Final Supplemental Environmental Impact Report 3 for

Evaluating Relocation of the San Dimas Station Parking Facility

FOOTHILL EXTENSION

Azusa to Montclair (SCH No. 2010121069)

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July 2022

APPENDIX A: ATTACHMENT C – SUMMARY OF SECONDARY EFFECTS MEMORANDUM



Metro Gold Line Foothill Extension Construction Authority

1 Introduction

1.1 Background

The Final SEIR 3 for the Metro Gold Line Foothill Extension – Phase 2B from Azusa to Montclair Project has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Section [§] 21000 et seq.) and the Guidelines for Implementation of the CEQA (California Code of Regulations [CCR], Title 14, §15000 et seq.).

PRC §21166 states that once an environmental impact report (EIR) has been prepared for a project, no subsequent or supplemental EIR is to be prepared unless one of the following circumstances occurs:

- a) Substantial changes are proposed in the project that will require major revision to the EIR.
- b) Substantial changes have occurred with respect to the circumstances under which the project is being undertaken, which will require major revisions to the EIR.
- c) New information, which was not known and could not have been known at the time the EIR was certified as complete, has become available.

The Final SEIR 3 has been prepared due to the need for revisions to SEIR 2 as a result of the Project Modifications. The Final SEIR 3 compares the potential effects of the Project Modifications to the effects of the Project as evaluated in the 2013 FEIR and subsequent environmental actions, and as currently approved by the Construction Authority Board.

1.2 Purpose of the Supplemental Environmental Impact Report 3 (SEIR 3)

On June 17, 2021, the City of San Dimas in cooperation with the Construction Authority approved a binding letter of intent to relocate the San Dimas Station parking facility. Parking for the San Dimas Station would be relocated from the currently approved location, which was studied in SEIR 2 and prior analyses, to a new location south of the project ROW between Monte Vista Avenue and San Dimas Avenue. No modifications are proposed for the parking facilities at the Glendora, La Verne, Pomona, Claremont, or Montclair Stations. In response to these proposed changes, the Construction Authority prepared the SEIR 3 to evaluate the potential for significant impacts that may result from the proposed changes at the San Dimas Station parking facility. The potential reconfiguration of parking at the San Dimas Station as described in the Final SEIR 3 is referred to as the "Project Modifications."

The Final SEIR 3 evaluates the environmental effects of the potential Project Modifications as compared to the Project approved by the Construction Authority and described in the 2013 FEIR and subsequent environmental actions (but not including the TPSS/LADWP refinement described in Addendum No. 3 and Modifications No. 6 and No. 7 described in Addendum No. 4). Like the 2013 FEIR and subsequent environmental actions, the Final SEIR 3 is intended to provide information to the public, the Construction Authority Board, and responsible and trustee

agencies regarding the potential significant environmental impacts of the Project Modifications and to identify measures to reduce or eliminate any significant impacts.

1.3 Purpose of this Memorandum

Following the publication of the Draft SEIR 3, stakeholder feedback was received that inquired on several secondary effects of the proposed Project Modifications analyzed in SEIR 3. This Secondary Effects Summary Memorandum was prepared to provide a consolidated set of analysis to address stakeholder comments received on the Draft SEIR 3 of the Metro Gold Line Foothill Extension – Phase 2B from Azusa to Montclair Project (Project). The purpose of this memo is to respond to stakeholder concerns received on the Draft SEIR 3 and provide clarifications on the proposed Project Modifications presented in the Draft SEIR 3.

1.4 CEQA Guidelines

1.4.1 VMT

The California Resources Agency determined that, in general, transportation impacts are best evaluated by using vehicle miles traveled (VMT). Guidelines §15064.3 requires that lead agencies should presume that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, would have a less than significant impact. The Resources Agency also determined "Lead agencies have the discretion to choose the most appropriate methodology to analyze a project's vehicle miles traveled."

However, given that the publication of this document follows the July 1, 2020, date on which CEQA Guidelines §15064.3 and SB 743 became applicable, this Final SEIR 3 applies VMT as the determining factor for CEQA impacts and does not consider traffic delay to be an environmental impact under CEQA.

Although no longer required as part of CEQA analysis, ridership, traffic operations, and potential parking impacts are described in Section 3.2 of the Final SEIR 3 for informational purposes, and for comparison to the prior environmental analyses. Detailed assumptions and analyses are provided in Appendix A (Transportation Technical Memorandum).

1.4.2 Transit, Pedestrian and Bicycle

Evaluation of the Project Modifications' transportation impacts on Transit, Pedestrian and Bicycle resources uses the same evaluation criteria as described in the 2013 FEIR and subsequent environmental actions. Appendix G of CEQA Guidelines identifies transportation impacts as significant if the Project Modifications would:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

• Result in inadequate emergency access.

