growth Scenarios in the EFMP would be addressed in the EIR. The facility requirements for these scenarios, and resulting environmental impacts and mitigation measures, should be clearly addressed in the EIR.