1.4.3 Traffic

Subsequent to the certification of the 2013 FEIR, the California Legislature adopted amendments to CEQA (PRC §21099) directing the Office of Planning and Research to develop and adopt amendments to the CEQA Guidelines using alternative measures for transportation impacts. In December 2018, the Resources Agency of the State of California adopted a new section of the CEQA Guidelines (CEQA Guidelines §15064.3) that states level of service (LOS) and similar measurements of traffic delay "will no longer be considered to be an environmental impact under CEQA" (California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines, OAL Notice File No. Z-2018-0116-12, p. 15 ["Final Statement of Reasons"]). However, the Resources Agency authorized lead agencies to "elect to be governed by the provisions of this section immediately" and said the new measure of transportation impacts required by §15064.4 will apply statewide beginning on July 1, 2020.

The 2013 FEIR and subsequent environmental actions conducted traffic LOS analysis based on delay because the studies were conducted prior to the application of CEQA Guidelines §15064.3 and SB 743. It is common practice for an SEIR to include the same transportation analysis as the FEIR that precedes it in order to ensure consistency in comparison and control for changes resulting from only the project modifications. Consequently, the Final SEIR 3 includes a supplementary traffic LOS analysis for the purpose of comparison to previous analysis and informing the public and decision makers of potential impacts. The inclusion of the supplementary traffic LOS analysis is for information purposes only and, consistent with CEQA Guidelines § 15063.4 and SB 743, is not part of the CEQA impact determination.

1.4.4 Parking

The 2013 FEIR and subsequent environmental actions conducted parking analysis as the studies were conducted prior to the application of CEQA Guidelines §15064.3 and SB 743. It is common practice for an SEIR to include the same transportation analysis as the FEIR that precedes it in order to ensure consistency in comparison and control for changes resulting from only the project modifications. Consequently, the Final SEIR 3 includes a supplementary parking analysis for the purpose of comparison to previous analysis and informing jurisdictions of potential impacts. The inclusion of the parking analysis is for information purposes only and, consistent with CEQA Guidelines § 15063.4 and SB 743, is not part of the CEQA impact determination.

Pursuant to the Public Resources Code (PRC) Division 13 - Environmental Quality, Chapter 2.7 - Modernization of Transportation Analysis for Transit-Oriented Infill Projects - PRC § 21099(d), aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other

discretionary powers provided by other laws or policies. Additionally, for the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.

Transit priority area is defined as an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan. Infill site is defined as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

1.4.5 Safety and Security

As presented and approved in the 2013 FEIR and subsequent environmental actions, the safety and security analysis considered passengers, employees, and the community including pedestrian, bicyclist, and motorists where they would cross over tracks, enter stations, or encounter hazards in the vicinity of other transit facilities during construction and operation of the Project. This safety and security analysis considers crime prevention and the potential for crime within the vicinity of the Project Modifications based on these changes.

Evaluation of safety and security impacts of the Project Modifications uses the same criteria as described in the 2013 FEIR and subsequent environmental actions. Impacts on safety and security would be considered significant if the Project Modifications would have the potential to:

- Create the potential for increased pedestrian and/or bicycle safety risks.
- Create substantial hazards including station, boarding, or disembarking accidents; rightof-way accidents; collisions between LRT/automobile and LRT/pedestrian; fires; or major structural failures.
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Substantially limit the delivery of emergency responses such as police, fire, or emergency services to locations along the proposed alignment.
- Create the potential for adverse security conditions including incidents, offenses, crimes, or terrorism.

1.4.6 Land Use

An evaluation of the Project Modifications on existing and planned land uses was conducted to assess the types and severity of the impacts. The changes in land use associated with the Project Modifications were evaluated. Evaluation of the Project Modifications' land use and planning impacts uses the same criteria as described in the 2013 FEIR and subsequent environmental actions. Land use and planning impacts are considered significant if the Project Modifications would:

- Conflict with any applicable land use plan, policy, or regulation by an agency with jurisdiction over the project (including, but not limited to, a General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Physically divide an established community.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

The Project Modifications would have a less than significant impact to land use and planning, if the modifications, in general, do not conflict with any applicable land use plan. No habitat conservation plan or natural community conservation plan applies to the Study Area, and as presented in Section 4.5, Communities, Population, and Housing, there would be no community impacts. The Project Modifications would not physically divide an established community; therefore, these impact criteria are not discussed further.

1.4.7 Air Quality

Evaluation of the air quality impacts in this Final SEIR 3 focuses on the construction and operational changes caused by the Project Modifications in comparison to (a) what was analyzed in the 2013 FEIR and subsequent environmental actions; and (b) existing conditions. Impact evaluation includes (1) short-term construction impacts; (2) long-term regional impacts; (3) localized CO and particulate matter (PM) hot spot assessment; and (4) mobile source air toxics (MSAT) effects.

Evaluation of the Project Modifications' air quality impacts uses the same criteria as described in the 2013 FEIR and subsequent environmental actions. Air quality impacts are considered significant if the Project Modifications would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute to any existing or projected air quality violations.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including release of emissions that exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors (health care facilities, rehabilitation centers, retirement homes, residences, schools, parks and playgrounds, childcare centers) to substantial pollutant concentrations, including air toxics such as diesel particulates.
- Create objectionable odors affecting a substantial number of people.

1.4.8 Noise and Vibration

The noise and vibration impact assessment uses the same methodology as that used in the 2013 FEIR and subsequent environmental actions noise evaluation. The impact criteria are the same as applied in the 2013 FEIR and subsequent environmental actions. An impact related to noise and vibration is considered significant if the Project Modifications would:

- Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels.
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Project.
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the Project.

2 Summary of Transportation Enhancements of the Project with SEIR 3 Project Modifications

2.1 VMT and GHG Reduction

The Project Modifications, including the transit Park & Ride facility, are not expected to change transit infrastructure or travel demand and would have no impact on ridership demand, VMT, and GHG. As a result, based on CEQA Guidelines §15064.3, the Project Modifications would have no impact to transportation and air quality.

The Project Modifications in SEIR 3 do not change the VMT results from the approved project, which showed a VMT reduction due to the Project. Therefore, the Project and Project Modifications are deemed to have beneficial effects regarding transportation.

2.2 Enhanced Transit Infrastructure

The Project Modifications do not change the nature of the Project. The Project brings a high quality, fixed-guideway, LRT line with frequent and direct service to the San Gabriel Valley, downtown Los Angeles and beyond. The LRT transit service is an enhancement to existing transit service in the study area. The enhanced transit service is considered an improvement on the existing conditions that would result in improved travel times, travel times reliability and savings, and efficiency for residents and employees in the study area.

2.3 Enhanced Parking Facility for Transit Services

The Project Modifications will reconstruct and improve the existing parking facility. The Project Modifications would include landscaping features, security cameras, bicycles and pedestrian facilities, and ADA access and egress. The existing parking lot on the proposed site would be redeveloped to accommodate the same number of parking spaces as identified for the approved

parking location in San Dimas. The Project Modifications would reconstruct the existing transit parking facility to provide approximately 114 additional parking spaces over the existing 175 spaces for a total of approximately 289 spaces, which would remain consistent with the approved Project. Therefore, no change in parking demand or ridership levels are anticipated due to the Project Modifications and the community will realize benefits associated with an increase in parking capacity in San Dimas.

As described in Section 1.2.3 (Project Modifications) in the Final SEIR 3, the proposed San Dimas parking facility would include a Kiss & Ride area to allow for pick-up and drop-off. The Kiss & Ride area would be located north of Freedom Park to allow vehicles to enter the parking lot from Commercial Street, pick-up or drop-off passengers in the designated area, and continue travelling east where vehicles would exit south onto San Dimas Avenue. This would allow vehicles to move efficiently through the parking lot and would limit vehicles from circling the parking lot while they wait to pick-up/drop-off passengers. The Kiss & Ride would be located within the footprint of the existing parking lot and would not encroach into Freedom Park. The parking facility improvements are considered an enhancement on the existing conditions.

2.4 Enhanced Pedestrian and Bicycle Infrastructure and Safety/Security

As discussed in Section 1.2.2 of the Final SEIR 3, pedestrian and bicycle elements would be included to accommodate active modes of access between parking lots and stations. Features including pedestrian walkways and channelization/signage would be included to ensure safe routes for passengers between parking areas and stations. Pedestrian access from the relocated parking facility to the station platform would be via a signalized pedestrian crossing on San Dimas Avenue just south of the Project ROW. The new signalized pedestrian crossing at San Dimas Avenue would be designed to Metro's Design Criteria, as well as all local and state safety standards including Americans with Disabilities Act (ADA), resulting in a highly visible and illuminated signalized crossings to ensure safe circulation for all patrons crossing between the parking lot and the station platform. The signalized intersection is an improvement to pedestrian circulation across San Dimas Avenue as compared to the existing conditions and is considered an enhancement to pedestrian infrastructure. Additional pedestrian and bicycle access is provided by an existing traffic signal and crosswalk at the intersection of Commercial Street and San Dimas Avenue.

The Project Modifications include pedestrian and bicycle safety and accessibility design elements (traffic signals), bike shelters/racks, and bike and pedestrian pathways in accordance with Metro Station Design Criteria within the immediate vicinity of the station area. These first/last mile elements would improve pedestrian and bicycle circulation and safety for both riders and automobile users. The pedestrian and bicycle improvements are considered an enhancement on the existing conditions.

2.5 Construction Schedule Reduction

Relocating and reconfiguring the San Dimas parking facility from the Approved Project would result in less construction and time to construct. The location of the San Dimas parking lot included in the Approved Project contains existing uses, such as the City of San Dimas

Maintenance Facility, that would need to be relocated and demolished as part of construction. Relocating the San Dimas parking to the existing park and ride location proposed substantially reduces the amount of demolition, site preparation and active construction necessary. This would reduce the duration of temporary impacts related to construction easements and staging areas would occur, in addition to the number of construction personnel required.

3 Discussion on Potential Secondary Impacts

3.1 Transit

3.1.1 Foothill Transit Bus Service

Foothill Transit bus lines 492 and 499 may be eliminated following implementation of the Project. Determination for the continued operation, revision or discontinuation of service on bus lines 492 and 499 during and after construction of the Gold Line Phase 2B is entirely within the purview of Foothill Transit and not under the control of the Construction Authority or Metro. The Construction Authority coordinated with Foothill Transit staff on the planned timing of construction and options for revision or discontinuation of their existing services. Coordination with Foothill Transit will continue throughout construction of the Gold Line Phase 2B.

Short term impacts to circulation and transit connectivity based on the Project Modifications are addressed by existing mitigation measures CTR-1 through CRT-3.

Foothill Transit can continue to operate their downtown service if desired, but they may need to identify another location for parking. Given that the disposition of future Foothill Transit service has not been fully determined and is not within the purview of the Construction Authority, any evaluation of effects could only be based on speculation of changes that could occur. Therefore, further consideration for changes to the Foothill Transit operations was not evaluated as is not a part of the project or Project Modifications.

Provision for high-quality, reliable light rail transit in the form of the Gold Line Phase 2B will provide environmental benefits and that will also permit future changes in Foothill Transit bus service to improve efficiency of operations and connectivity should they be desired by Foothill Transit.

3.1.2 Bus Stop Relocation

Due to the limitations of the Park & Ride lot size, bus drop-offs cannot be accommodated onsite. The Construction Authority is proposing to fund and construct enhancements to bus stop facilities to accommodate connectivity between the future transit service, including expanding and rebuilding the bus shelters at the two bus stops on Bonita Ave just east of San Dimas Ave.

3.1.3 Parking for Foothill Bus Service

During construction of the Project Modifications, the existing parking configuration will be modified in order to accommodate the increase in spaces planned under the Project Modifications. The construction process is anticipated to last for less than 2 years prior to the opening of the Metro Gold Line service, while the Foothill Transit service is still in operations. The Construction Authority has identified a phasing plan for construction that will maintain a portion of the parking lot for Foothill Transit users throughout the duration of construction. This will provide Foothill Transit service riders continued access to the Park & Ride at the San Dimas location throughout most, if not all of the construction process. While construction will temporarily reduce the number of available Park & Ride spaces for existing Foothill bus service, this does not constitute an impact under CEQA. Consistent with CEQA Guidelines § 15063.4 and SB 743, the temporary parking reduction is not considered a CEQA impact since it is not an area of analysis required for consideration. It is also noted that parking for access to transit service will be increased over existing supply under the Project Modifications. The Construction Authority has committed to development of a Parking Management Plan (PMP) that would restrict transit patron parking on residential streets in the vicinity around the parking facility. This could include parking by permit only or other parking controls that restrict parking by nonresidents. Furthermore, efforts by the Construction Authority to phase construction in order to preserve parking and use of the lot during construction would not limit existing transit service and access. The phasing plan for construction that maintains the maximum number of spaces for the lot throughout the duration of construction, combined with the development and enforcement of PMP will avoid parking spillover into the adjacent neighborhoods during construction.

The City will be compensated for the Parking lot by the Authority. Therefore, the City has the opportunity to use the acquisition funds for establishing a new parking facility for the Foothill Transit bus lines if desired.

3.2 Traffic

3.2.1 Traffic Level of Service

The technical analysis conducted in SEIR 3 is consistent with the methodology and level of analysis conducted and approved in the 2013 FEIR and subsequent environmental actions.

In accordance with SB 743, CEQA no longer considers traffic level of service (LOS) or intersection delay as an environmental impact within a transit priority area. However, a supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications.

As discussed in Section 3.2.6, the traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Avenue/Railway Street, and delay of 4.5 seconds at San Dimas Avenue/Commercial Street, however, both intersections would remain at a traffic level of service A or B (the lowest levels of traffic delay).

3.2.2 Changes to Local Traffic Circulation

The proposed Project Modifications do not include any changes to project features in the vicinity of the Cataract Avenue/Arrow Highway and Cataract Avenue/Bonita Avenue intersections, therefore no changes in access to these streets are anticipated as a result of the Project

Modifications. The conclusion that the travel patterns at these two intersections would remain substantially the same is based on professional judgement and knowledge of the area by a traffic expert. There is no evidence that the travel patterns would change. The new parking lot on San Dimas Avenue is located approximately 1/4 mile west from the previously proposed parking lot on Walnut Avenue. Both locations are east of Cataract Avenue and Bonita Avenue and Arrow Highway are the two major east-west streets on either side of both parking lots. Drivers coming from the west would continue to have similar patterns to and through the Cataract Avenue/Arrow Highway and Cataract Avenue/Bonita Avenue intersections.

Additionally, Wardrop's principle of traffic equilibrium¹ dictates that drivers will choose the most effective and minimal time travel path. Meaning, drivers will naturally choose use higherclassification streets (such as San Dimas Avenue) over minor access road (such as Monte Vista), when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicate that the LOS on San Dimas Avenue will be acceptable, which implies that drivers will reasonably be expected to use San Dimas Avenue (and major crossing streets like Bonita Avenue and Arrow Highway) without cutting through neighborhood streets. Therefore, additional traffic analysis on side streets is not deemed necessary.

3.2.3 Traffic Calming

The Metro's First/Last Mile Plan for the Project was a coordinated effort between Metro, the Construction Authority, and the City of San Dimas. The plan introduces additional safety features through design and vehicular speed control measures around station locations to prevent and minimize potential conflicts between motorists, pedestrians, and bicycles. The Construction Authority would consider opportunities to implement First/Last Mile Plan projects that are within the Construction Authority's work areas into construction of the Project Modifications if additional funding is made available.

The Construction Authority will work with the City of San Dimas to identify and fund traffic and speed control devices, including traffic calming devices such as additional signage, active speed identification signs, speed humps/bumps, and other devices along Commercial Street, Railway Street, and Monte Vista Avenue, as warranted and supported by the City of San Dimas, to reduce potential automobile and pedestrian/bicycle conflicts.

3.2.4 Traffic Queuing at New Crosswalk

As discussed in Section 3.2.6.2 and shown in Table 3-7 of the Final SEIR 3, the San Dimas Avenue/Commercial Street intersection is anticipated to operate at LOS A. Typically, vehicle queue is minimal at this LOS level. However, based on the analysis model (Synchro/Sim Traffic software), the 95th percentile queue for all approach lanes to the intersection are expected to be accommodated within the existing available storage.

¹ https://www.researchgate.net/publication/227555985_Wardrop_Equilibria

As summarized in the technical memo, the delays for both approaches to the crosswalk along San Dimas Avenue during the peak hours are minimal and the projected queue lengths are within the available storage upstream of the signals. Therefore, the neighborhoods along San Dimas Avenue north of Bonita Avenue are not expected to be substantially affected by the proposed traffic queueing associated with the Project Modifications.

3.2.5 Temporary Traffic Impacts

Short-term construction impacts primarily include temporary lane closures and detours as a result of construction activities. These temporary impacts would be limited by scheduling certain construction activities during hours outside of the AM and PM peak commuting periods, and through the use of clearly signed detour routes where necessary. The Project Modifications would include short-term construction impacts for the specific locations where temporary closures or detours would be necessary as a result of the change in parking facility footprint and location. However, any potential increase in VMT resulting from out-of-direction travel or construction truck delivery/hauling trips would be temporary in nature and, therefore, would not permanently conflict with CEQA Guidelines § 15064.3, subdivision (b) related to transportation impacts.

As discussed in Section 4.13.3.3, during construction, motorists, pedestrians, and bicyclists would experience temporary safety hazards as part of construction of the Project Modifications. This would result from the number and proximity of vehicles and people adjacent to the Project Modifications locations. The potential for safety and security impacts would be minimized by compliance with OSHA, California OSHA, and Metro/Construction Authority safety and security programs, which are designed to reduce potential impacts during construction to less than significant levels, as previously discussed in the 2013 FEIR and subsequent environmental actions. Safety for pedestrians, bicyclists, and motorists would be maintained during construction through the use of signage, partial lane closures, construction barriers, and as approved in the 2013 FEIR for the Project, standard site and security practices by safety and security personnel at access points and throughout construction sites, in accordance with the 2013 FEIR and subsequent environmental actions. Implementation of construction and safety-related mitigation measures identified in the 2013 FEIR and subsequent environmental actions would further reduce potential short-term construction-related impacts associated with the Project Modifications to less than significant.

Relocating and reconfiguring the San Dimas parking facility from the Approved Project would result in less intensive construction activity and less construction time because the less developed nature of the proposed parking lot. This would reduce the amount of time the temporary impacts related to construction easements and staging areas would occur, in addition to the number of construction personnel required.

3.2.6 Parking Lot Access Refinement

Based on stakeholder feedback received, the parking lot conceptual design is revised as illustrated in the Final SEIR 3. The design of the intersection at the new driveway and the alley behind residential properties is revised to include a median that will prevent lot patrons from

accessing the alleyway while still allowing access for residents and service vehicles. The median will force drivers travelling eastbound on the alley to turn right on the driveway to exit to Commercial Street and onto San Dimas Ave and would prevent lot patrons from exiting directly onto San Dimas Ave.

Additionally, the design of the intersection at the new driveway and Commercial Street will be modified to dissuade vehicles from traveling west onto Commercial Street and driving through the local streets. Vehicles exiting the parking lot via Railway Street will either continue west to Cataract Avenue or travel south on Monte Vista Avenue. If desired by the City, vehicles will be restricted from turning right onto Commercial Street from Monte Vista Avenue, forcing a left turn to access San Dimas. Further refinements can be made during final design.

3.3 Parking

The Project Modifications will reconstruct and improve the existing parking facility. The Project Modifications would include landscaping features, security cameras, bicycles and pedestrian facilities, and ADA egress. The parking facility improvements are considered an enhancement on the existing conditions since additional capacity will be provided to support a higher level of future transit use for commuting. The parking lot may also be available for use by others during non-commuting times by arrangement with Metro.

As discussed in Section 1.2.3 of SEIR 3, the existing parking lot on the proposed site would be redeveloped to accommodate the same number of parking spaces as identified for the approved parking location in San Dimas. The total number of parking spaces would be approximately 289, which would remain consistent with the Approved Project.

3.3.1 Elimination of Parking for Local Businesses

In accordance with SB 743, CEQA does not consider parking as an environmental impact in transit priority areas. Furthermore, purchase of the current Foothill Transit Park & Ride was completed via agreement with Metro in line with Prop A and Prop C local return guidelines, in which the parking facility is intended primarily for use as a transit commuter Park & Ride. The guidelines stipulate that the lot could be open for general parking during non-transit use time, e.g., evenings and weekends, provided that transit user demands are not adversely impacted. All revenues, (for example, parking, advertising or related revenue) generated during the non-transit use time must be returned to the Jurisdictions' local return account in the same proportion as the original local return investment in the facility. Thus, no right exists for use of the parking lot for anything that infringes on transit user demands, particularly during normal commute times.

Additionally, the City will be compensated for the parking lot by the Construction Authority. Therefore, the City has the opportunity to use the acquisition funds for establishing a new parking facility for use by business patrons in downtown San Dimas.

The analysis of potential economic impacts is not required per CEQA Guidelines. Sites proposed to be developed for parking facilities have been evaluated in accordance with all

CEQA standard requirements and protocols and significant impacts are not anticipated as discussed throughout the Final SEIR 3.

3.3.2 Parking Management Plan and Spillover Parking

As discussed in Section 1.2.3, all jurisdictions would be provided a Parking Management Plan (PMP) developed by the Construction Authority that would prohibit on-street parking for transit patrons. These restrictions would be enforced by local jurisdictional law enforcement and Metro to prohibit overflow parking in nearby neighborhoods. It is the responsibility of the cities to adopt and implement the PMP and accept Metro's offer for additional enforcement presence if it is preferred.

3.4 Safety and Security

3.4.1 Safety

The safety analysis determined that implementation of the mitigation measures (SS-3 through SS-10) identified in the 2013 FEIR and subsequent environmental actions would reduce long-term impacts associated with the Project Modifications to less than significant. As described in the 2013 FEIR and subsequent environmental actions, station safety measures include adequate pedestrian queuing and refuge areas, as well as wide crosswalks to facilitate pedestrian mobility. Additionally, the Construction Authority has committed to work with the City of San Dimas to identify and fund traffic control measures on Commercial Street, West Railway Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

The proposed crosswalk connects the proposed Gold Line parking lot (west of San Dimas Avenue and south of the tracks) to the proposed Gold Line Station (east of San Dimas Avenue and south of the tracks). The approximately 55 feet from curb ramp to curb ramp and 12 feet wide crosswalk will cross San Dimas Avenue south of the tracks. The crosswalk will be signalized for safety of the pedestrians.

As discussed in Section 4.13.3.3, during construction, motorists, pedestrians, and bicyclists would experience temporary safety hazards as part of construction of the Project Modifications. This would result from the number and proximity of vehicles and people adjacent to the Project Modifications locations. The potential for safety and security impacts would be minimized by compliance with OSHA, California OSHA, and Metro Construction Authority safety and security programs, which are designed to reduce potential impacts during construction to less than significant levels, as previously discussed in the 2013 FEIR and subsequent environmental actions. Safety for pedestrians, bicyclists, and motorists would be maintained during construction through the use of signage, partial lane closures, construction barriers, and supervision by safety and security personnel at access points and throughout construction sites, in accordance with the 2013 FEIR and subsequent environmental actions would further reduce potential short-term construction-related impacts associated with the Project Modifications to less than significant.

3.4.2 Security

The proposed site for the relocated parking lot is already used for Foothill Transit rider parking, therefore, it is not anticipated that the Project Modifications would exacerbate the safety and security of this location from existing conditions.

CEQA safety analysis determined that implementation of the mitigation measures (SS-3 through SS-10) identified in the 2013 FEIR and subsequent environmental actions would reduce longterm impacts associated with the Project Modifications to less than significant. Consistent with the 2013 FEIR and subsequent environmental actions, Crime Prevention Through Environmental Design (CPTED) features would be incorporated in the Project Modifications to provide a safe, secure, and comfortable transit system. Crime Prevention Through Environmental Design (CPTED) is a multi-disciplinary approach of crime prevention that uses urban and architectural design and the management of built and natural environments. CPTED strategies aim to reduce victimization, deter offender decisions that precede criminal acts, and build a sense of community among inhabitants so they can gain territorial control of areas, reduce crime, and minimize fear of crime. CPTED is pronounced 'sep-ted' and it is also known around the world as Designing Out Crime, defensible space, and other similar terms. CPTED principles for transit stations include open visible platforms, adequate lighting, signage. emergency telephones, public address system, and security camera monitoring systems. Fencing and landscape would be provided along the perimeter of the Project Study Area along Monte Vista Avenue and on the southern edge of the Project Modifications near the alley. These principles would be incorporated as part of the Metro Design Criteria. Additionally, law enforcement personnel would also routinely patrol the stations and parking areas to help prevent crime from occurring.

Similar CPTED design principles would be used to deter vagrancy at parking facilities, such as adequate lighting, signage, emergency telephones, security camera monitoring systems, providing law enforcement personnel, and a bench that would be integrated into the transit shelter and contain design measures to prevent people from lying down comfortably. Security camera monitoring would also be placed near Freedom Park for additional security. In addition, Metro's Transit Homeless Action Plan, as discussed in SEIR 1 and SEIR 2, implements a comprehensive outreach and engagement plan providing homeless individuals with resources and services, while maintaining a clean environment and a high level of public safety for Metro transit patrons using the parking facilities.

3.5 Land Use

As discussed in Section 1.2.3, the proposed new location is currently used as an existing San Dimas Park & Ride lot for Foothill Transit. In addition, as discussed in Section 4.11.3.3, the Project Modifications would not result in short-term construction impacts that would conflict with any applicable land use plan, policy, or regulation by an agency with jurisdiction over the project (including, but not limited to, a General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, the Project Modifications would not physically divide an established community; therefore, impacts would be less than significant.

As discussed in Section 4.5.3.3, the proposed relocated and reconfigured San Dimas parking facility would not require the acquisition or displacement of residential housing or commercial businesses. Therefore, no construction impacts would occur related to the acquisition or displacement of housing or businesses, and mitigation measures are not required. Additionally, the analysis of potential economic impacts is not required per CEQA Guidelines.

As discussed in Section 4.11.3.4, the proposed location for the San Dimas parking facility is currently used as a Foothill Transit Park & Ride facility, therefore no change in land use is planned. Additionally, the area planned for the new roadway access is currently a vegetated area that contains no park facilities or amenities. Landscaping and a sitting wall or fence would be provided to Freedom Park as part of the Project Modifications, which would be consistent with exiting land uses. The site it currently a surface parking lot for the Foothill Transit San Dimas Park & Ride. Furthermore, building a parking facility adjacent to the existing Project ROW is consistent with the San Dimas General Plan for this area, which is zoned as "Creative Growth" to promote amenities beyond those expected under conventional planning and development, such as mass transit facilities including bus and train stations.

The Project Modifications would involve a full acquisition of the Foothill Transit Park & Ride lot. However, this land could be developed to include a shared subterranean parking facility incorporated into a TOD. Metro's Joint Development division can engage with potential developers and create agreements similar to other successful TODs implemented throughout the Metro rail network. While the proposed parking facility would not foreclose a future shared parking / development project, there is not a current shared use proposal, and thus there is not sufficient information to conduct a meaningful CEQA analysis of such a project at this time.

3.6 Air Quality

3.6.1 Construction Schedule Reduction

The modified parking configuration would be located on 2.57 acres of land, 0.79 acres less than the approved configuration included in SEIR 2, resulting in less construction (duration and equipment) than originally assumed in the 2013 FEIR. The relocation of the parking facility would also result in fewer relocations of facilities than would have be required under the location approved in the SEIR 2, such as the City maintenance yard and commercial properties. Since overall construction duration, equipment, and activities are anticipated to be less, overall construction emissions are also anticipated to be lower than previously disclosed in the 2013 FEIR and subsequent environmental actions. Since construction activities associated with the Project Modifications would occur on an approximate 2.57-acre site, the daily emissions associated with the construction activities for the relocation of the parking facility would be less concentrated than the assumptions and thresholds (1-acre project site) used in the representative project analysis in the 2013 FEIR. In addition, actual emissions from construction equipment may be lower than what was quantified in the 2013 FEIR and subsequent environmental actions due to advancements in engine technology, retrofits, and equipment fleet turnover as stricter regulatory standards take effect. Thus, as construction occurs in later years, exhaust-related emissions are anticipated to result in lower levels of emissions. With the incorporation of mitigation measures CON-1 through CON-19, short-term impacts of the Project

Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions, including SEIR 1 and SEIR 2. No new or more severe significant impacts would occur.

3.6.2 VMT and GHG Reduction

As described in Section 4.4, the Project Modifications would continue to result in an overall greenhouse gas emissions (GHG) reduction associated with the vehicle miles traveled (VMT) savings. As such, the Project Modifications would not cause significant long-term impacts related to GHG emissions and no additional mitigation is required. Furthermore, as explained in Chapter 3 (Transportation), the Project Modifications would not change the ridership levels projected at the San Dimas Station, as the same number of parking spaces would be provided at the new location. Therefore, the Project Modifications would result in no change to ridership levels of any station and would not change the anticipated VMT savings realized through implementation of the Project as described in SEIR 2. In addition, the change in the travel pattern due to the relocation of the San Dimas Station would not affect the regional travel pattern, or result in additional vehicle miles traveled and thereby, emissions, due to the close proximity between the currently approved parking location in San Dimas and the proposed location under this Project with the Project Modifications.

3.6.3 Queuing and Idling

Construction of the Project would be short-term and completed in segments according to the phased construction schedule; therefore, trucks and off-road equipment would not operate in the immediate vicinity of the sensitive receptors for an extended period of time. In addition, implementation of measures that ensure equipment and vehicles engines are in good operating conditions in proper tune per manufacturer specifications (CON-9), idling limits for heavy-duty trucks (CON-10), use of low-emitting portable generators (CON-14), and appropriate engine sizes relative to the intended job (CON-17) would minimize substantial TAC emissions for the surrounding sensitive receptors. Consistent with the 2013 FEIR and subsequent environmental actions, impacts associated with the Project Modifications would be less than significant.

3.6.4 Kiss & Ride Traffic Flow

As described in Section 2 above, the Project Modifications would include a Kiss & Ride area to allow for pick-up and drop-off that would be located north of Freedom Park. The purpose of the Kiss & Ride is to allow vehicles to enter the parking lot from Commercial Street, pick-up or drop-off passengers in the designated area, and continue travelling east where vehicles would exit south onto San Dimas Avenue. Vehicles would not be allowed to park there or stay for extended periods of time, which would allow vehicles to move efficiently through the parking lot and limit vehicles from circling the parking lot while they wait to pick-up/drop-off passengers.

3.7 Noise

Noise analyses were based on the Federal Transit Administration (FTA) Noise and Vibration Impact Assessment guidance manual established for transit facilities including transit parking facilities. In accordance with this methodology, distance is typically measured from the center of a parking facility to the nearest receptor locations when determining operational noise effects. However, the operational noise analysis completed utilized a more conservative estimate of distance to sensitive receptors of 60 feet, based on the distance from the nearest edge of the parking lot. The distance from construction activities was based on the parking facility area and anticipated construction activities. As a result of the proximity of the new access driveway to residential development, the noise levels from the driveway access point on Commercial Street were predicted separately from the noise from the parking lot. The nearest noise sensitive receiver to the middle of the access drive is the residence located 43 feet west on Commercial Street.

Specific information on the operational and construction noise assessment is provided in the revised Final SEIR 3 Appendix C. The analysis confirmed there would not be significant construction or operational noise and vibration impacts as a result of the parking facility and access driveway location. During construction of the parking lot, activities on average will take place in the center of the lot which is approximately 130 feet to the nearest sensitive receiver south of the parking lot. During construction of the access drive on Commercial Street, the activities on average will take place at the center of the drive which is 43 feet east from the nearest sensitive receiver. The predicted noise levels for paving and grading of the access drive and main parking lot (79 dBA) are below the FTA noise impact threshold (80 dBA). These levels also take into account the existing concrete wall that is present along the western edge of the proposed access driveway. Additionally, landscaping would also be added to Freedom Park adjacent to the new access driveway in accordance with preliminary designs developed by the City of San Dimas, which would enhance the future condition. Furthermore, the project already includes a noise mitigation measure (N-1) that address contractor requirements and best management practices to implement noise control measures when working near residences and these will be implemented as part of the construction of the San Dimas parking lot.



Metro Gold Line Foothill Extension Construction Authority